

Department of Energy
Under Secretary for Nuclear Security
Administrator, National Nuclear Security Administration
Washington, DC 20585



January 3, 2020

The Honorable Bruce Hamilton
Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Avenue NW, Suite 700
Washington, DC 20004

Dear Mr. Chairman:

I continue to appreciate the Defense Nuclear Facilities Safety Board's (DNFSB or Board) support to the Department of Energy's National Nuclear Security Administration (DOE/NNSA) in the safe operation of our facilities. I remain committed to ensuring DOE/NNSA continues to conduct our national security mission in a manner that provides adequate protection to the public, our workforce, and the environment.

I am responding on behalf of the Secretary to your letter dated December 5, 2019, in which the Board reaffirmed its Recommendation 2019-2, *Safety of the Savannah River Site Tritium Facilities*. As I noted in my September 10, 2019, letter in response to Recommendation 2019-2, I want to assure you that DOE/NNSA remains fully compliant and committed in our duties to the American public in the safe operation of these facilities as outlined in my enclosure to that letter. In light of the Board's reaffirmation of the Recommendation, the reasoning and analysis underlying DOE/NNSA's position is provided below.

As indicated in my September 10, 2019, letter and reiterated at the Board's October 28, 2019, public meeting, the basis for DOE/NNSA not accepting Recommendation 2019-2 is rooted in our conclusion that the Savannah River Tritium Enterprise (SRTE) provides adequate protection of the public and worker safety. DOE/NNSA action on this Recommendation was not influenced by any considerations related to the purview of the Board's nuclear safety oversight responsibilities. While the Board Recommendation cites high postulated worker consequences in the SRTE safety analysis, these calculations do not represent expected dose consequences to onsite personnel. Instead, these highly conservative theoretical analyses are designed to inform the safety controls selection process and identify quality requirements for selected controls.

The Board's December 5, 2019, letter provides no new substantive information and reaffirms its original recommendation without changing it. Therefore, DOE/NNSA's previous bases for not accepting the Recommendation still apply as summarized below.

SRTE is relatively remote and our conservative analysis of bounding accident scenarios demonstrate that the dose to the public is below the evaluation guideline used to evaluate the need for the highest quality safety controls. DOE/NNSA has established a robust set




of safety management programs and emergency response procedures to augment the specific administrative controls and engineered safety systems identified in the SRTE documented safety analysis. The workforce at SRTE is well trained and has a recognized history of strong performance implementing DOE's defense-in-depth strategy and executing work safely. After considering all these factors, DOE/NNSA is confident that the risk to our workforce is comparable to or less than other normally-accepted industrial risks.

Altogether, DOE/NNSA concludes that we are providing adequate protection to the public and the workers at SRTE. Additionally, focused ongoing actions at the Tritium Facilities at SRS adequately address DNFSB concerns discussed in the Recommendation and make the need for additional response actions unnecessarily duplicative of our effort. Therefore, while I welcome continued productive interactions with the Board on the safety posture of SRTE, I do not accept Board Recommendation 2019-2. This letter constitutes the Secretary's final decision pursuant to 42 U.S.C. § 2286d(e).

If you have any questions, please contact Ms. Nicole Nelson-Jean, Manager, Savannah River Field Office, at (803) 208-3689.

Sincerely,

A handwritten signature in black ink that reads "Lisa E. Gordon-Hagerty". The signature is written in a cursive style with a horizontal line extending to the right from the end of the name.

Lisa E. Gordon-Hagerty