

July \_\_, 2017

James Biggins, General Counsel  
Executive Secretary for the Hearing  
Defense Nuclear Facilities Safety Board

By email to: [hearing@dnfsb.gov](mailto:hearing@dnfsb.gov)

Re: Public Comments about the Safety Posture of the Plutonium Facility at  
Los Alamos National Laboratory

Dear Mr. Biggins:

Recent incidents, accidents and events at Los Alamos National Laboratory (LANL) continue to threaten the safety posture of the Plutonium Facility.<sup>1</sup> Operations must be halted until ALL outstanding corrective actions are completed to the satisfaction of the Defense Nuclear Facilities Safety Board. These issues have been raised by the Board for years and include, among other things, the need to:

1. Install a working and certified safety-related active confinement ventilation system;
2. Install a working and certified fire suppression systems;
3. Complete the project to store plutonium in certified containers;
4. Install those certified containers in vaults;
5. Increase training and protection for workers;
6. Fill vacant positions within the Department of Energy (DOE) for contractor oversight;
7. Fill vacant positions of criticality specialists at LANL and at all DOE sites handling plutonium and other special nuclear materials.

In your review of the safety posture, please consider emissions, discharges and waste generated by Plutonium Facility operations. A concern is the lack of cleanup and enforcement of laws and regulations governing cleanup which result in growing threats to occupational and public health and safety and the environment.

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<sup>1</sup> The lack of a basic understanding of science is a root cause of the problems. For example, placing plutonium rods in close proximity to each other in 2011; shipments of explosive radioactive and hazardous waste to the Waste Isolation Pilot Plant in late 2013; and more recently, the April 19, 2017 fire in the Plutonium Facility involving an unlabeled container that ignited, where one worker received second-degree burns; the May 2017 shipment of liquid hazardous waste to Colorado for treatment where LANL did not accurately document the pH levels (it was more acidic than reported); the illegal June shipments of plutonium by commercial air carriers in improper containers that were not designed for air travel (the shipments are required to be shipped by ground transport). These are not “normal” events and they threaten occupational and public health and safety and the environment.

I also respectfully request that the recent The Center for Public Integrity's "Nuclear Negligence" five-part series become part of the record.<sup>2</sup> <https://apps.publicintegrity.org/nuclear-negligence/>  
It documents a

[L]itany of mishaps. Workers involved in complex experiments have inhaled radioactive particles that pose lifetime cancer threats. Those involved in everyday tasks get electrical shocks, fall off ladders, and are hurt moving heavy objects. They get knocked over when tests go awry. And they are burned by acid or in fires, splashed with toxic chemicals, and cut by debris from exploding metal drums.

The costs to the government of these mishaps can be high – laboratory work is sometimes halted while workers are retrained and sites get cleaned or repaired, occasionally for years. But what's particularly striking about the accident records is how these contractors enjoy relative impunity for these problems.

I thank the Board for its leadership and persistence in addressing these important safety issues. Please protect public and occupational health and safety and the environment from the litany of mishaps at the Plutonium Facility at Los Alamos National Laboratory.

Sincerely,

### Your Contact Information

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<sup>2</sup> Part One: A near-disaster at a federal nuclear weapons laboratory takes a hidden toll on America's arsenal – Repeated safety lapses hobble Los Alamos National Laboratory's work on the cores of U.S. nuclear warheads. <https://apps.publicintegrity.org/nuclear-negligence/near-disaster/>

Part Two: Safety problems at a Los Alamos laboratory delay U.S. nuclear warhead testing and production – A facility that handles the cores of U.S. nuclear weapons has been mostly closed since 2013 over its inability to control worker safety risks. <https://apps.publicintegrity.org/nuclear-negligence/delayed-warheads/>

Part Three: Light penalties and lax oversight encourage weak safety culture at nuclear weapons labs – Explosions, fires, and radioactive exposures are among the workplace hazards that fail to make a serious dent in private contractor profits. <https://apps.publicintegrity.org/nuclear-negligence/light-penalties/>

Part Four: More than 30 nuclear experts inhale uranium after radiation alarms at a weapons site are switched off – Most were not told about it until months later, and other mishaps at the Nevada nuclear test site followed. <https://apps.publicintegrity.org/nuclear-negligence/inhaled-uranium/>

Part Five: Repeated radiation warnings go unheeded at sensitive Idaho nuclear plant – The inhalation of plutonium by 16 workers is preceded and followed by other contamination incidents but the private contractor in charge suffers only a light penalty. <https://apps.publicintegrity.org/nuclear-negligence/repeated-warnings/>