

Oak Ridge Environmental Peace Alliance
Oak Ridge, TN
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site, or natural phenomena.

Accidents at old facilities are likely to arise from failure of equipment during operations, human error, failure of Y-12 management to incorporate rigorous safety management on-site, or natural phenomena.

The Y-12 SW-EIS is unable to analyze accidents for its proposed new or expanded facilities in the normal way. The Y-12 SW-EIS states that such analysis would "normally be based on analysis reports performed on completed facility designs. However, facility designs have not been completed for the HEU Storage Mission and Special Materials Mission Alternatives analyzed in this SWEIS." (1, 5-87). This acknowledgment indicates that accident scenario analysis incorporates a larger than "normal" amount of uncertainty.

Accidents at old facilities (which remain in use under the No Action-Status Quo portion of each alternative), are not discussed in detail in the Y-12 SW-EIS. These accidents, however, are the most likely to occur and the consequences of such accidents are likely to be the greatest.

OREPA's assertion that such accidents are most likely to occur is based on the persistent criticisms of the Defense Nuclear Facilities Safety Board which, since 1998, has repeatedly noted three key safety concerns to which DOE and Y-12 management have not adequately responded, and on the fact that Safety Analysis Reports (on which accident scenarios are normally based) do not exist for most of the Y-12 production operations.

The DNFSB criticisms include:

- failure of DOE/Y-12 management to address a huge backlog of maintenance issues, many of which carry potential environment, safety and health risks;
- failure of DOE/Y-12 management to commit to and implement an Integrated Safety Management plan;
- failure of DOE/Y-12 management to adequately recognize and address serious fire safety concerns.

Safety Analysis Reports ("SAR") for the currently operating Y-12 Production facilities were acknowledged by DOE to be out of date and in need of updating in 1992; in 1994, a schedule for the updating of SARs was released; all SARs were to be completed by 1998 and made available to the public. Due to schedule slippage, however, all SARs have not been completed. It is not clear that any have. No SARs are referenced in the bibliographies included in the Y-12 SW-EIS.

Finally, in *Y/EN-5858, Y-12 Site Integrated Modernization 21st Century*, DOE/ Lockheed Martin assert that "The equipment and facilities are being operated in a run-to-failure mode" with regard to current Y-12 operations. Assuming the veracity of this statement, accidents are not only "more likely," they are inevitable. (*Y/EN-5858, Y-12 Site Integrated Modernization 21st Century*, p.11)

It is no surprise then, that the Y-12 SW-EIS downplays the seriousness of any impacts arising from its accident scenarios. It is also no surprise that OREPA finds DOE's assurances hollow and incredible. The Y-12 SW-EIS should be withdrawn in order to allow extensive revision to include all accident scenarios to be fully explored.

HEU FACILITY

Especially troubling in the Y-12 SW-EIS's description of the Highly Enriched Uranium facility is the failure of DOE to design complete transparency into the entire facility.

US and international nonproliferation efforts look toward the day when special nuclear materials (plutonium and highly enriched uranium) will be placed under international control, and all nuclear weapons facilities will be subject to international inspection for verification of treaty obligations.

The highly enriched uranium facility proposed in the Y-12 SW-EIS is the type of facility that will be at the top of the list—in both importance and ease (with regard to security issues)—for openness.

Comment No. 20 (cont.)

Issue Code: 13

Y-12 Emergency Response Boundary, but would not reach the closest residential area.

The violation of permits leading to off-site releases of contaminants in water during 1999, referred to by the commentor, were NPDES chlorine permit limit excursions. Chlorine is used to pretreat effluent before it is released. Actions were taken at the time of the excursions to correct the problem, and no fines or penalties were assessed by TDEC in connection with these violations.

Comment No. 21

Issue Code: 12

Comment noted. The effects due to past releases are reflected in the No Action - Status Quo Alternative. Volume I, Chapter 4 of the Y-12 SWEIS describes the current affected environment (baseline) which includes the effects of past operations and environmental contamination.

28/15
(cont.)

Comment No. 22

Issue Code: 25

The No Action - Planning Basis Operations Alternative for the Y-12 SWEIS comes from the Record of Decision (ROD) for the Final Programmatic Environmental Impact Statement for Stockpile Stewardship and Management (SSM PEIS) (61 FR 68014, December 26, 1996). In this ROD, the Secretary determined that DOE would continue the assigned weapons mission at Y-12. As a result, the No Action - Status Quo Alternative is not considered a reasonable alternative for the future of Y-12 because it would not meet Y-12 mission needs and would not reflect DOE's decision in the SSM PEIS ROD to maintain and downsize nuclear missions at Y-12 (see Sections 1.2 and 3.2.1 of the SWEIS). However, both No Action Alternatives are analyzed in the SWEIS and impacts are identified.

29/16

Comment No. 23

Issue Code: 12

Potential D&D activities do not necessarily corresponds to vacated facilities resulting from the proposed action and alternatives in the SWEIS. Only those facilities declared surplus to DP mission needs will be considered and evaluated for potential transfer to EM and D&D.