- 1. On page 13, in Table 3, delete all entries that begin with "Directives."
- 2. Within two weeks of approval of the OTD work plan, the staff shall provide a supplemental plan for review of DOE directives. The supplemental plan should utilize about the same percentage of staff resources as allocated in the OTD work plan that was submitted in Yellow Folder. The supplemental plan shall provide for review of DOE directives taking into account the following factors:
 - a. Significance of the directive to safety, and
 - b. Time since last DNFSB staff review of that directive.
- 3. The Board reserves the right to make changes to the supplemental plan. However, no followon vote is necessary unless a Board Member seeks to change the supplemental plan. In the absence of any Board changes the staff shall execute the supplemental plan.

Justification

The amendment seeks to divorce the DNFSB staff review of DOE directives from the DOE directives revision schedule.

AFFIRMATION OF BOARD VOTING RECORD

SUBJECT: Amendment by Chairman Sullivan to YELLOW FOLDER Doc#2017-300-115, OTD FY 18 Annual Work Plan

Doc Control#2017-300-115B

The Board, with Board Member(s) Sean Sullivan, Bruce Hamilton, Jessie H. Roberson *approving*, Board Member(s) Joyce L. Connery *disapproving*, Board Member(s) none *abstaining*, and Board Member(s) Daniel J. Santos *not participating*, have voted to approve the above document on October 6, 2017.

The votes were recorded as:

	APRVD	DISAPRVD	ABSTAIN	NOT PARTICIPATING*	COMMENT	DATE
Sean Sullivan	\boxtimes		\Box .			10/05/17
Bruce Hamilton	\boxtimes					10/05/17
Jessie H. Roberson	\boxtimes					10/06/17
Daniel J. Santos				\boxtimes	14	10/05/17
Joyce L. Connery		\boxtimes			\boxtimes	10/06/17

*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.

Comm Shlim

Assistant 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: Sean Sullivan

SUBJECT: Amendment by Chairman Sullivan to YELLOW FOLDER Doc#2017-300-115, OTD FY 18 Annual Work Plan

Doc Control#2017-300-115B

Approved_X_

Disapproved

Abstain____

Recusal – Not Participating

COMMENTS:

Below____ Attached____

None_X___

Comm Shhow

Sean Sullivan

10/05/2017

Date

Member voted by e-mail dated October 05, 2017.

DEFENSE NUCLEAR FACILITIES SAFETY BOARD NOTATIONAL VOTE RESPONSE SHEET

FROM: Bruce Hamilton

SUBJECT: Amendment by Chairman Sullivan to YELLOW FOLDER Doc#2017-300-115, OTD FY 18 Annual Work Plan

Doc Control#2017-300-115B

Approved X_

Disapproved_____

Abstain____

Recusal – Not Participating_____

COMMENTS:

Below____ Attached____

None_X__

Comment Salara to

Bruce Hamilton

10/05/2017

Date

Member voted by e-mail dated October 05, 2017.

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

NOTATIONAL VOTE RESPONSE SHEET

FROM: Jessie H. Roberson

SUBJECT: Amendment by Chairman Sullivan to YELLOW FOLDER Doc#2017-300-115, OTD FY 18 Annual Work Plan

Doc Control#2017-300-115B

Approved

Disapproved____

Abstain

Recusal – Not Participating

COMMENTS:

Below____ Attached_

None

Jessie H. Roberson 6 201

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

NOTATIONAL VOTE RESPONSE SHEET

FROM: Daniel J. Santos

SUBJECT: Amendment by Chairman Sullivan to YELLOW FOLDER Doc#2017-300-115, OTD FY 18 Annual Work Plan

Doc Control#2017-300-115B

Approved	Disa	pproved	Abstain			
Recusal – Not Participating X						
			a			
COMMENTS:	Below	Attached	None			

Daniel J. Santos

10

Date

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

NOTATIONAL VOTE RESPONSE SHEET

FROM: Joyce L. Connery

SUBJECT: Amendment by Chairman Sullivan to YELLOW FOLDER Doc#2017-300-115, OTD FY 18 Annual Work Plan

Doc Control #2017-300-115B

 Approved____
 Disapproved_X_
 Abstain____

Recusal – Not Participating_____

COMMENTS: Below_X_ Attached____ None____

I completely support the Board working to develop a Directive on Directives that will address Board Member concerns with how reviews are being conducted. I do not think an Amendment to the work plan is the appropriate way to achieve that objective. I prefer not to alter the work plan at the moment—particularly not in this manner, but to provide guidance to staff through the discussion and the creation of a policy on Directives that then could lead to resource changes in the work plan, which is not a static document.

My biggest concern is the viewpoint espoused at the public meeting that the Board should not review Directives before they are amended or issued. I believe that is flawed logic. I agree we should not ONLY review directives before they are issued, but we would be derelict, in my view, if we took the draconian position of NEVER reviewing a document during Rev Com.

Based on our statute, it is appropriate for the staff to review documents in their development phase and periodically afterwards to determine WHETHER/HOW they are being implemented, and if they are being implemented correctly, if they are having the intended effect on safety. The focus of any of the reviews should be on SAFETY issues and not on technical editing. I believe if the Board is willing to compromise, we could come to consensus on a policy that makes sense and serves the mission of the Agency to review and evaluate standards.

Date