PROGRAM SAFETY POLICY

- POLICY DOCUMENT PUBLISHED IN MAY 1992

- OVERALL OBJECTIVES:
  -- TO ENSURE THE MAXIMUM PROTECTION OF THE HEALTH AND SAFETY OF THE PUBLIC AND SNTP WORKERS
  -- TO PROTECT PROPERTY FROM DAMAGE OR LOSS
  -- TO PROTECT THE ENVIRONMENT FROM CONTAMINATION OR DAMAGE AS A CONSEQUENCE OF SNTP ACTIVITIES

PROGRAM SAFETY POLICIES

- SAFETY AND ENVIRONMENTAL PROTECTION WILL BE EXPLICITLY CONSIDERED AND INCORPORATED THROUGHOUT THE LIFETIME OF EVERY SNTP PROGRAM ACTIVITY.

- THE SNTP PROGRAM SHALL MEET ALL MANDATED, STATUTORY, AND LEGAL REQUIREMENTS FOR SAFETY AND ENVIRONMENTAL PROTECTION.

- ADDITIONALLY, EVERY PRACTICAL EFFORT SHALL BE MADE TO MAINTAIN RISKS DUE TO RADIATION AND TOXIC MATERIAL EXPOSURES AS LOW AS REASONABLY ACHIEVABLE (ALARA)

- COMPLIANCE WITH THESE REQUIREMENTS WILL BE BASED ON THE PRINCIPLES OF DEFENSE-IN-DEPTH INVOLVING MULTIPLE PHYSICAL, PROCEDURAL, AND ADMINISTRATIVE BARRIERS.
Space Nuclear Thermal Propulsion

EIS Process

DEIS PUBLIC HEARING COMMENTS

- NEPA PROCESS:
  -- INSUFFICIENT REVIEW PERIOD
  -- SCOPING COMMENTS NOT INCLUDED
  -- POSTPONE PENDING RELATED NEPA ACTIVITIES
  -- REQUESTED ADDITIONAL PUBLIC HEARINGS
  -- INAPPROPRIATE SCOPE
  -- INSTALLATIONS NOT EQUALLY REPRESENTED
  -- INSUFFICIENT STATEMENTS OF PURPOSE AND NEED

- PROVIDES OPTIONS FOR TESTING ALTERNATIVE FUELS
- REQUESTED CLARIFICATION RELATIVE TO INDEMNIFICATION
DEIS PUBLIC HEARING
COMMENTS (cont'd)

- QUESTIONED RELATIONSHIP TO PREVIOUS CLASSIFIED DOCUMENTS
- IMPACTS ON YUCCA MOUNTAIN NOT ANALYZED
- POTENTIAL IMPACTS ON EMPLOYMENT NOT ANALYZED
- ALTERNATIVES:
  -- PERSONNEL REQUIREMENTS UNDERESTIMATED
  -- ALL SUITABLE SITES HAVE NOT BEEN INCLUDED
  -- TRANSPORTATION ISSUES INADEQUATELY ADDRESSED
  -- METEOROLOGICAL PREREQUISITES NOT SPECIFIC
  -- NON-NUCLEAR ALTERNATIVES NOT CONSIDERED

DEIS PUBLIC HEARING
COMMENTS (cont'd)

- HAZARDOUS MATERIALS:
  -- HIGH LEVEL WASTE STREAM NOT IDENTIFIED
  -- TRU WASTE CERTIFICATION MISREPRESENTED
  -- WASTE REDUCTION TECHNIQUES NOT ADDRESSED
  -- WIPP CAPABILITIES OVER ESTIMATED
  -- SOME DISPOSAL METHODS ARE ILLEGAL
  -- LIQUID WASTE STREAMS NOT ANALYZED
  -- RCRA-LISTED WASTE NOT SPECIFIED
  -- LIMITS OF INEL RCRA-B EXCEEDED
  -- LDR WASTES NOT IDENTIFIED
- POTENTIAL GREENHOUSE EFFECT NOT ANALYZED
DEIS PUBLIC HEARING
COMMENTS (cont'd)

- PROPOSAL INSENSITIVE TO DESERT ECOLOGY
- NATIVE AMERICAN ISSUES NOT ADDRESSED
- GEOLOGY AND SOILS:
  - SEISMIC ACTIVITIES UNDERESTIMATED
  - VOLCANIC ACTIVITIES UNDERESTIMATED
  - FLOODING POTENTIAL UNDERESTIMATED
- WATER RESOURCES:
  - POTENTIAL DROUGHT EFFECTS NOT ANALYZED
  - GROUNDWATER UNCERTAINTIES NOT IDENTIFIED

DEIS PUBLIC HEARING
COMMENTS (cont'd)

- HEALTH AND SAFETY
  - ALARA PRINCIPLE NOT SUFFICIENTLY EXPLAINED
  - HEAT RELATED SAFETY ISSUES NOT IDENTIFIED
  - ACCIDENT ANALYSES NOT BOUNDING
  - INSUFFICIENT DESIGN DETAIL - CONTAINMENT & CONTROL
  - INSUFFICIENT DESIGN DETAIL - ETS
  - CONTROL ROOM HABITABILITY NOT DEFINED
  - INAPPROPRIATE CORRELATIONS TO CHEST X-RAYS
  - FALLOUT CONSEQUENCES TO FLORA/FAUNA NOT DISCUSSED
DEIS PUBLIC HEARING COMMENTS (cont'd)

o HEALTH AND SAFETY (cont'd):  
  -- HYDROGEN SAFETY ISSUES NOT ADEQUATELY ADDRESSED  
  -- HYDROGEN EMBRITTLEMENT ISSUES NOT CONSIDERED  
  -- CONSEQUENCES TO SOUTHERN UTAH NOT SPECIFIED  
  -- METHODS TO CALCULATE EXPOSURE NOT EXPLAINED  
  -- QUANTITY OF REACTOR CORES ON-SITE NOT SPECIFIED  
  -- REQUESTED A DISCUSSION OF MILK MONITORING PROGRAMS  
  -- CLARIFY HAZARDS OF LONG TERM LOW-LEVEL EXPOSURES

DEIS PUBLIC HEARING COMMENTS (cont'd)

o HEALTH AND SAFETY (cont'd):  
  -- NO-THRESHOLD-LEVEL CONCEPT NOT APPLIED  
  -- INVERSION LAYER EFFECTS ON Be RELEASES NOT DISCUSSED  
  -- BACKGROUND DOSES ARE TOO HIGH  
  -- LACK OF RAIL SYSTEMS NOT IDENTIFIED  
  -- PROGRAM BENEFITS NOT COMPARED TO RISKS  
  -- EFFECTS FROM HIGH VOLTAGE LINES NOT DISCUSSED  
  -- DOE SAR PROCESS INADEQUATE  
  -- 20% NESHAP REPRESENTS SIGNIFICANT INCREASES
DEIS PUBLIC HEARING
COMMENTS (cont'd)

o HEALTH AND SAFETY (cont'd)

-- 170 mRem LIMIT NOT EXPLAINED
-- CHARTS DO NOT SUPPORT DECREASING DOSE CLAIMS
-- 1980 CENSUS DATA USED FOR INEL
## SPACE NUCLEAR THERMAL PROPULSION PROGRAM

### EIS Schedule

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<th>Name</th>
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### NTP Technology

- Scoping Meeting - St. George (Holiday Inn)
- Scoping Meeting - Salt Lake (Red Lion Inn)
- Development Of EIS
- Chapter 1
- Draft PDEIS Chapters as Produced
- Receive SAR Process Information From Sandia
- Scoping Summary & Meeting (San Bernardino)
- Chapter 2
- Chapter 3
- Chapter 4
- Draft EIS
- Receive NTS Biocultural Surveys From DOE (DRI)

### Schedule Notes
- Critical
- Non-critical
- SNL Activities
## SPACE NUCLEAR THERMAL PROPULSION PROGRAM

**EIS SCHEDULE**

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**Additional Events**

- On-Board Review of PFEIS (San Bernardino)
- Policy and Security Review of EIS
- DOE Authorized Release for Public Review
- SAF/LLP Signature of Filing Letters
- Distribute to Libraries, Interested Parties
- AFICEVP Files DEIS with EPA
- Notice of Availability in Federal Register
- CEQ 30 Day Waiting Period
- Record of Decision