

APPENDIX 4

REQUEST FOR BOARD ACTION BY A BOARD MEMBER

Requester: Board Member Bruce Hamilton

October 11, 2016

Brief description of Requested Action:

The Technical Director is directed to develop and implement a comprehensive and integrated scorecard of nuclear safety for the defense nuclear facilities. The scorecard shall be modeled on the NRC Reactor Oversight Process, recognizing that substantial differences will exist due to the greater heterogeneity of the weapons complex when compared to operating commercial power reactors as well as differences in USNRC and DNFSB regulatory frameworks. The final product will be designed for publication on the DNFSB public website no later than September 30, 2017, although the decision to publish the scorecard will be determined by a future vote of the Board.

The Technical Director will present the developing product to Board Members and senior agency staff at each weekly gathering for technical issues (i.e., "Tech Tuesday") beginning November 15, 2016, such that continuous ideas, suggestions, and challenges can facilitate an iterative development process throughout the course of fiscal year 2017.

The Technical Director will prepare a draft directive documenting the process and present it to the Board in Orange Folder no later than July 31, 2017.

Attachments (init) None (included clean version of any proposed document or modified document)

Summarize any time sensitive considerations:

Requestor signature s/ Bruce Hamilton

October 11, 2016

Executive secretary  ^{10/11/16} Click here to enter a date.

	APRVD	DISAPRVD	ABSTAIN	NOT PARTICPATING	COMMENT	DATE
Joyce L. Connery	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Jessie H. Roberson	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Sean Sullivan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Daniel J. Santos	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Bruce Hamilton	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____

Final Disposition Summary

Executive Secretary signature _____ Click here to enter a date.

AFFIRMATION OF BOARD VOTING RECORD

SUBJECT: Request for Board Action by Board Member, Bruce Hamilton; Task OTD to Develop a Comprehensive Scorecard of Nuclear Safety

Doc Control#2017-300-004

The Board, with Board Member(s) Sean Sullivan, Daniel J. Santos, Bruce Hamilton *approving*, Board Member(s) Joyce L. Connery, Jessie H. Roberson *disapproving*, Board Member(s) none *abstaining*, and Board Member(s) none *recusing*, have voted to approve the above document on October 13, 2016.

The votes were recorded as:

	APRVD	DISAPRVD	ABSTAIN	NOT PARTICIPATING*	COMMENT	DATE
Joyce L. Connery	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	10/13/16
Jessie H. Roberson	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	10/13/16
Sean Sullivan	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	10/12/16
Daniel J. Santos	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	10/12/16
Bruce Hamilton	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	10/13/16

*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.


Executive Secretary to the Board

Attachments:

1. Voting Summary
2. Board Member Vote Sheets

cc: Board Members
OGC
OGM Records Officer
OTD

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

NOTATIONAL VOTE RESPONSE SHEET

FROM: Joyce L. Connery

SUBJECT: Request for Board Action by Board Member, Bruce Hamilton; Task OTD to Develop a Comprehensive Scorecard of Nuclear Safety

Doc Control#2017-300-004

Approved _____

Disapproved

Abstain _____

Recusal – Not Participating _____

COMMENTS:

Below

Attached _____

None _____

While I understand the merits of transparency, the comparison here to the NRC and the commercial industry is flawed. The scope of the NRC's activities and their relationship to public trust is vastly different from that of the Board which oversees a Government entity charged with sensitive activities and information. Furthermore, there is no statutory direction to do so. The NRC's licensing activities for nuclear power plants and the possession and use of nuclear materials is subject to providing a hearing opportunity to any member of the public whose interest may be affected by the proceeding. Conversely, our role in advising the Secretary of Energy does not involve public licensing actions. Our statute instructs us to make recommendations available to the public for comment after they are provided to the Secretary of Energy. It also provides that we may evaluate information from members of the public. We do not have the same direct impact on the public that NRC's licensing activities have, and therefore do not share the same transparency objectives.

Given the size of our agency and the number of reviews we conduct, there would be no way to produce an accurate picture of the situation on the ground at any of the sites and we would risk creating a false sense of security, at a minimum.

I think this effort as stated is overly ambitious, and will divert scarce staff resources away from the safety mission.

The staff had already folded in a pilot program to see what could be done to satisfy this request.



Joyce L. Connery

10/13/16
Date

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

NOTATIONAL VOTE RESPONSE SHEET

FROM: Jessie H. Roberson

SUBJECT: Request for Board Action by Board Member, Bruce Hamilton; Task OTD to
Develop a Comprehensive Scorecard of Nuclear Safety

Doc Control#2017-300-004

Approved _____

Disapproved

Abstain _____

Recusal - Not Participating _____

COMMENTS:

Below

Attached _____

None _____

I do not believe this proposed tasking has adequate specificity and bounding of the expected elements of a potential scorecard and whose data is to be secured and used to input. Since there is little similarity that can be achieved when compared to the specific measured elements in NRC's Reactor Oversight Process, I fear significant staff time will be expended in exploration, to the detriment of actual field oversight.

Jessie H. Roberson
Jessie H. Roberson

Oct 13, 2016
Date

DEFENSE NUCLEAR FACILITIES SAFETY BOARD
NOTATIONAL VOTE RESPONSE SHEET

FROM: Sean Sullivan

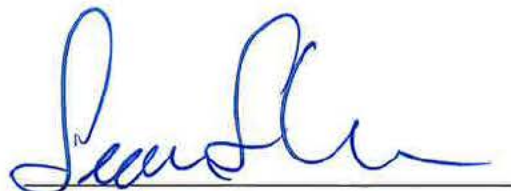
SUBJECT: Request for Board Action by Board Member, Bruce Hamilton; Task OTD to
Develop a Comprehensive Scorecard of Nuclear Safety

Doc Control#2017-300-004

Approved *✓* **Disapproved** **Abstain**

Recusal – Not Participating

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



Sean Sullivan

 10/12/16

Date

Lotus Smith

From: Daniel J. Santos
Sent: Wednesday, October 12, 2016 3:23 PM
To: Lotus Smith; Shelby Qualls
Subject: RE: Notational Vote: Doc#2017-300-004 Request for Board Action by Board Member, Bruce Hamilton; Task OTD to Develop a Comprehensive Scorecard of Nuclear Safety

Approved.

From: Lotus Smith
Sent: Wednesday, October 12, 2016 3:18 PM
To: Bruce Hamilton [REDACTED]; Daniel J. Santos [REDACTED]; Jessie Roberson [REDACTED]; Joyce Connery [REDACTED]; Sean Sullivan [REDACTED]
Cc: ExSec [REDACTED]
Subject: Notational Vote: Doc#2017-300-004 Request for Board Action by Board Member, Bruce Hamilton; Task OTD to Develop a Comprehensive Scorecard of Nuclear Safety

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: Request for Board Action by Board Member, Bruce Hamilton; Task OTD to Develop a Comprehensive Scorecard of Nuclear Safety

DOC#2017-300-004

Office Directors have provided their input

Approved _____
Disapproved _____
Abstain _____
Recusal – Not Participating _____

COMMENTS:

Below _____
Attached _____
None _____

Lotus Smith
Executive Secretary
Office of the Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Ave, NW, STE 700
Washington, DC 20004

DEFENSE NUCLEAR FACILITIES SAFETY BOARD
NOTATIONAL VOTE RESPONSE SHEET

FROM: Bruce Hamilton

SUBJECT: Request for Board Action by Board Member, Bruce Hamilton; Task OTD to
Develop a Comprehensive Scorecard of Nuclear Safety

Doc Control#2017-300-004

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

Recusal – Not Participating


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

This Request for Board Action directs the Technical Director to develop and implement a comprehensive and integrated scorecard of nuclear safety for the defense nuclear facilities. The scorecard shall be modeled on the NRC Reactor Oversight Process, recognizing that substantial differences will exist due to the greater heterogeneity of defense nuclear facilities when compared to operating commercial power reactors as well as differences in USNRC and DNFSB regulatory frameworks.

Completion of this task will provide the Board a tool for the coordinated evaluation and ranking of the concerns across the defense nuclear facilities. No such product currently exists, either at the DNFSB or at DOE. Lack of a comprehensive process challenges optimal resource allocation and makes it difficult for the public to ascertain whether and where concerns exist and how those concerns compare in terms of relative risk.

The U.S. NRC has had such a system for over a decade, and it has proven itself as a significant contributor to improved resource allocation and improved public transparency.

I therefore approve.


Bruce Hamilton

13 OCT 2016
Date