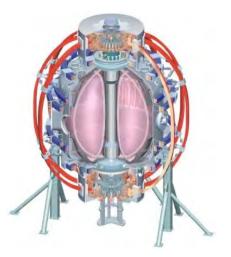




Environment, Safety & Health (ES&H)

Jerry Levine

Princeton Plasma Physics Laboratory
NSTX Upgrade Project
Office of Science Review
LSB, B318
December 15-16, 2009





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 Are Environment, Safety and Health (ES&H) aspects being properly addressed given the project's current stage of development?



NEPA

- Upgrades to the NSTX experiment had been addressed in the NSTX Environmental Assessment (DOE/EA-1108; FONSI issued 12/8/95), including plasma currents up to 2 MA and pulse lengths up to 60 sec.
- Formal request to DOE-PSO for Categorical Exclusion (CX) determination under 10CFR1021 (Appendix B, B3.13).
- CX determination for NSTX Upgrade Project granted by PSO NEPA Compliance Officer on 3/31/09.
- No further NEPA actions required.



NUCLEAR FACILITY HAZARD CLASSIFICATION

- Evaluation performed of projected NSTX nuclear facility hazard classification with upgrades in place.
- Evaluation indicates that NSTX with upgrades will remain Below Hazard Category 3 Facility; 10CFR830 Subpart B safety analysis requirements are not applicable.
- Assumes maximum of 4E18 DD neutrons/yr generated.
- NSTX Safety Certificate (operations authorization) for upgrades will address neutron generation limit.



NSTX-U ES&H Considerations

- Preliminary Hazards Analysis (PHA) prepared based on current plans using hazard analysis summary in current NSTX Safety Assessment Document (SAD).
- Expected environmental emissions:
 - 0.19 Ci/yr tritium from D-D fusion (site limit: 500 Ci/yr).
 - No 40CFR61 Subpart H (NESHAPS) issues.
 - 0.0005 mrem/yr at nearest business
 - Subpart H limit is 10 mrem/yr
 - EPA approval to construct required at 0.1 mrem/yr



NSTX-U ES&H Considerations

- Radiation exposure to public: 0.006 mrem/yr from tritium & direct radiation (site limit: 10 mrem/yr).
- Radiation exposure to workers: <1000 mrem/yr, <600 mrem/qtr (PPPL Policy); collective dose controlled ALARA.
- Compliance with occupational radiation exposure regulation (10CFR835) and DOE-approved PPPL Radiation Protection Program will be assured with PPPL Health Physics Division support.
- Radiological conditions post upgrade will be enhanced compared with current operations but well within previous PPPL experience (e.g., TFTR DD & DT, TFTR D&D).



NSTX-U ES&H Considerations

 Nonradiological hazards (e.g., electrical, fire, magnetic fields, RF, lithium, etc.) are expected to be comparable to present NSTX operations.



Integrated Safety Management (ISM)

 NSTX-U activities will be conducted using PPPL's wellestablished policies and procedures that apply the principles and core functions of ISM.

Project will follow the DOE approved ISM System
 Description (ISMS), which is incorporated into the DOE
 approved Worker Safety & Health Plan (WSHP) per
 10CFR851



Examples of PPPL ISM Elements to be Applied by NSTX-U

Hazard Controls

- Installation, test & operating procedures
- Design reviews
- Job hazard analyses (JHAs)
- Worker training
- Line managers & workers involvement & responsibility
 - Safety Training Observation Program (STOP™)
- Oversight by ES&H professionals



Examples of PPPL ISM Elements to be Applied by NSTX-U

- Assessment & Feedback
 - Line manager & facility manager walkthroughs & STOP™ audits
 - Laboratory Management Safety Walkthroughs
 - Internal audits
 - PSO surveillances
 - Plan-of-the-day meetings
 - Project team meetings



NSTX Safety Assessment Document (SAD)

- Existing NSTX Safety Assessment Document (SAD) will be revised prior to operating with upgrades
 - Descriptions of NSTX structures, systems and components (including upgrades), with emphasis on environment, safety and health (ES&H) features;
 - Identification of NSTX hazards and methods employed for their mitigation; and
 - A description of how operations will be conducted, with emphasis on ES&H features.



NSTX Activity Certification Committee (ACC)

- The existing independent joint PPPL/PSO "Activity Certification Committee", ACC will:
 - Conduct ES&H reviews of planned NSTX operations with the upgrades.
 - Make recommendations to PPPL management on whether to approve the start of NSTX operations with the upgrades.
 - Make recommendations to PPPL management on any restrictions or limitations associated with Upgrade operations (e.g., neutron generation limit).
- ACC is composed of senior engineers, physicist and ES&H professionals



Summary

The NSTX Upgrades Project is incorporating ES&H into its plans and activities, and will draw on the well-established ISM culture and infrastructure at PPPL.

