

Tritium Forum 2025 Aug 20, NukeWatch NM Comments and Concerns

NWNM Response to:

Flanged Tritium Waste Container Depressurization Independent Technical Report

August 12, 2025

https://cdn.lanl.gov/files/nnsa-ftwc-independent-technical-report-20250812-final_2f154.pdf

The Independent Technical Review should be reassessed after the Public Meeting and the Tribal Consultations. The public and tribal comments must be addressed and responded to.

The 40 alternatives must be listed.

1. Background

More history is needed. When were the FTWCs created? What was the original plan for disposal?

2. Approach for the Independent Technical Review

“This report uses the term “depressurize” to describe the controlled process to relieve pressure in the FTWCs headspace, i.e., controlled venting, and “vent” to describe the unplanned, unmitigated release of pressure from the FTWCs.”

Why do we need this difference?

3. Evaluation of Alternatives

“The contents are well documented, and calculations indicate that the FTWCs contain a flammable hydrogen/oxygen mixture and that the headspace pressure is estimated to increase at a rate of ~5 psi per year.”

What is the current psi?

3.3 Depressurize Then Transport

“The LANL team considered forty (40) different alternatives under these broad categories.”

These alternatives must be listed. Comparisons must be made.

4.1 Radiation Exposure to the Public

“CAP88 was designed for longer term or continuous releases. LANL is working to mitigate concerns about using it for a short-term release by using the more conservative of the wind conditions at the time of release and average conditions appropriate to continuous releases. LANL is in dialogue with EPA over this approach. CAP88 has relatively recently added the capability to calculate age-dependent radionuclide doses; however, EPA regulations do not require the use of the most restrictive values, and standard practice within the DOE and wider CAP88 user community is to use the adult values assumed in EPA regulations.”

Sounds like the CAP88 issue for short-term releases is not resolved. What were the concerns?

4.2 Worker Safety Considerations

“Standoff distances are established and increase with time as the FTWCs pressure increases.”

What are the current standoff distances?

4.3 Controlled Depressurization Process

‘During the evaluation, the SME inquired about off-normal events and possible problems that may occur, such as changes in weather conditions, or equipment failure. In those situations, operations will be paused and actions taken to ensure safe and stable conditions.

Who makes the decision?