

APPENDIX 4

REQUEST FOR BOARD ACTION BY A BOARD MEMBER

Requester: Daniel J. Santos September 6, 2018

Brief description of Requested Action:

Board Member Daniel J. Santos is requesting that:

1. Board Members approve sending the attached letter to the Secretary of Energy.
2. Posting the attached letter on the Board's public website following transmission to the Secretary of Energy.

Attachments (init) 1 (included clean version of any proposed document or modified document)

Summarize any time sensitive considerations:

Requestor signature signature on file September 6, 2018

Executive secretary signature on file September 6, 2018

	APRVD	DISAPRVD	ABSTAIN	NOT PARTICIPATING	COMMENT	DATE
Bruce Hamilton	<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"/>	_____
Daniel J. Santos	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Joyce L. Connery	<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.](#)

ARCHIVE: 2018-100-067, RFBA by Board Member Santos
to Approve Sending the Attached Letter re PS-9 to the Secretary of Energy

Bruce Hamilton, Acting Chairman

Jessie H. Roberson

Daniel J. Santos

Joyce L. Connery

**DEFENSE NUCLEAR FACILITIES
SAFETY BOARD**

Washington, DC 20004-2901



September XX, 2018

The Honorable James Richard Perry
Secretary of Energy
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-1000

Dear Secretary Perry:

On September 4, 2018, the Defense Nuclear Facilities Safety Board issued and made effective Policy Statement-9, *Policy statement on the Resident Inspector Program of the Defense Nuclear Facilities Safety Board*. This policy establishes key aspects of the Defense Nuclear Facilities Safety Board's approach to field oversight. We have enclosed a copy of this policy for your information.

Yours truly,

Bruce Hamilton
Acting Chairman

Enclosure

c: Mr. Joe Olencz

Defense Nuclear Facilities Safety Board

Washington, DC 20004

Policy Statement

PS-9

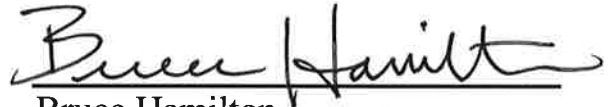
Date: September 5, 2018

Subject

Policy Statement on the Resident
Inspector Program of the Defense
Nuclear Facilities Safety Board.

Summary

This policy statement establishes
key aspects of the Defense
Nuclear Facilities Safety Board
approach to field oversight.



Bruce Hamilton
Acting Chairman

I. Background

The Defense Nuclear Facilities Safety Board's enabling statute establishes that the Board may assign staff to be stationed at any Department of Energy defense nuclear facility to carry out the functions of the Board.

II. Policy

- The Board will approve the appointment of each Resident Inspector, taking into consideration line management recommendations.
- Resident Inspectors shall undergo and successfully complete a formal, systematic training and qualification program in order to prepare them to perform on-site independent safety oversight. The training and qualification program shall ensure competency in areas including, but not limited to: (1) applicable DNFSB and DOE processes and requirements for work at defense nuclear facilities; (2) technical proficiency and expertise in conducting independent safety oversight; (3) interfaces and communications with the Board, DOE, contractor personnel, external entities, and the public; and (4) personal conduct and interpersonal effectiveness.
- The Resident Inspector Program shall include oversight of defined safety areas with assigned periodicities. Associated procedures shall be developed for the conduct of independent safety oversight of the safety areas within the given periodicities.
- The Resident Inspector Program shall contain a formal transition plan for each Resident Inspector to minimize any potential gaps in providing direct oversight at a defense nuclear site.
- The DNFSB internal control program shall include periodic assessments of the Resident Inspector Program.
- Resident Inspectors shall conduct frequent and direct safety oversight in accordance with the Resident Inspector Program and consistent with the priorities established by the Board.
- Resident Inspectors shall provide the Board with weekly reports suitable for public release that document their independent observations during the reporting period. They will provide more detailed information to the Board through technical briefings.
- Resident Inspectors shall provide input to the Board's annual report to Congress, summarizing the results of their independent safety oversight.

- Resident Inspectors shall serve a tour of duty of specified length greater than one year and no more than 5 years total associated with a defense nuclear site unless the Board approves an extension. Terms shall be staggered at each site to minimize potential gaps in providing direct oversight. This policy does not preclude Resident Inspectors from relocating for reasons such as reassignments.
- Line management is responsible for overseeing that Resident Inspectors conduct on-site activities at defense nuclear facilities as intended, in accordance with the Resident Inspector Program, and consistent with the priorities established by the Board. Line management shall periodically (e.g., once a quarter) visit defense nuclear sites to directly observe and assess the performance of Resident Inspectors.
- The Board's annual report to Congress shall describe the Board-approved Resident Inspector staffing levels at each defense nuclear site along with its basis.

AFFIRMATION OF BOARD VOTING RECORD

SUBJECT: RFBA by Board Member Santos to Approve Sending the Attached Letter re PS-9 to the Secretary of Energy

Doc Control#2018-100-067

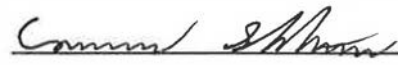
The Board, with Board Member(s) Bruce Hamilton, Jessie H. Roberson, Daniel J. Santos *approving*, Board Member(s) Joyce L. Connery *disapproving*, Board Member(s) none *abstaining*, and Board Member(s) none *not participating*, has voted to approve the above document on September 7, 2018.

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"/>	09/07/18
Jessie H. Roberson	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	09/06/18
Daniel J. Santos	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	09/07/18
Joyce L. Connery	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	09/07/18

*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: Bruce Hamilton

SUBJECT: RFBA by Board Member Santos to Approve Sending the Attached Letter re PS-9 to the Secretary of Energy

Doc Control#2018-100-067

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

Recusal – Not Participating

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


Bruce Hamilton

 7 SEPT 2018
Date

DEFENSE NUCLEAR FACILITIES SAFETY BOARD
NOTATIONAL VOTE RESPONSE SHEET


FROM: **Jessie Roberson**

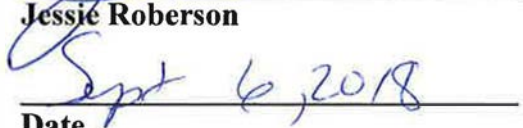
SUBJECT: **RFBA by Board Member Santos to Approve Sending the Attached Letter re
PS-9 to the Secretary of Energy**

Doc Control#2018-100-067

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

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



Jessie Roberson


Date

DEFENSE NUCLEAR FACILITIES SAFETY BOARD
NOTATIONAL VOTE RESPONSE SHEET


FROM: Daniel J. Santos

SUBJECT: RFBA by Board Member Santos to Approve Sending the Attached Letter re PS-9 to the Secretary of Energy

Doc Control#2018-100-067

Approved Disapproved _____ Abstain _____
Recusal – Not Participating _____

COMMENTS: Below _____ Attached _____ None



Daniel J. Santos
9/7/18

Date

DEFENSE NUCLEAR FACILITIES SAFETY BOARD
NOTATIONAL VOTE RESPONSE SHEET

FROM: Joyce Connery

SUBJECT: RFBA by Board Member Santos to Approve Sending the Attached Letter re PS-9 to the Secretary of Energy

Doc Control#2018-100-067


Approved _____ Disapproved X Abstain _____

Recusal – Not Participating _____

COMMENTS: Below X Attached _____ None _____

This policy statement is an internal policy about how the Board manages its Resident Inspectors and does not describe any guidance with regards to how the Resident Inspectors interact with the Department of Energy. I do not see a reason that we would send the document to the Secretary of Energy. We are an independent agency responsible for our own conduct. If we wish to communicate our internal policies to the Department as a matter of clarity, we can transmit through the Departmental Representative's office or simply publish on our website.

This letter also further reinforces the unhealthy practice of submitting an RFBA without discussion among Board Members as to its content and makes no effort to justify the action. (Note: the underlying document was socialized with Board Members and comment was solicited.)



Joyce Connery
Sept 7, 2018

Date