

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

**DEFENSE NUCLEAR FACILITIES
SAFETY BOARD**

Washington, DC 20004-2901



September 16, 2020

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

Thomas A. Summers
Acting Chairman

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