

Thomas A. Summers, Acting Chairman  
Jessie H. Roberson  
Joyce L. Connery

**DEFENSE NUCLEAR FACILITIES  
SAFETY BOARD**

Washington, DC 20004-2901



The Honorable Dan Brouillette  
Secretary of Energy  
US Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585-1000

Dear Secretary Brouillette:

We received the National Nuclear Security Administration's letter dated June 5, 2020, and subsequent briefing on August 4, 2020, regarding the revised implementation plan for Board Recommendation 2019-1, *Uncontrolled Hazard Scenarios and 10 CFR 830 Implementation at the Pantex Plant*. The revised implementation plan addresses the concerns with the original plan that we identified in our October 28, 2019, letter and December 2019 public meeting. We find the revised implementation plan to be responsive and indicative of the Department of Energy's acceptance of Recommendation 2019-1.

With regard to sub-recommendation three, the Board maintains that—consistent with the hierarchy of controls established in DOE Standard 3009, *Preparation of Nonreactor Nuclear Facility Documented Safety Analysis*—additional engineered controls would prevent human-based operational accidents, such as falling technician and dropped equipment scenarios, more reliably than administrative controls. We advise DOE to consider adding or expanding the use of engineered controls such as transfer carts, where applicable, to allow elimination of both hand lifts of tools and swing arms in tooling.

The frequent and constructive staff-level interactions during the implementation plan revision process greatly facilitated productive discussion and resulted in a product that addressed our safety recommendations. We note such interactions as a best practice and hope to see them become more prevalent in the future, particularly during the development of implementation plans for Board Recommendations.

Yours truly,

Thomas A. Summers  
Acting Chairman

c: The Honorable Lisa E. Gordon-Hagerty  
Mr. Joe Olencz

**AFFIRMATION OF BOARD VOTING RECORD**

**SUBJECT:** Response to Revised Recommendation 2019-1 IP

**Doc Control#:** 2020-200-0008

The Board acted on the above document on 09/03/2020. The document was Approved.

The votes were recorded as:

	APRVD	DISAPRVD	ABSTAIN	NOT PARTICIPATING	COMMENT	DATE
Bruce Hamilton	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	09/01/2020
Thomas Summers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	09/03/2020
Jessie H. Roberson	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	09/03/2020
Joyce L. Connery	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	09/03/2020

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

*Shelby Qualls*

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:** Response to Revised Recommendation 2019-1 IP

**Doc Control#:** 2020-200-0008

**DATE:** 09/01/2020

**VOTE:** Disapproved

**COMMENTS:**

I do not support this correspondence for the reasons articulated in my comments on Doc#2019-200-014.

I therefore disapprove.

*Bruce Hamilton*

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

**FROM:** Thomas Summers

**SUBJECT:** Response to Revised Recommendation 2019-1 IP

**Doc Control#:** 2020-200-0008

**DATE:** 09/03/2020

**VOTE:** Approved

**COMMENTS:**

None

*Thomas Summers*

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

**FROM:** Jessie H. Roberson

**SUBJECT:** Response to Revised Recommendation 2019-1 IP

**Doc Control#:** 2020-200-0008

**DATE:** 09/03/2020

**VOTE:** Approved

**Member voted by email.**

**COMMENTS:**

None

*Jessie H. Roberson*

**DEFENSE NUCLEAR FACILITIES SAFETY BOARD**

**NOTATIONAL VOTE RESPONSE SHEET**

**FROM:** Joyce L. Connery

**SUBJECT:** Response to Revised Recommendation 2019-1 IP

**Doc Control#:** 2020-200-0008

**DATE:** 09/03/2020

**VOTE:** Approved

**Member voted by email.**

**COMMENTS:**

None

*Joyce L. Connery*