rity Administration’s first Deputy Administrator for Defense Programs from July of 2000 until the end of the Clinton Administration in January of 2001. During a separate stint at the Department of Energy before the creation of the NNSA, she was the Associate Deputy Secretary of Energy for National Security Programs. She has spent three stints on the Armed Services Committee’s staff: from 1990 to 1995, from 1997 to 2000, and from 2001 until now. “She is well qualified, and she would make a terrific assistant secretary,” Levin said in a statement provided to NW&M Monitor. “We look forward to her appearance before the committee.”

—Todd Jacobson

DOE RESPONDS TO DNFSB CONCERNS ABOUT NUCLEAR SAFETY GUIDELINES

Responding to concerns raised by the Defense Nuclear Facilities Safety Board about Department of Energy nuclear safety guidelines, Energy Secretary Steven Chu told the Board that the Department was making significant improvements in nuclear safety but declined to adopt all of the Board’s recent nuclear safety recommendations. In a Feb. 28 letter to DNFSB Chairman Peter Winokur, Chu said the Department “partially accepts” DNFSB Recommendation 2010-1, “Safety Analysis Requirements for Defining Adequate Protection for the Public and the Workers,” and cited a handful of improvements that had already been made to the safety bases that govern nuclear safety at facilities around the DOE complex and to safety standards and procedures. Chu, however, said the Department had not altered its interpretation of requirements for developing and approving Documented Safety Analyses, one of the key concerns raised by the Board.

The Board had taken issue with the Department’s interpretation of DOE’s nuclear safety regulation and Standard 3009-94, which outlines “safe harbors” that provide guidance for the preparation of Documented Safety Analyses (DSA) at nuclear facilities across the NNSA and DOE Complex. The standard mandates that safety class systems, structures and components be installed if estimates for unmitigated exposures at the boundary of a facility exceeds 25 rem. “The Board is just very uncomfortable that its historical understanding and interpretation of the rule and safe harbor methodology, which we believe ensures adequate protection of the public and workers, is being interpreted differently by the Department,” Winokur told NW&M Monitor in the fall. “I think it’s fair to say we’re not convinced their interpretation of the rule will lead to adequate protection of public health and safety. We want to be clear on that.”

DOE Reviewing Standards

In his letter, Chu said the Department was currently working on an implementation plan for the DNFSB’s recommendation, and he said DOE was currently reviewing Standard 3009, but he wouldn’t commit to reinforcing the standard by making it a hard and fast rule. “The purpose of a ‘safe harbor’ is to provide a standard methodology that, if followed, will provide credible analyses and adequate safety,” Chu wrote. “Nothing in the concept implies that ‘safe harbor’ methodologies are the only way to meet requirements. Of course, alternative approaches must be approved by DOE, and the criteria for accepting these alternatives should be clearly defined.”

He said the standard would be updated and mandatory provisions would be identified, but alternative safety approaches would still be allowed. “This will assure implementation of DOE Standard 3009, where appropriate, while maintaining the flexibility to improve the standard, as needed,” Chu wrote. “This approach has allowed DOE to make several important improvements in the past.”

Chu: PF-4 Improvements Underway

The Board’s recommendation was sparked by the NNSA’s approval of safety documents related to the operation of Los Alamos National Laboratory’s Plutonium Facility, known as PF-4, in 2008. The facility’s DSA indicated that in the case of an accident, the mitigated dose for a person off lab property would be 2,500 rem, far exceeding DOE’s 25 rem guideline. Four other LANL facilities allow for calculated off-site doses greater than 25 rem without implementing controls or compensatory measures, which the Board interpreted as the Department determining that portions of the nuclear safety standard were optional.

Chu said DOE had determined that the safety measures at those facilities have been deemed to be adequate, and he said several near-term planned improvements will reduce the bounding mitigated dose to below 25 rem at PF-4. That includes the recently completed installation of seismic shutoff systems on the non-safety-related electrical systems at the facility (see related story).

—Todd Jacobson