

DISPOSITION OF DOE COMMENTS ON DRAFT RECOMMENDATION 2015-1

DOE comment	Board response	Revised wording
<p>The draft Recommendation’s risk assessment states: “it is not possible to do a quantitative assessment of the risk of these [the Pantex Emergency Management Program] elements to provide adequate protection of the workers and the public.” As a point of clarification, the Department of Energy (DOE) demonstrates adequate protection of workers, the public and the environment as an integral part of operating a nuclear facility like that situated at the Pantex Plant. To this end, the Department has put in place a system of requirements, standards, policies and guidance that, when effectively implemented, not only provide reasonable assurance of adequate protection, but takes a very conservative approach to ensure such protection. Functions such as emergency management provide that additional conservatism and margin of protection. We are confident that, even with deficiencies identified by the DNFSB, the Pantex Emergency Management Program can perform its role to ensure this protection. Accordingly, DOE recommends removing the phrase: “in order to provide an adequate protection to the public and the workers” in justifying the need for the draft recommendation.</p>	<p>Upon review of Draft Recommendation 2015-1, in the noted phrase the word “provide” was used, whereas, in similar references to adequate protection in other parts of Draft Recommendation 2015-1, the word “ensure” was used. The Board voted to amend the language to reflect that the Recommendation is intended to ensure adequate protection.</p>	<p>Original wording of last sentence in first paragraph of the text of the Recommendation:</p> <p>“We believe that DOE and National Nuclear Security Administration (NNSA) must address these concerns in order to provide an adequate protection to the public and the workers at the Pantex Plant.”</p> <p>Revised wording:</p> <p>“We believe that DOE and the National Nuclear Security Administration (NNSA) must address these concerns in order to ensure the adequate protection of the public and the workers at the Pantex Plant.”</p>

<p>To increase protection assurances and drive improvement in an effective and efficient manner, I suggest that the best approach to address the concerns identified in your Draft Recommendation is to incorporate ongoing NNSA performance improvement initiatives and enhancements into the existing implementation plans for Recommendation 2014-1. This approach would enable the Department to take a holistic, integrated approach to making the needed improvements at Pantex.</p>	<p>As noted in the “Findings, Supporting Data, and Analysis” document of Draft Recommendation 2015-1, the problems identified in Draft Recommendation 2015-1 will not be adequately addressed by the Board’s Recommendation 2014-1, <i>Emergency Preparedness and Response</i>.</p>	<p>No change.</p>
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