

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

FISCAL YEAR 2020 WORK PLAN

August 2019

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DEFENSE NUCLEAR FACILITIES SAFETY BOARD

**FISCAL YEAR 2020
AGENCY PERFORMANCE GOALS**

FY2020 Performance Goals

The FY2020 Agency Performance Goals will be developed upon completion and finalization of the Agency's FY2020-FY2024 Strategic Plan.

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

Office of the Technical Director

**FISCAL YEAR 2020
OTD WORK PLAN**

Introduction. The Office of the Technical Director (OTD)¹ developed the Fiscal Year (FY) 2020 OTD Work Plan based on the Defense Nuclear Facilities Safety Board’s (Board) strategic plan and nuclear safety oversight mission. The plan discusses the oversight approach and planning for principal reviews and other high priority work.

Uncertainties. Uncertainties associated with the work plan are largely tied to Department of Energy (DOE) schedule changes, emerging work activities, and the potential for additional technical staff attrition. Historically, DOE schedule changes tend to result in delays, which may delay oversight activities throughout the year. Board direction and emergent DOE activities also drive the need to adjust the work plan. During FY 2020, OTD leadership will adjust schedules and work activities to reflect the Board’s priorities and maintain the quality of each review.

Planning Week. OTD staff held a three-day meeting July 16–18, 2019, focused on generating the OTD work plan. OTD management had two goals for Planning Week: increase staff engagement around development of the work plan, and decrease the duration for taking initial staff input and generating the work plan submitted to the Board. OTD management accomplished the latter goal by having multiple days focused solely on work planning. As to the former goal, Planning Week engaged the staff in the following ways: increasing transparency of the initial staff work plan input by having all oversight plan owners present their proposed reviews to the entire technical staff; increasing transparency of how management down-selects from the initial set of proposed reviews by showing the staff potential tradeoffs imposed by resource constraints; and increasing transparency in the formation of review teams by giving staff the opportunity to sign up for reviews.

Principal Reviews. For FY20, OTD staff identified a set of principal reviews that are high priority and require significant staff resources due either to the proposed depth or breadth of the activity. The principal reviews are distributed across the three technical groups and include scope in operating facilities, design and construction projects, and complex-wide programs.

Engineering Performance (EP). The work plan includes one review in the EP mission area. This work plan item captures OTD activities that focus on improving OTD management controls to achieve the Board’s mission efficiently and effectively.

Results. The proposed FY 2020 OTD Work Plan includes 48 new reviews and 37 FY19 carry-over reviews² turned on to start the year, including non-discretionary (ND) activities. Figure 1 provides an estimate of resources required for the reviews by OTD group, and Figure 2 shows a breakdown by site. Appendix A provides the complete list of reviews turned on in the work plan. The next three sections provide the planned reviews for each OTD group.

¹ Acronyms are defined in Appendix B.

² Carry-over reviews are reviews that were started in FY19 for which some level of effort will continue into FY20.

Figure 1: Work Plan Resource Loading by Technical Group

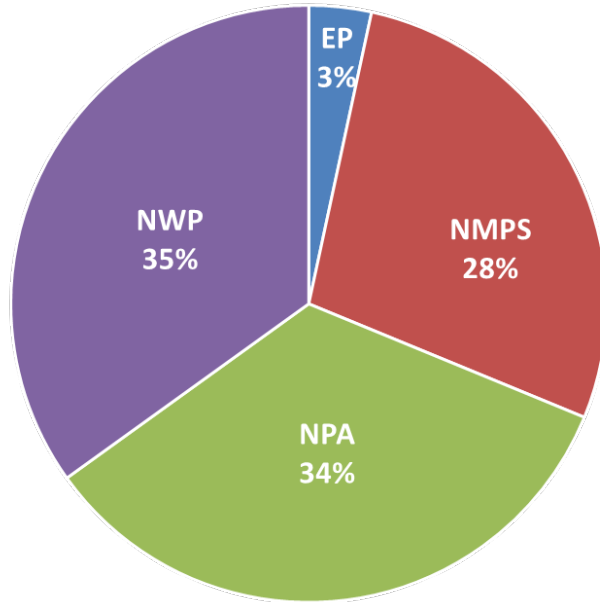
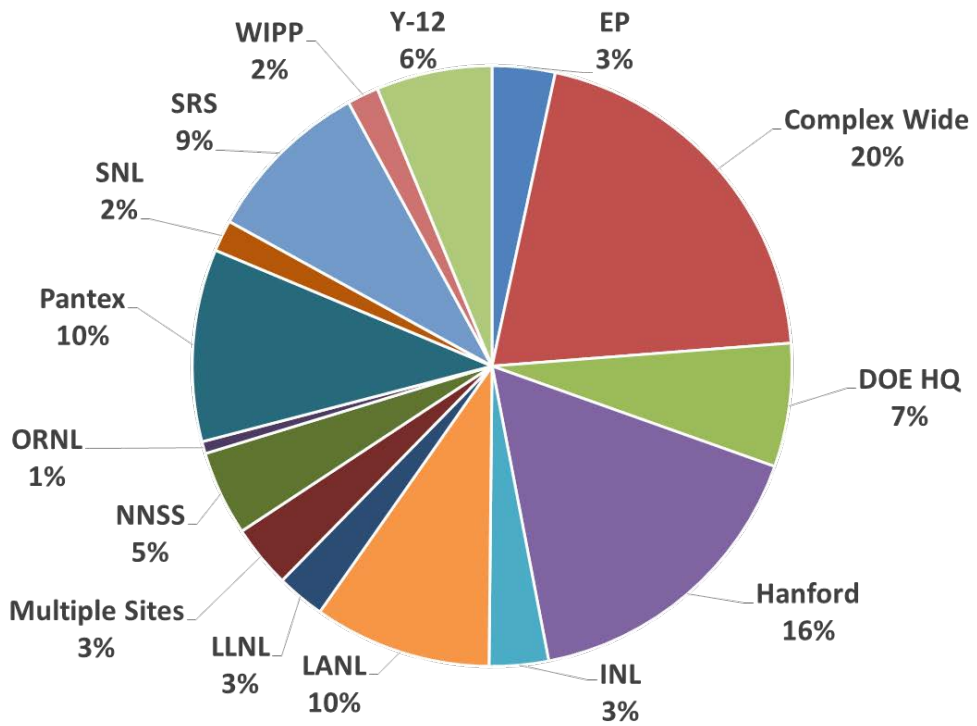


Figure 2: Work Plan Resource Loading by Site



Nuclear Weapon Programs (NWP).

OTD's NWP group performs independent and timely oversight of the safety of operations involving maintenance of the nuclear weapons stockpile, and of weapons-related research, development, and testing. NWP also conducts safety oversight of National Nuclear Security Administration (NNSA) design and construction projects in accordance with the Board's Policy Statement-6 (PS-6).

In FY 2020, NWP will conduct effective safety oversight through formal, well-planned reviews at NNSA defense nuclear facilities. In the course of these activities, NWP will assist the Board in notifying NNSA of potential safety items at NNSA defense nuclear facilities and in nuclear explosive operations, while maintaining a near-continuous oversight presence at Los Alamos National Laboratory (LANL), the Y-12 National Security Complex (Y-12), and the Pantex Plant. For LANL activities, OTD developed a single, integrated oversight plan that includes both NNSA and DOE Environmental Management (DOE-EM) activities. Table 1 identifies NWP reviews turned on in the work plan (principal reviews shown in bold).

Table 1 – Planned NWP Reviews

Priority	Title	Site	Carry-over
ND	ECSE PDSA Review	NNSS	No
ND	Evaluation of Recommendation 2019-1 Implementation Plan	Pantex	Yes
ND	Conceptual Design for Pantex Material Staging Facility	Pantex	Yes
ND	Savannah River Plutonium Processing Facility (SRPPF) CD-1 Review	SRS	No
ND	Evaluation of Recommendation 2019-2 IP	SRS	Yes
1	LANL Adequacy of Safety SSCs	LANL	No
1	Evaluation of Pantex Planned Improvements for Structural Issues	Pantex	No
2	PF-4 Leak Path Factor Upgrade Supporting Calculations Review	LANL	No
2	Aqueous Nitrate Restart Activities	LANL	No
2	PF-4 Updated Atmospheric Dispersion Analysis Review	LANL	No
2	TWF Safety Basis Review	LANL	Yes
2	Conduct of Operations/Training Review	LANL	Yes
2	PF-4 Seismic Performance Assessment	LANL	No
2	LLNL Building 332 Seismic Safety Review	LLNL	No
2	Waste Evaluation and Certification at LLNL	LLNL	No
2	DAF & NCERC Safety Basis Review	NNSS	Yes
2	DAF SSI Analysis Review	NNSS	No
2	Sitewide Safety Analysis Report and Control Implementation Review	Pantex	No
2	Electrical Tester Equipment Review	Pantex	Yes
2	Fire Protection Program Review	Pantex	Yes
2	Known State Operations Startup	Pantex	No
2	Tritium Facilities/TEF Combined DSA Review	SRS	Yes
2	Review of Aging Y-12 Facilities with Enduring Missions	Y-12	No

Priority	Title	Site	Carry-over
2	Y-12 Holdup Corrective Actions	Y-12	No
3	RLUOB DOE-STD-3009-2014 Safety Basis Review	LANL	Yes
3	12-96 HPFL Lead-in Replacement Construction Review	Pantex	Yes
3	W88 Weapon Response Technical Basis Review	SNL	No
3	UPF Equipment Procurement and Installation Review	Y-12	No
3	HEUMF USQ Review	Y-12	Yes
4	SRS Tritium Facilities Electrical Systems Review	SRS	Yes
4	Building 9215 DSA Review	Y-12	Yes

Nuclear Materials Processing and Stabilization (NMPS).

The NMPS group performs independent and timely oversight ensuring that the health and safety of the public are adequately protected as DOE disposes of excess radioactive materials, cleans up surplus defense nuclear facilities, and begins operation of new facilities. NMPS also conducts safety oversight of DOE-EM design and construction projects in accordance with PS-6.

NMPS will conduct effective safety oversight through formal, well-planned safety reviews at DOE-EM defense nuclear facilities. In the course of these activities, NMPS will assist the Board in notifying DOE of potential safety items at DOE defense nuclear facilities, while maintaining a near-continuous oversight presence at SRS and the Hanford Site. For SRS activities, OTD developed a single, integrated oversight plan that includes both NNSA and DOE-EM activities. Table 2 identifies NMPS reviews turned on in the work plan (principal reviews shown in bold).

Table 2 – NMPS High Priority Reviews

Priority	Title	Site	Carry-over
ND	WTP Analysis of Technical Issue Resolution	Hanford	No
ND	Recommendation 2012-2 Review	Hanford	No
ND	Recommendation 2012-1 Review	SRS	Yes
ND	SWPF Commissioning Plans	SRS	Yes
ND	Surplus Pu Disposition Optimization CD-1 Review	SRS	No
1	Solid Waste Storage and Processing	Complex Wide	Yes
1	ARP/AMWTP TRU Waste Tracking, Characterization, Monitoring, and Storage Operations	INL	No
1	SWPF Contractor and DOE ORR Review	SRS	Yes
1	H-Canyon DSA/TSR Rev 14 Review	SRS	Yes
2	SWOC/CWC DSA Review	Hanford	Yes
2	Building 324 Remediation (construction)	Hanford	Yes
2	WTP Safety Management Programs	Hanford	No
2	WTP Integration of Safety Bases for DFLAW	Hanford	No
2	WTP Safety Evaluation Process	Hanford	Yes
2	Building 324 Remediation (Radcon – Conops)	Hanford	No
2	DWPF Glycolic Acid Flowsheet Review	SRS	No
2	H-Canyon Exhaust Tunnel Structural Analysis	SRS	Yes
3	Tank and Pipeline Integrity (TAPI)	Hanford	No
3	PFM Demolition Oversight	Hanford	Yes
3	IWTU Preparations for Startup of Radiological Operations	INL	No
3	Transuranic Waste Processing Center SWSA-5 Oxidation Process	ORNL	Yes
4	WESF Capsule Storage System	Hanford	Yes
4	Procurement and Construction of SSCVS towards CD-4	WIPP	No

Nuclear Programs and Analysis (NPA)

The NPA group performs independent and timely oversight of the development, implementation, and maintenance of DOE regulations, requirements, and guidance for providing adequate protection of public health and safety at defense nuclear facilities, and the establishment and implementation of safety programs at defense nuclear facilities.

NPA is responsible for complex-wide programmatic review efforts addressing topics such as nuclear criticality safety, radiation protection, and emergency management. Several planned NPA activities will interface with and provide input to site-specific reviews planned within NWP and NMPS oversight plans. NPA also leads OTD review of DOE directives. Table 3 identifies NPA reviews turned on in the work plan (principal reviews shown in bold).

Table 3 – NPA Reviews

Priority	Title	Site	Carry-over
ND	Design and Construction Overview and Analysis	Complex Wide	No
ND	Staff Analysis of DOE Criticality Safety Annual Metrics	Complex Wide	No
ND	Summary of Major DNF EP&R Reviews and Lessons Learned	Complex Wide	Yes
ND	Review of EP&R and Assurance at major DNFs (Hanford)	Hanford	Yes
1	Assessment of DOE Oversight Effectiveness	Complex Wide	Yes
1	Maintenance and Reliability of Safety-Related SSCs	Complex Wide	No
1	Management of Aging Infrastructure	Complex Wide	No
1	Complex-wide Criticality Safety Evaluation	Complex Wide	No
1	Draft DOE Standard 5506, Preparation of Safety Basis Documents for Transuranic (TRU) Waste Facilities	DOE HQ	No
1	10 CFR 830 Revisions	DOE HQ	Yes
1	SMP reviews at Y-12 and Pantex	Multiple Sites	No
1	Review of EP&R at SNL	SNL	No
2	Reactive Nuclear Materials	Complex Wide	Yes
2	Implementation of Defense-In-Depth	Complex Wide	No
2	Dispersion Modeling	Complex Wide	No
2	TSR Implementation Reviews Analysis	Complex Wide	Yes
2	Status of PSHAs cited in DSAs	Complex Wide	No
2	DOE Handbook 3010-94, Airborne Release Fractions/Rates and Respirable Fractions for Nonreactor Nuclear Facilities	DOE HQ	No
2	DOE Standard 1228-2019, Preparation of Documented Safety Analysis for Hazard Category 3 DOE Nuclear Facilities	DOE HQ	No
2	LANL NCERC Operations Criticality Safety Program Review	NNSS	Yes
2	Y-12 Technical Deviation Process for Criticality Safety Control	Y-12	Yes
3	EP&R Exercise at INL	INL	No

Priority	Title	Site	Carry-over
3	EP&R Exercise at LANL	LANL	No
3	EP&R Exercise at Pantex	Pantex	No
3	EP&R Exercise at SRS	SRS	No
3	EP&R Exercise at WIPP	WIPP	No
4	Survey of Ventilation Systems and HEPA filter testing	Hanford	Yes
4	Review INL's Approach Using Risk-Informed Method to Assess Seismic Hazard Update	INL	Yes
6	Criticality Safety Benchmark Evaluation	Complex Wide	Yes

Appendix A. FY20 Reviews

Priority	Group	Title	Site	Carry-over
ND	NMPS	WTP Analysis of Technical Issue Resolution	Hanford	No
ND	NMPS	Recommendation 2012-2 Review	Hanford	No
ND	NMPS	RFBA 2018-300-066 Review of the safety approach to remove Pu-238 in Building 235-F	SRS	Yes
ND	NMPS	SWPF Commissioning Report	SRS	Yes
ND	NMPS	Surplus Pu Disposition Optimization CD-1 Review	SRS	No
ND	NPA	Design and Construction Overview and Analysis	Complex Wide	No
ND	NPA	Staff Analysis of DOE Criticality Safety Annual Metrics	Complex Wide	No
ND	NPA	Summary of Major DNF EP&R Reviews and Lessons Learned	Complex Wide	Yes
ND	NPA	Review of EP&R and Assurance at major DNFs (Hanford)	Hanford	Yes
ND	NWP	ECSE PDSA Review	NNSS	No
ND	NWP	Evaluation of Recommendation 2019-1 Implementation Plan	Pantex	Yes
ND	NWP	Conceptual Design for Pantex Material Staging Facility	Pantex	Yes
ND	NWP	Savannah River Plutonium Processing Facility (SRPPF) CD-1 Review	SRS	No
ND	NWP	Evaluation of Recommendation 2019-2 IP	SRS	Yes
1	NMPS	Solid Waste Storage and Processing	Complex Wide	Yes
1	NMPS	ARP/AMWTP TRU Waste Tracking, Characterization, Monitoring, and Storage Operations	INL	No
1	NMPS	SWPF Contractor and DOE ORR Review	SRS	Yes
1	NMPS	H-Canyon DSA/TSR Rev 14 Review	SRS	Yes
1	NPA	Assessment of DOE Oversight Effectiveness	Complex Wide	Yes
1	NPA	Maintenance and Reliability of Safety-Related SSCs	Complex Wide	No
1	NPA	Management of Aging Infrastructure	Complex Wide	No
1	NPA	Complex-wide Criticality Safety Evaluation	Complex Wide	No
1	NPA	Draft DOE Standard 5506, Preparation of Safety Basis Documents for Transuranic (TRU) Waste Facilities	DOE HQ	No
1	NPA	10 CFR 830 Revisions	DOE HQ	Yes
1	NPA	SMP reviews at Y-12 and Pantex	Multiple Sites	No
1	NPA	Review of EP&R at SNL	SNL	No
1	NWP	LANL Adequacy of Safety SSCs	LANL	No
1	NWP	Evaluation of Pantex Planned Improvements	Pantex	No
2	NMPS	SWOC/CWC DSA Review	Hanford	Yes
2	NMPS	Building 324 Remediation (construction)	Hanford	Yes
2	NMPS	WTP Safety Management Programs	Hanford	No
2	NMPS	WTP Integration of Safety Bases for DFLAW	Hanford	No
2	NMPS	WTP Safety Evaluation Process	Hanford	Yes
2	NMPS	Building 324 Remediation (Radcon – Conops)	Hanford	No
2	NMPS	DWPF Glycolic Acid Flowsheet Review	SRS	No
2	NMPS	H-Canyon Exhaust Tunnel Structural Analysis	SRS	Yes
2	NPA	Reactive Nuclear Materials	Complex Wide	Yes
2	NPA	Implementation of Defense-In-Depth	Complex Wide	No

Priority	Group	Title	Site	Carry-over
2	NPA	Dispersion Modeling	Complex Wide	No
2	NPA	TSR Implementation Reviews Analysis	Complex Wide	Yes
2	NPA	Status of PSHAs cited in DSAs	Complex Wide	No
2	NPA	DOE Handbook 3010-94, Airborne Release Fractions/Rates and Respirable Fractions for Nonreactor Nuclear Facilities	DOE HQ	No
2	NPA	DOE Standard 1228-2019, Preparation of Documented Safety Analysis for Hazard Category 3 DOE Nuclear Facilities	DOE HQ	No
2	NPA	LANL NCERC Operations Criticality Safety Program Review	NNSS	Yes
2	NPA	Y-12 Technical Deviation Process for Criticality Safety Control	Y-12	Yes
2	NWP	PF-4 Leak Path Factor Upgrade Supporting Calculations Review	LANL	No
2	NWP	Aqueous Nitrate Restart Activities	LANL	No
2	NWP	PF-4 Updated Atmospheric Dispersion Analysis Review	LANL	No
2	NWP	TWF Safety Basis Review	LANL	Yes
2	NWP	Conduct of Operations/Training Review	LANL	Yes
2	NWP	PF-4 Seismic Performance Assessment	LANL	No
2	NWP	LLNL Building 332 Seismic Safety Review	LLNL	No
2	NWP	Waste Evaluation and Certification at LLNL	LLNL	No
2	NWP	DAF & NCERC Safety Basis Review	NNSS	Yes
2	NWP	DAF SSI Analysis Review	NNSS	No
2	NWP	Sitewide Safety Analysis Report and Control Implementation Review	Pantex	No
2	NWP	Electrical Tester Equipment Review	Pantex	Yes
2	NWP	Fire Protection Program Review	Pantex	Yes
2	NWP	Known State Operations Startup	Pantex	No
2	NWP	Tritium Facilities/TEF Combined DSA Review	SRS	Yes
2	NWP	Review of Y-12 Facilities with Enduring Missions	Y-12	No
2	NWP	Y-12 Holdup Corrective Actions	Y-12	No
3	NMPS	Tank and Pipeline Integrity (TAPI)	Hanford	No
3	NMPS	PFP Demolition Oversight	Hanford	Yes
3	NMPS	IWTU Preparations for Startup of Radiological Operations	INL	No
3	NMPS	Transuranic Waste Processing Center SWSA-5 Oxidation Process	ORNL	Yes
3	NPA	EP&R Exercise at INL	INL	No
3	NPA	EP&R Exercise at LANL	LANL	No
3	NPA	EP&R Exercise at Pantex	Pantex	No
3	NPA	EP&R Exercise at SRS	SRS	No
3	NPA	EP&R Exercise at WIPP	WIPP	No
3	NWP	RLUOB DOE-STD-3009-2014 Safety Basis Review	LANL	Yes
3	NWP	12-96 HPFL Lead-in Replacement Construction Review	Pantex	Yes
3	NWP	W88 Weapon Response Technical Basis Review	SNL	No
3	NWP	UPF Equipment Procurement and Installation Review	Y-12	No
3	NWP	HEUMF USQ Review	Y-12	Yes
4	NMPS	WESF Capsule Storage System	Hanford	Yes
4	NMPS	Procurement and Construction of SSCVS towards CD-4	WIPP	No
4	NPA	Survey of Ventilation Systems and HEPA filter testing	Hanford	Yes

Priority	Group	Title	Site	Carry-over
4	NPA	Review INL's Approach Using Risk-Informed Method to Assess Seismic Hazard Update	INL	Yes
4	NWP	SRS Tritium Facilities Electrical Systems Review	SRS	Yes
4	NWP	Building 9215 DSA Review	Y-12	Yes
6	NPA	Criticality Safety Benchmark Evaluation	Complex Wide	Yes

Appendix B. Acronyms

Acronym	Full Name
AMWTP	Advanced Mixed Waste Treatment Project (INL)
ARP	Accelerated Retrieval Project (INL)
CD	Critical Decision
CFR	Code of Federal Regulations
Conops	Conduct of Operations
CWC	Central Waste Complex (CWC)
DAF	Device Assembly Facility (NNSS)
DFLAW	Direct Feed to LAW (Hanford)
DNF	Defense Nuclear Facility
DOE	Department of Energy
DOE-HQ	DOE Headquarters
DOE-EM	DOE Environmental Management
DSA	Documented Safety Analysis
DWPF	Defense Waste Processing Facility (SRS)
ECSE	Enhanced Capabilities for Subcritical Experiments (NNSS)
EP	Engineering Performance
EP&R	Emergency Planning and Response
FY	Fiscal Year
GSTR	Generator Site Technical Review
HEPA	High Efficiency Particulate Air
HEUMF	Highly Enriched Uranium Materials Facility (Y-12)
HPFL	High Pressure Fire Loop
INL	Idaho National Laboratory
IP	Implementation Plan
IWTU	Integrated Waste Treatment Unit (INL)
LANL	Los Alamos National Laboratory
LAW	Low Activity Waste
LLNL	Lawrence Livermore National Laboratory
NCERC	National Criticality Experiments Research Center (NNSS)
ND	Non-discretionary
NMPS	Nuclear Materials Processing and Stabilization
NNSA	National Nuclear Security Administration
NNSS	Nevada National Security Site
NPA	Nuclear Programs and Analysis
NWP	Nuclear Weapon Programs
ORNL	Oak Ridge National Laboratory

Acronym	Full Name
ORR	Operational Readiness Review
OTD	Office of the Technical Director
Pantex	Pantex Plant
PDSA	Preliminary Documented Safety Analysis
PF-4	Plutonium Facility (LANL)
PFPP	Plutonium Finishing Plant (Hanford)
PS-6	Policy Statement 6
PSHA	Probabilistic Seismic Hazard Analysis
Radcon	Radiological Control
RLUOB	Radiological Utility Office Building (LANL)
SMP	Safety Management Program
SNL	Sandia National Laboratory
SRPPF	Savannah River Plutonium Production Facility
SRS	Savannah River Site
SSC	Structures, systems, and components
SSCVS	Safety Significant Confinement Ventilation System (WIPP)
SSI	Soil Structure Interaction
STD	Standard
SWOC	Solid Waste Operations Complex (Hanford)
SWSA	Solid Waste Storage Area (ORNL)
SWPF	Salt Waste Treatment Facility (SRS)
TAPI	Tank and Pipeline Integrity
TEF	Tritium Extraction Facility (SRS)
TRU	Transuranic
TWF	Transuranic Waste Facility (LANL)
UPF	Uranium Processing Facility (Y-12)
USQ	Unreviewed Safety Question
WESF	Waste Encapsulation and Storage Facility (Hanford)
WIPP	Waste Isolation Pilot Plant
WTP	Waste Treatment & Immobilization Plant (Hanford)
Y-12	Y-12 National Security Complex

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

Office of the General Manager

**FISCAL YEAR 2020
OGM STRATEGIC PROJECTS LIST**

Introduction. The Office of the General Manager (OGM) provides direct support to the Board in the areas of Human Resources, Information Technology, Cyber Security, Operational Services, Physical Security, Contracting, Finance and Accounting, Facilities Support, Internal Controls, and Liaison with the Inspector General and other federal agencies. OGM supports the Technical Director and General Counsel and their staffs in the execution of the Board functions to provide oversight of Defense Nuclear Facilities. OGM consistently performs functions in the areas listed above to comply with all federal requirements.

Overview. OGM is currently staffed with one SES, two GS-15 Division Directors, and fifteen staff members. OGM is working to hire two additional GS-15 Division Directors, and four more staff members. OGM is authorized to fill the Deputy General Manager with a GS-15. OGM and the Agency rely on contracted support to cover administrative functions throughout the agency in addition to functions in the areas of Freedom of Information Act requests, Records Management, Accounting, and Human Resources. This is in addition to targeted support in the areas of Information Technology, Web Site Design, and SharePoint. The majority of the work OGM traditionally performs is non-discretionary, i.e., it fulfills federal requirements or is necessary for agency operations. This plan does not identify the non-discretionary work planned for Fiscal Year 2020. Rather, this plan provides a list of discretionary work that OGM will spearhead to achieve organizational improvement

OGM Planned Discretionary Work for FY 2020

Strategic Work

- Prepare Human Capital Plan
- Update 5 year IT strategic plan
- Conduct customer needs assessment to determine needs and expectations of customers
- Explore agency-wide knowledge management solutions

IT Upgrades & Governance

- Implement laptop hardware refresh for all users
- Migrate from Windows 7 to Windows 10
- Migrate from Skype for Business to Microsoft Teams
- Implement a Capital Planning and Investment Control (CPIC) plan
- Analyze all current IT tools for utility and efficiency

Training and Employee Engagement

- Enhance training for Government COR and Program Management certification requirements
- Award training and mentoring contract and initiate training classes
- Institutionalize Clifton Strengths concepts into performance plans
- Support NAPA in drafting “Communication and Change Management Implementation Strategy” and begin implementation in Q3-Q4 FY 20

Operational and Acquisitions Projects

- Move to electronic acquisitions process
- Upgrade and migrate OGM and OGC intranet content to SharePoint
- Enhance and update 20% of out-of-date directives and operating procedures

Security Projects

- Provide training on new limited area
- Complete CUI handbook and related training
- Purchase and install new panels agency-wide for Lenel entry system
- Update insider threat procedures

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

Office of the General Counsel

**FISCAL YEAR 2020
OGC STRATEGIC PROJECTS LIST**

Introduction. The Office of the General Counsel (OGC) provides direct legal support to the Board in the conduct of its oversight role. OGC supports the Technical Director and General Manger and their staff in the execution of the Board functions to provide oversight of Defense Nuclear Facilities. OGC is the repository of legal resources for the agency and manages the agency’s compliance with all legal requirements. The majority of work handled by OGC is to provide responsive legal support to the Board and the other two offices within the agency. OGC also has the lead on several important cross-cutting agency functions.

Overview. OGC is currently staffed with a Deputy General Counsel and three full-time attorneys. The General Counsel (SES) position is already authorized to be filled and a selection is pending. The office relies on contracted support to cover administrative functions within the office, including workload intake and processing, record processing, document preparation, and other administrative matters. The majority of the work OGC traditionally performs is non-discretionary, i.e., it is required by law or necessary for agency operation, or high priority, which includes direct mission work and Board-directed work. This plan does not identify the non-discretionary work planned for Fiscal Year 2020. Rather, this plan provides a list of discretionary work that OGC will spearhead to achieve organizational improvement – e.g. business process enhancements and office practices not required by law or regulation and not driven by Board direction.

OGC Planned Discretionary Work for FY 2020

Item	Description
Safety Allegations	Develop and implement a comprehensive Safety Allegations Program. This will include an internal Directive and Operating Procedure articulating how the DNFSB will process such allegations, as well as an outward-facing resource (webpage and/or guidance document) informing the public how to report a safety allegation. Once these documents are in place, OGC will conduct appropriate training for Board Members and staff.
Sunshine Act	Develop and implement Operating Procedures on closing meetings under the Government in the Sunshine Act, including the appropriate process to prepare Federal Register Notices and redact & post transcripts.
Ethics	Develop and implement an Operating Procedure on processing Board Member nominations. Develop and implement a policy statement or proposed regulation interpreting 42 U.S.C. § 2286(b)(3) (prohibition on Board Members having “any significant financial relationship” with DOE or any DOE contractor).
Knowledge Management	Review and update existing legal memos to ensure accurate and robust support of the Board’s mission. Prepare and publish an agency legal desk reference. Create Attorney Onboarding manual.
Workflow Enhancement	Reestablish an electronic OGC ticketing system that will allow the Board and staff to request legal support from OGC and track the status of such requests.

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

**FISCAL YEAR 2020
AGENCY STAFFING LIST**

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

FY2020 Agency Staffing List

Board		
	5 Board members	2 vacancies
	1 Special Assistant to the Chairman	
	1 Executive Director for Operations*	1 vacancy (Pending Legislation - Note 1)
	1 Equal Employment Opportunity Director	1 authorized in FY19 (selection pending)
	OGM is authorized to fill the 1 authorized in FY19.	
Office of the Technical Director		
	77 Total Staff	
	6 SES	2 vacancies (1 vacancy on hold*)
	1 SL	1 vacancy (1 vacancy on hold*)
	13 Resident Inspectors	3 vacancies
	57 General Engineers	7 authorized in FY19 (selections pending) 2 vacancies
	OTD is authorized to fill the 7 authorized in FY19 and the 8 vacancies listed and not on hold*.	
Office of the General Manager		
	25 Total Staff	
	1 SES	
	4 Division Directors & 1 Deputy GM	2 authorized in FY19 (selections pending) & 1 vacancy
	19 Staff	3 authorized in FY19 (selections pending) 1 vacancy
	OGM is authorized to fill the 5 authorized in FY19 and the 2 vacancies listed.	
Office of the General Counsel		
	5 Total Staff	
	1 SES	1 authorized in FY19 (selection pending)
	3 Attorneys & 1 Deputy GC	No vacancies
	OGC is authorized to fill the 1 vacancy listed.	
Note 1:	The Executive Director for Operations would be created and filled upon legislation from Congress directing this organizational change.	
Note 2:	The total number of people with all vacancies filled is 115. There are 2 Board member vacancies in addition to 12 staff vacancies (including the EDO pending legislation). Given the time required to post a position, hire for the position, onboard an individual, and the FY19 authorizations, this request translates conservatively to around 100 Full Time Equivalents.	
Note 3:	The Office Directors will hire individuals to replace existing staff members on a short term basis to be able to execute succession planning. For instance, where a critical management or unique engineering position retirement has been set for a future date, the Office Directors have flexibility to advance hire to fill that particular position and provide cross-over training to the incoming manager or expert without exceeding the total FTE.	
Note 4:	The Office Directors will not change the organizational structure. However, the Office Directors are authorized to move individual staff members between divisions (in OGM) and groups (in OTD) to be able to achieve the Agency's mission efficiently and effectively. OTD and OGC are authorized to hire four and two interns respectively.	
Note 5:	Appendix A to this Agency Staffing List shows OTD's justification for proposing three additional Resident Inspector Positions at LANL, Hanford, and SRS.	
Note 6:	The Office Directors are authorized to backfill existing positions as they become vacant.	
Hold*:	The EP SES and SL are not authorized to be hired until the 4th quarter FY2020. This will allow the hiring of the EDO and re-evaluation by the EDO of these positions.	

Agency Staffing List Appendix A

SUBJECT: Resident Inspector Staffing Evaluation for Fiscal Year 2020

Background. Resident Inspectors (RI) serve a vital function in the Board's safety oversight of DOE's defense nuclear facilities. As such, RI staff should be placed at DOE sites consistent with the Board's nuclear safety oversight priorities. In June 2017, the Office of the Inspector General recommended that the Board "develop and implement a formal, transparent process for annually determining which defense nuclear site will have resident inspectors, along with the staffing for those sites." On January 15, 2019, OTD staff documented initial results for the evaluation of RI staffing levels at DOE's defense nuclear facilities for calendar year 2019. This memo discusses an analysis of the previous recommended staffing levels and identifies recommended levels for fiscal year 2020.

Evaluation Process. The OTD RI staffing analysis process completed late in calendar year 2018 included a baseline analysis with the following key elements:

- Expert Panel – includes OTD staff and management with in-depth knowledge of Board priorities, RI roles and responsibilities, and DOE defense nuclear facilities. The panel included the Deputy Technical Director, Associate Technical Directors, senior technical staff, and current and former RIs.
- Site Factors – site information that drives the need for RIs (e.g., number of defense nuclear facilities, high hazard activities). A full list of site factors is provided in Attachment 1. The OTD cognizant engineers and RIs collected information for the site factors. This site factor information was provided to the expert panel.
- Panel Evaluation – based on the site factors and expert knowledge, the panel identified the preferred staffing levels along with minimum and maximum staffing levels.
- Panel Recommendations – the panel made recommendations for preferred RI staffing approach and alternative options that were consistent with the identified staffing levels.

OTD committed to perform an annual evaluation of RI staffing. The annual evaluation uses information from the baseline analysis and considers whether changes in Board priorities and site factors drive the need to re-perform a detailed analysis of RI staffing needs. The annual evaluation included:

- Changes in Site Factors – RIs and Site Cognizant Engineers considered whether there had been significant changes in site factors since the completion of the baseline analysis. Specifically, they considered whether DOE had made decisions that would significantly change RI oversight requirements for high-hazard activities at a site; whether a major operational event or accident occurred that has significant and long-lasting safety implications; and whether any other exigent circumstances had arisen that would challenge the basis for the existing distribution of RIs.
- Changes in Board Priorities – OTD management considered whether there had been significant changes in Board priorities, driven either by internal or external factors, since the completion of the baseline analysis. OTD management specifically considered whether changes to the Board's enabling legislation would impact the agency's oversight approach for RIs; whether changes to the Board's internal policies would impact the agency's oversight approach for RIs; and whether organizational or budgetary changes resulted in a significant change in allocation strategy of overall technical staff resources.

A full description of the process OTD staff followed to conduct this RI staffing evaluation is included in Attachment 2.

Discussion. This annual evaluation focuses on identifying any significant changes at DOE sites or within agency priorities that would argue for re-performing a detailed analysis of RI staffing at one or more sites. The results of the original baseline analysis are as follows:

Site	Panel Recommendation
Savannah River Site (SRS)	3 Resident Inspectors
Hanford	3 Resident Inspectors
Los Alamos National Laboratory (LANL)	3 Resident Inspectors
Y-12 National Security Complex (Y-12) and Oak Ridge Environmental Management	2 Resident Inspectors
Pantex Plant	2 Resident Inspectors
Idaho National Laboratory (INL)	Cognizant engineer coverage
Nevada National Security Site (NNSS)	Cognizant engineer coverage
Lawrence Livermore National Laboratory (LLNL)	Cognizant engineer coverage
Waste Isolation Pilot Plant (WIPP)	Cognizant engineer coverage
Sandia National Laboratories (SNL)	Cognizant engineer coverage

Annual Evaluation Results. OTD staff engaged the RIs and Site Cognizant Engineers, as well as the OTD management team, as described above and in Attachment 2 and as documented in Attachment 3. OTD staff found that there has not been a significant change in site factors over the past 12 months that would necessitate a detailed re-analysis of RI staffing. OTD staff further found that there have not been significant changes in Board priorities over the past 12 months that would necessitate a detailed re-analysis of RI staffing. OTD staff therefore conclude that a detailed re-analysis of RI staffing is unnecessary, and that the recommendations of the original baseline analysis are still valid. The recommended RI staffing levels remain as noted in the table above.

Attachment 1 – Site Factors

Category	Factor	What this Factor Helps Indicate?
Magnitude of oversight activities	1. Number of candidate defense nuclear facilities requiring active field oversight a. Hazard Category 2 b. Hazard Category 3 c. < Hazard Category 3	The number and relative hazards of facilities that may require RI coverage. The term “active” was meant to exclude facilities that are essentially dormant.
	2. Number of capital line item design and construction projects	The number and types of design and construction projects that may require RI coverage.
	3. Number of activities on startup notification reports for coming fiscal year a. Contractor readiness reviews b. Federal readiness reviews	The number and relative complexity of nuclear operations planned for startup or restart. RI coverage may be necessary to independently assess or provide oversight on the adequacy of the process for the readiness reviews.
	4. Number of emergency exercises on the approved Emergency Readiness Assurance Plan	The number of planned emergency exercises. RI coverage may be necessary to independently assess the exercises or provide oversight on the adequacy of their evaluation processes.
Drivers for oversight	5. Number of DOE Facility Representatives analyzed per DOE-STD-1063-2017 methodology as needed for the candidate defense nuclear facilities requiring active RI coverage.	DOE-STD-1063-2017 provides an analytical methodology used to derive DOE Facility Representative staffing needs based on the number of facilities, size, complexity of operations, and hazards. RI coverage functions are somewhat similar to DOE Facility Representatives and we expect the staffing numbers to scale similarly.
	6. Number taken from the safety bases (excluding onsite transportation) for: a. Safety class systems b. Significant systems c. Specific Administrative Controls d. Controls with Limiting Conditions of Operations	The number and type of safety controls is tied to the risks posed to onsite and public receptors. RI functions also involve assessment of safety system operations, maintenance, and surveillance, as well as execution of associated technical safety requirements and specific administrative controls.
	7. DOE Occurrence Reporting System (ORPS) reports from 2012-2016 associated with:	These ORPS numbers indicate past performance associated with both human and engineered elements of credited safety related controls. Poor performance may indicate the need for greater RI coverage to assess

Category	Factor	What this Factor Helps Indicate?
	<ul style="list-style-type: none"> a. Technical Safety Requirement (TSR) violations b. Safety System degradations c. Safety System actuations resulting from actual unsafe conditions 	compensatory measures and corrective actions, as well as provide greater independent oversight of TSR execution and vital safety system engineering.
	8. Number of potential inadequacies of the safety analysis (PISA) resulting in positive unreviewed safety questions (USQ) from 2012-2016	PISAs resulting in positive USQs may indicate immaturity of approved safety bases. RI coverage may be needed to assess compensatory measures and corrective actions, as well as independently assess the extent-of-condition at other facilities.
Degree of difficulty performing oversight activities	9. Maximum driving time in minutes between office and facilities (minutes)	Driving draws away time from other RI coverage functions.
	10. Number of DOE offices + prime contractors	Routine meetings with contractor and federal managers are expected and draw time away from other RI coverage functions.
	11. Number of facilities that typically have extra shift or weekend work	Extra shifts may require additional RI coverage.
	12. Number of facilities requiring two-person rule	Facilities with a two-person rule require at least two qualified persons for independent access. Therefore, a minimum of two RIs are necessary if true independent access is deemed necessary.
Other	Recommended range from current RIs/Cog Engineer	

Attachment 2 – Annual RI Staffing Evaluation Process

To conduct the annual evaluation of resident inspector distribution, management or their delegated reviewers will distribute the following list of questions to Resident Inspectors and Site Cognizant Engineers.

Questions for RIs and Cognizant Engineers:

Over the past year...

- 1) Have any major NNSA or DOE-EM decisions been made that would significantly change Resident Inspector oversight requirements for high-hazard activities at a site?
 - *Historical Examples: Removal of Security Cat I/II quantities of SNM from LLNL; Shutdown and de-inventory of the Rocky Flats Plant.*
- 2) Has a major operational event or accident occurred that has significant and long-lasting safety implications?
 - *Historical Example: WIPP radiological release.*
- 3) Have any other exigent circumstances arisen that challenge the basis for the existing distribution of Resident Inspectors?

Management or their designees will compile Resident Inspector and Site Cognizant Engineer input for evaluation. In addition, management or their designated reviewers will provide answers to the following questions.

Questions for OTD Management/delegated reviewers:

Over the past year...

- 1) Have changes been made to the Board's Enabling Legislation that impact the agency's mission or jurisdiction?
- 2) Have changes been made to the Board's internal policies that impact the agency's oversight approach for Resident Inspectors?
 - *Example: Issuance of a new Policy Statement.*
- 3) Have organizational or budgetary changes resulted in a significant increase, decrease, or change in allocation strategy of overall technical staff resources/FTEs?
 - *Example: Issuance of a reorganizational plan.*

'Yes' answers to any of the above should prompt management to consider whether a detailed reanalysis of Resident Inspector allocation is warranted. Management or their designated reviewers will prepare a memo documenting the results of the annual evaluation.

Attachment 3 – Annual RI Staffing Evaluation Results

The following table captures the input provided by RIs and Site Cognizant Engineers related to potential changes in site factors that could drive reconsideration of RI staffing levels.

	HFD	INL	LANL	LLNL	NNSS	Y-12	PX	SNL	SRS	WIPP
Have any major NNSA or DOE-EM decisions been made that would significantly change Resident Inspector oversight requirements for high-hazard activities at a site?	N	Y ²	N	N	N	N	N	N	Y ⁴	N
Has a major operational event or accident occurred that has significant and long-lasting safety implications?	N	Y ³	N	N	N	N	N	N	N	N
Have any other exigent circumstances arisen that challenge the basis for the existing distribution of Resident Inspectors?	N	N	N	N	N	N	N ¹	N	N ⁵	N

¹This response is assuming adequate headquarters technical staff coverage for specific review activities and for following Recommendation 2019-1.

²Potential shut down of Advanced Mixed Waste Treatment Project would decrease field oversight needs.

³The Accelerated Retrieval Project drum event occurred before the FY19 staffing evaluation, however the safety implications are now better understood.

⁴The potential for significant changes to the plutonium mission and the 235-F stoppage of de-inventory work have competing effects on the need for field oversight.

⁵This response is assuming adequate headquarters technical staff coverage for following Recommendation 2019-2.

The following captures the results of the management discussion of site factors and Board priorities.

- RI and Site Cognizant Engineer Input – The yeses and conditional noes on the above table do not argue for a more detailed analysis of RI staffing. For example, the yes responses for INL and SRS tend to have opposite effects on RI resources. The responses related to recommendations argue for adequate headquarters oversight, but do not fundamentally change the demands on RIs from field conditions.
- Changes in the Board’s Enabling Legislation – The Board’s enabling statute has not changed since November 2015. While the House and Senate versions of the 2020 National Defense Authorization Act contain potential changes to the Board’s statute, none of the proposed changes would directly impact RI staffing needs.
- Changes in the Board’s Internal Policies – The Board has not issued a new policy statement in the past 12 months. Implementation of Policy Statement 9, *Policy Statement on the Resident Inspector Program of the Defense Nuclear Facilities Safety Board*, has not impacted RI staffing.
- Organizational or Budgetary Changes – There have not been significant organizational or budgetary changes in the past 12 months that would impact RI staffing.

AFFIRMATION OF BOARD VOTING RECORD

SUBJECT: FY 2020 Work Plan

Doc Control#: 2019-300-0047

The Board acted on the above document on 09/24/2019. The document was Approved.

The votes were recorded as:

	APRVD	DISAPRVD	ABSTAIN	NOT PARTICIPATING	COMMENT	DATE
Bruce Hamilton	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	09/23/2019
Jessie H. Roberson	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	09/24/2019
Joyce L. Connery	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	09/24/2019

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

Nicholas Moore

Executive Secretary to the Board

Attachments:

1. Voting Summary
2. Board Member Vote Sheets

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

NOTATIONAL VOTE RESPONSE SHEET

FROM: Bruce Hamilton

SUBJECT: FY 2020 Work Plan

Doc Control#: 2019-300-0047

DATE: 09/23/2019

VOTE: Approved

COMMENTS:

None

Bruce Hamilton

DEFENSE NUCLEAR FACILITIES SAFETY BOARD
NOTATIONAL VOTE RESPONSE SHEET

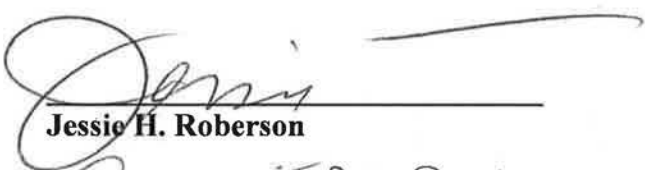
FROM: **Jessie H. Roberson**

SUBJECT: **FY 2020 Work Plan**

Doc Control#2019-300-047

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

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



Jessie H. Roberson
August 23, 2019

Date

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

NOTATIONAL VOTE RESPONSE SHEET

FROM: Joyce L. Connery

SUBJECT: FY 2020 Work Plan

Doc Control#: 2019-300-0047

DATE: 09/24/2019

VOTE: Approved

COMMENTS:

I think the process for this work plan has much improved and I appreciate the effort the staff went through. The comment I have for future plans is on the staffing plan--it would be good to have an analysis /justification for positions. This documentation will help as there is Board and Staff turnover.

Joyce L. Connery