



ALLIANCE FOR NUCLEAR ACCOUNTABILITY
322 4th Street, NE • Washington, DC 20002



Dr. Peter Winokur, Chair
Defense Nuclear Facilities Safety Board
625 Indiana Ave NW, Suite 700
Washington, DC 20004

10 December 2013

Dear Dr. Winokur and Members of the Board,

We are writing to convey our deep concern about the design of the Uranium Processing Facility at the Y12 complex in Oak Ridge, Tennessee. We appreciate the diligent work the Safety Board has done addressing safety issues as they have been identified in the UPF design process.

We understand the DNFSB has a narrow mandate and appreciate the need to maintain a focus on safety issues. At times, however, because of the unique nature of nuclear weapons facilities, there is a place where safety and security overlap. The decision to site the UPF as an above-grade facility presents one of those times. Exposing the UPF to avoidable security risks has a direct impact on the safety rating of the facility. As documented by the Project on Government Oversight and others during the construction of the UPF's sister facility, the Highly Enriched Uranium Materials Facility, an above ground facility presents six vulnerable surfaces to potential attackers. A below grade facility can be designed and constructed to present one, limited, vertical surface vulnerability at a tightly controlled entry port.

The events of July 28, 2012, when an 82-year-old nun and two middle-aged men penetrated the inner security zone at Y12 and painted peace slogans on the walls of the HEUMF with remarkable ease demonstrated the vulnerability of these facilities. Measures taken since then may have increased the capacity of Y12 personnel to rebuff a ground approach, but the location of an above ground facility in a narrow, shallow valley, surrounded by uncontrolled, heavily wooded ridges, carries profound risks which can not be remediated by better personnel training, functioning detection equipment, or additional physical barriers.

At the moment of an attack on a vulnerable facility, security concerns become unprecedented safety concerns. We believe, as a preventive measure, the Safety Board should insist on a below-grade design for the UPF. Failure to do so will compromise

all other safety efforts of the Board and place the community at risk—a risk which can be largely avoided if the UPF is designed as an underground or below-grade facility.

It is impossible to predict the likelihood of an attack on the UPF, but it is not difficult to conceive of an attack; the UPF would represent a singular target for terrorists. It is possible, however, to gauge the risk of an attack. With the current above-grade design, the risk is 100% for a facility exposed in a narrow, shallow valley. While a below-grade UPF would not eliminate all risk, it would dramatically reduce the risk to a level far below 100%; the security risk reduction would be reflected in a similar increase in the safety level of the facility.

We are grateful for your consideration of our concerns, and will be happy to discuss them further with you. We would like to suggest two key contacts: Ashish Sinha, DC Program Director for the Alliance (202 681 8401/asinha@ananuclear.org) and Ralph Hutchison, coordinator of the Oak Ridge Environmental Peace Alliance, one of our member groups (865 776 5050; orep@earthlink.net).

Sincerely,

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