

# Defense Nuclear Facilities Safety Board

Washington, DC 20004

## Policy Statement

PS-6

Date: June XX, 2017

### Subject

Policy Statement on Oversight of Design and Construction of Defense Nuclear Facilities.

### Summary

This policy statement establishes the approach the Defense Nuclear Facilities Safety Board will take to review the design and construction of Department of Energy defense nuclear facilities.

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Sean P. Sullivan  
Chairman

## **I. Scope**

This policy describes how the Board fulfills its statutory duty to review design and construction of Department of Energy (DOE) defense nuclear facilities.

## **II. Background**

42 U.S.C. § 2286a(b)(4) states that the Board shall review the design of a new DOE defense nuclear facility before construction of such facility begins and shall recommend to the Secretary of Energy, within a reasonable time, such modifications of the design as the Board considers necessary to ensure adequate protection of public health and safety. During the construction of any such facility, the Board shall periodically review and monitor the construction and shall submit to the Secretary, within a reasonable time, such recommendations relating to the construction of that facility, as the Board considers necessary to ensure adequate protection of public health and safety. An action of the Board, or a failure to act, may not delay or prevent the Secretary from carrying out the construction of such a facility.

## **III. Definitions**

*Safety Item*—any type of nuclear safety deficiency (i.e., Safety Observation, Safety Issue, or Issue of Adequate Protection).

*Safety Observation*—a safety item that will not challenge adequate protection of public health and safety when the facility begins radiological operations. The Board may choose to communicate formally on these topics to provide independent advice and analysis to DOE.

*Safety Issue*—a safety item for which the Board requires additional information to assess whether it could challenge adequate protection of public health and safety when the facility begins radiological operations.

*Issue of Adequate Protection*—a safety item where the Board recommends corrective actions to ensure adequate protection of public health and safety when the facility begins radiological operations.

## **IV. Policy**

The Board shall review the design and construction of defense nuclear facilities as follows:

- Prioritize independent oversight activities using a systematic and graded approach that considers the:
  - hazards that may lead to accidental radiological uptake or exposure;
  - hazard categorization, project size, complexity, and schedule;
  - maturity of project technology; and

- Board's resource limitations.
- Execute independent oversight by performing reviews with defined scope and durations at specified and logical points in the process and document the review results in four formal reports to the Board:
  - conceptual design (including the Safety Design Strategy and the Conceptual Safety Design Reports);
  - final design (including Preliminary Documented Safety Analysis);
  - construction (including Quality Assurance Program, design compliance of a selective subset of installed safety systems, structures, and components, and specified Technical Safety Requirements); and
  - commissioning (a selective subset of safety programs including aspects of startup and testing, Technical Safety Requirements, and associated procedures).
- Conduct effective oversight by evaluating input from resident inspectors, staff reviews and observations, Board Member field visits, DOE project status briefings, and Board hearings to identify safety items. Commensurate with the type of safety item (see §III. Definitions):
  - Provide timely and formal communications to DOE so that the Board's independent advice, analysis, and recommendations may be factored into the normal DOE decision-making process to the maximum extent possible.
  - Track DOE's efforts and progress regarding safety items identified in formal communications from the Board. Tracking will cease once:
    - DOE formally communicates its decision regarding resolution of the safety items to the Board; and
    - the Board formally responds, nominally within 90 days, to DOE's communication.
  - Use any of the Board's statutory tools to inform DOE and the public of design or construction safety items.

**AFFIRMATION OF BOARD VOTING RECORD**

**SUBJECT: Policy Statement X, Oversight of Design and Construction of Defense Nuclear Facilities**

**Doc Control#2017-300-043**

The Board, with Board Member(s) Sean Sullivan, Bruce Hamilton, Jessie H. Roberson, Daniel J. Santos, Joyce L. Connery *approving*, Board Member(s) none *disapproving*, Board Member(s) none *abstaining*, and Board Member(s) none *not participating*, have voted to approve the above document on June 23, 2017.

The votes were recorded as:

	APRVD	DISAPRVD	ABSTAIN	NOT PARTICIPATING*	COMMENT	DATE
Sean Sullivan	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	06/22/17
Bruce Hamilton	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	06/20/17
Jessie H. Roberson	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	06/20/17
Daniel J. Santos	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	06/23/17
Joyce L. Connery	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	06/22/17

\*Reason for Not Participating:

This Record contains a summary of voting on this matter together with the individual vote sheets, views and comments of the Board Members.

  
Assistant Executive Secretary to the Board

Attachments:

1. Voting Summary
2. Board Member Vote Sheets

cc: Board Members  
OGC  
OGM Records Officer  
OTD

**Cameron Shelton**

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**From:** Sean Sullivan  
**Sent:** Thursday, June 22, 2017 3:53 PM  
**To:** Cameron Shelton; Shelby Qualls  
**Subject:** RE: Notational Vote: 2017-300-043, Policy Statement X, Oversight of Design and Construction of Defense Nuclear Facilities - BLUE FOLDER

Approved. No comments.

**From:** Cameron Shelton  
**Sent:** Tuesday, June 20, 2017 2:33 PM  
**To:** Bruce Hamilton [REDACTED]; Daniel J. Santos [REDACTED]; Jessie Roberson [REDACTED]; Joyce Connery [REDACTED]; Sean Sullivan [REDACTED]  
**Cc:** Glenn Sklar [REDACTED]; Katherine Herrera [REDACTED]; James Biggins [REDACTED]; Steven Stokes [REDACTED]; Richard Tontodonato [REDACTED]; Adam Poloski [REDACTED]; Chris Roscetti [REDACTED]; John Pasko [REDACTED]; Timothy Dwyer [REDACTED]; Matt Forsbacka [REDACTED]; Donita Vines [REDACTED] ExSec [REDACTED]  
**Subject:** Notational Vote: 2017-300-043, Policy Statement X, Oversight of Design and Construction of Defense Nuclear Facilities - BLUE FOLDER

This email is an electronic record of Notational Vote. Voting ballot will follow shortly. Also, accepting electronic votes.

**DEFENSE NUCLEAR FACILITIES SAFETY BOARD  
NOTATIONAL VOTE RESPONSE SHEET**

**FROM: Members of the Board**  
**SUBJECT: Policy Statement X, Oversight of Design and Construction of Defense Nuclear Facilities**

**DOC#2017-300-043**

**Approved** \_\_\_\_\_  
**Disapproved** \_\_\_\_\_  
**Abstain** \_\_\_\_\_  
**Recusal – Not Participating** \_\_\_\_\_

**COMMENTS:**

**Below** \_\_\_\_\_  
**Attached** \_\_\_\_\_  
**None** \_\_\_\_\_

Cameron Shelton  
Assistant Executive Secretary  
Office of the Chairman

**DEFENSE NUCLEAR FACILITIES SAFETY BOARD**  
**NOTATIONAL VOTE RESPONSE SHEET**

**FROM:** Bruce Hamilton

**SUBJECT:** Policy Statement X, Oversight of Design and Construction of Defense Nuclear Facilities

Doc Control#2017-300-043

Approved  X  Disapproved \_\_\_\_\_ Abstain \_\_\_\_\_

Recusal - Not Participating \_\_\_\_\_

COMMENTS: Below \_\_\_\_\_ Attached \_\_\_\_\_ None  X

  
Bruce Hamilton

20 JUNE 2017  
Date

**DEFENSE NUCLEAR FACILITIES SAFETY BOARD**  
**NOTATIONAL VOTE RESPONSE SHEET**

**FROM:** Jessie H. Roberson


**SUBJECT: Policy Statement X, Oversight of Design and Construction of Defense Nuclear  
Facilities**  
**Doc Control#2017-300-043**

**Approved**   X                        **Disapproved**                             **Abstain**       

**Recusal - Not Participating**       

**COMMENTS:**            **Below**   X      **Attached**                   **None**       

I respect that not all Board Members support the contents of the Definitions section, as it was added late in the Board's review process and should have been the subject of more dialog. If this policy is approved, the safety definitions would only apply to this policy and would require an affirmation vote of the Board to incorporate them into any other policy.

  
\_\_\_\_\_  
Jessie H. Roberson

  
\_\_\_\_\_  
Date

**DEFENSE NUCLEAR FACILITIES SAFETY BOARD**

**NOTATIONAL VOTE RESPONSE SHEET**

**FROM:** Daniel J. Santos

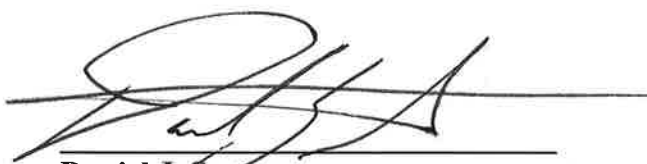
**SUBJECT:** Policy Statement X, Oversight of Design and Construction of Defense Nuclear Facilities

**Doc Control#2017-300-043**

Approved  Disapproved  Abstain

Recusal – Not Participating

**COMMENTS:** Below  Attached  None



Daniel J. Santos

6/23/17  
Date



**DEFENSE NUCLEAR FACILITIES SAFETY BOARD**  
**NOTATIONAL VOTE RESPONSE SHEET**

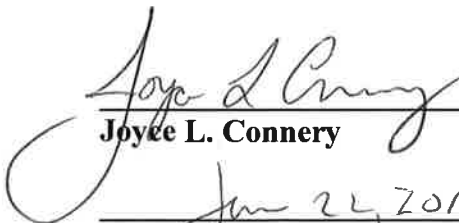
**FROM:** Joyce L. Connery

**SUBJECT:** Policy Statement X, Oversight of Design and Construction of Defense Nuclear Facilities

**Doc Control #2017-300-043**

**Approved**  **Disapproved**  **Abstain**   
**Recusal – Not Participating**

**COMMENTS:** **Below**  **Attached**  **None**

  
\_\_\_\_\_  
**Joyce L. Connery**  
\_\_\_\_\_  
**Date** Jun 24, 2017