

Delete the following sentences from the letter:

Further, the safety bases rely on a probabilistic analysis that lacks a sufficient technical basis to calculate the frequency of seismically induced fires, which may artificially lower the probability of occurrence. When corrected, the estimated accidental radiological dose consequences and frequency reflected in several safety basis documents could increase significantly and, as a result, may require additional safety-related controls to protect the public or worker. Accordingly, we stress that revisions to these calculations should be completed expeditiously.

Justification:

The letter as received in Yellow Folder by the staff is disjointed. The first three sentences say the contractor decided to do a good thing, while the next three (which this amendment would delete) come across as a stern warning. In addition, the last two sentences (“When corrected, ... these calculations should be completed expeditiously.”) come pretty close to meeting the requirement for a formal recommendation.

If approved, this amendment leaves in place a straightforward letter asking for the scope and schedule of the review plan. The issues raised in the deleted sentences can be discussed between Board staff and NNSA staff, and a second Board communication could follow if we are unsatisfied.

Lotus Smith

From: Mark Welch
Sent: Tuesday, March 31, 2015 4:47 PM
To: Lotus Smith; Steven Stokes; John Batherson; Daniel J. Santos; Jessie Roberson; Sean Sullivan
Cc: Alicia Proctor
Subject: RE: Doc#2015-063A Amendment by Board Member, Sean Sullivan to Yellow Folder Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting Safety Bases at the Pantex Plant 24-Hour Review

There are no administrative issues associated with this amendment.

From: Lotus Smith
Sent: Tuesday, March 31, 2015 4:21 PM
To: Steven Stokes; John Batherson; Mark Welch; Daniel J. Santos; Jessie Roberson; Sean Sullivan
Cc: Alicia Proctor; Lotus Smith
Subject: Doc#2015-063A Amendment by Board Member, Sean Sullivan to Yellow Folder Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting Safety Bases at the Pantex Plant 24-Hour Review

TO: Office Directors/Board Members
FROM: Executive Secretary
SUBJECT: Amendment by Board Member, Sean Sullivan to Yellow Folder Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting Safety Bases at the Pantex Plant 24-Hour Review

Doc Control#: 2015-063A

Please be advised that Board Member, Sean Sullivan, has submitted an amendment to Yellow Folder Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting Safety Bases at the Pantex Plant 24-Hour Review.

Attached is the Amendment request and Yellow Folder: Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting Safety Bases at the Pantex 24-Hour Review.

For the purpose of tracking amendments, this document is Doc#2015-063A Amendment by Board Member, Sean Sullivan to Yellow Folder Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting Safety Bases at the Pantex Plant 24-Hour Review.

Office Directors, please respond to this email with your inputs.

REF. Board Procedures;

- e) As soon as practicable, the Board Members should receive input from the Office Directors as to whether any technical, legal, or administrative issue is raised by the amendment. The Office Directors should not comment on the writing style or tone of the amendment text, or the underlying policy issues raised by the amendment, unless specifically asked to do so by a Member;

One business day after issue of this amendment, a notational vote ballot will be distributed to Board Members on this amendment.

Lotus Smith

From: John Batherson
Sent: Wednesday, April 01, 2015 8:02 AM
To: Lotus Smith; Steven Stokes; Mark Welch; Daniel J. Santos; Jessie Roberson; Sean Sullivan
Cc: Alicia Proctor
Subject: RE: Doc#2015-063A Amendment by Board Member, Sean Sullivan to Yellow Folder Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting Safety Bases at the Pantex Plant 24-Hour Review

Reviewed. There are no legal issues presented by the proposed amendment.

From: Lotus Smith
Sent: Tuesday, March 31, 2015 4:21 PM
To: Steven Stokes; John Batherson; Mark Welch; Daniel J. Santos; Jessie Roberson; Sean Sullivan
Cc: Alicia Proctor; Lotus Smith
Subject: Doc#2015-063A Amendment by Board Member, Sean Sullivan to Yellow Folder Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting Safety Bases at the Pantex Plant 24-Hour Review

TO: Office Directors/Board Members
FROM: Executive Secretary
SUBJECT: Amendment by Board Member, Sean Sullivan to Yellow Folder Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting Safety Bases at the Pantex Plant 24-Hour Review

Doc Control#: 2015-063A

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Office Directors, please respond to this email with your inputs.

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One business day after issue of this amendment, a notational vote ballot will be distributed to Board Members on this amendment.

Alicia Proctor

From: Steven Stokes
Sent: Wednesday, April 01, 2015 5:47 PM
To: Lotus Smith; John Batherson; Mark Welch; Daniel J. Santos; Jessie Roberson; Sean Sullivan
Cc: Alicia Proctor
Subject: RE: Doc#2015-063A Amendment by Board Member, Sean Sullivan to Yellow Folder Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting Safety Bases at the Pantex Plant 24-Hour Review

OTD has the following concern:

The proposed deletion removes context from the letter such that the recipient will not be able to understand the potential safety issue represented by the conditions at Pantex. Please note, CNS only committed to looking at dispersion, and it is not clear that the review plan would include the frequency calculation, which also needs to be revised. Additionally, absent this explanatory material, the remaining text amounts to effectively an information request, which the staff is empowered to file at the working level (from staff direct to NPO).

Steven A. Stokes
Technical Director
Defense Nuclear Facilities Safety Board
202-694-7143

From: Lotus Smith
Sent: Tuesday, March 31, 2015 4:21 PM
To: Steven Stokes; John Batherson; Mark Welch; Daniel J. Santos; Jessie Roberson; Sean Sullivan
Cc: Alicia Proctor; Lotus Smith
Subject: Doc#2015-063A Amendment by Board Member, Sean Sullivan to Yellow Folder Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting Safety Bases at the Pantex Plant 24-Hour Review

TO: Office Directors/Board Members
FROM: Executive Secretary
SUBJECT: Amendment by Board Member, Sean Sullivan to Yellow Folder Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting Safety Bases at the Pantex Plant 24-Hour Review

Doc Control#: 2015-063A

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YELLOW FOLDER Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting Safety Bases at the Pantex Plant 24-Hour Review

The Honorable Frank G. Klotz
Administrator
National Nuclear Security Administration
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Dear Administrator Klotz:

The purpose of this letter is to seek information regarding a planned review of the Pantex Plant safety bases by Consolidated Nuclear Security, LLC (CNS). We understand that CNS plans to conduct a comprehensive review of all legacy dispersion calculations that support the Pantex Plant safety bases, including a review of input assumptions, techniques, and calculation methods. We support this effort as many of the existing supporting analyses are outdated and contain radiological dose consequence calculations that use non-conservative assumptions and input parameters that lack technical justification. Further, the safety bases rely on a probabilistic analysis that lacks a sufficient technical basis to calculate the frequency of seismically induced fires, which may artificially lower the probability of occurrence. When corrected, the estimated accidental radiological dose consequences and frequency reflected in several safety basis documents could increase significantly and, as a result, may require additional safety-related controls to protect the public or worker. Accordingly, revisions to these calculations should be completed expeditiously.

Pursuant to 42 U.S.C. § 2286b(d), the Board requests a report within 90 days from receipt of this letter that contains the review plan, including scope and schedule, for identifying and updating potentially deficient calculations that support the Pantex Plant safety bases.

Sincerely,

Jessie H. Roberson
Vice Chairman

c: Mr. Matthew B. Moury
Mr. Steven C. Erhart
Mr. Joe Olencz

TECHNICAL STAFF CONCURRENCE/RECORD NOTE PAGE				
SUBJECT:		Review of Atmospheric Dispersion Methodologies Supporting Safety Bases at the Pantex Plant		
AUTHOR:		M. Dunlevy	REPORT:	Board Letter
AFFECTED SITES:		Pantex		
<u>Contributor(s):</u>		<u>Date Received:</u>	<u>Concurrence Signature/Date:</u>	
M. Dunlevy				
F. Bamdad				
T. Spatz				
<u>Project Leader(s)/Cognizant Engineer(s):</u>		<u>Date Received:</u>	<u>Concurrence Signature/Date:</u>	
R. Arnold				
<u>Group Leader(s):</u>		<u>Date Received:</u>	<u>Concurrence Signature/Date:</u>	
T. Dwyer				
<u>Outside Expert(s):</u>		<u>Date Received:</u>	<u>Concurrence Signature/Date:</u>	
Document Number:			Report File:	Vines, D.
STAFF RECORD NOTES				
	<u>1st Edit Date</u>	<u>Return Date</u>	<u>2nd Edit Date</u>	<u>Return Date</u>
1. To Technical Editor:	1/20/2015	1/20/2015		
2. Submitted for classification review on:				
3. DOE classification review completed on:				
4. Author agrees that document is ready for the Board:				
5. Copies provided to the Board members:				
Record Note:				
DNFSB STRATEGIC PLAN REFERENCE NUMBER				
AUTHOR'S LAST NAME	Dunlevy	SECRETARY'S LAST NAME	Fleet	DATE
FILE NAME	H:\HOME\TRANSFEROTD\LETTERS\NWP\FY15\BL.FY15.NWP.PANTEX DISPERSION.R0.DOCX			

RECORDS CONCURRENCE FORM

NUMBER	FY2015-	SUBJECT	Review of Atmospheric Dispersion Methodologies Supporting Safety Bases at the Pantex Plant
GROUP LEADER CONCURRENCE (Signature and Date)			
DNFSB STRATEGIC ACTION PLAN REFERENCE:			

TECHNICAL CONCURRENCE	
TECHNICAL EDITOR	TECHNICAL DIRECTOR
NAME: D. CAMPBELL	NAME: S.A. STOKES
INITIALS:	INITIALS:
DATE:	DATE:

GENERAL MANAGER CONCURRENCE
GENERAL MANAGER
NAME: M. T. WELCH
INITIALS:
DATE:

LEGAL CONCURRENCE
ACTING GENERAL COUNSEL
NAME: R. N. REBACK
INITIALS:
DATE:

DEPUTY TECHNICAL DIRECTOR FOR SITE REPS
NAME: R.E. TONTODONATO
INITIALS:
DATE:

BOARD BRIEFING BRIEF TO BOARD MEMBERS
NAME: S.A. STOKES
INITIALS:
DATE:

CLASSIFICATION CHECK		
DNFSB SECURITY MICHAEL LEGGETT		
DOCUMENT #1	DOCUMENT #2	DOCUMENT #3
DNFSB CONTROL NUMBER	DNFSB CONTROL NUMBER	DNFSB CONTROL NUMBER
DATE CLEARED BY DOE	DATE CLEARED BY DOE	DATE CLEARED BY DOE
INITIALS	INITIALS	INITIALS
DATE	DATE	DATE

BOARD MEMBERS (5), W/ ENCLOSURE
OGC, W/ ENCLOSURE
OGM, W/ ENCLOSURE
OTD, W/ ENCLOSURE
SITE REPS, W/ ENCLOSURE (EMAIL)
ARCHIVES/CHRON.,(2), W/ ENCLOSURE
LOG KEEPER, W/ ENCLOSURE

TRANSFER FILE NAME	H:\Home\TransferOTD\Letters\NWP\FY15\BL.FY15.NWP.Pantex Dispersion.r0.docx
SECRETARY/AUTHOR	Fleet/Dunlevy
RELEASED FOR DISTRIBUTION ON	

AFFIRMATION OF BOARD VOTING RECORD

SUBJECT: Amendment by Board Member, Sean Sullivan to Yellow Folder Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting Safety Bases at the Pantex Plant 24-Hour Review

Doc Control#2015-063A

The Board, with Board Member(s) Sean Sullivan, Daniel J. Santos *approving*, Board Member(s) Jessie H. Roberson *disapproving*, Board Member(s) none *abstaining*, and Board Member(s) none *recusing*, have voted to approve the above document on April 2, 2015.

The votes were recorded as:

	APRVD	DISAPRVD	ABSTAIN	RECUSAL	<u>NO VOTE*</u>	COMMENT	DATE
Jessie H. Roberson	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	04/02/15
Sean Sullivan	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	04/02/15
Daniel J. Santos	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	04/02/15

*Reason for "No Vote

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: Jessie H. Roberson

SUBJECT: Amendment by Board Member, Sean Sullivan to Yellow Folder Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting Safety Bases at the Pantex Plant

Doc Control#2015-063A

Approved _____

Disapproved X

Abstain _____

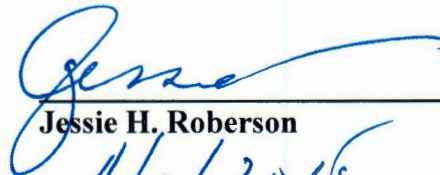
Recusal – Not Participating _____

COMMENTS:

Below _____

Attached _____

None X



Jessie H. Roberson
4/2/2015

Date

DEFENSE NUCLEAR FACILITIES SAFETY BOARD
NOTATIONAL VOTE RESPONSE SHEET

FROM: Sean Sullivan

SUBJECT: Amendment by Board Member, Sean Sullivan to Yellow Folder Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting Safety Bases at the Pantex Plant

Doc Control#2015-063A

Approved *X* Disapproved Abstain
Recusal – Not Participating

COMMENTS: Below *X* Attached None

See the justification, attached.



Sean Sullivan

4/2/15

Date

Alicia Proctor

From: Daniel J. Santos
Sent: Thursday, April 02, 2015 3:36 PM
To: Alicia Proctor
Subject: RE: Notational Vote: Doc#2015-63A Amendment by Board Member, Sean Sullivan to Yellow Folder Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting safety Bases at the Pantex Plant

Approved without comment.

From: [Alicia Proctor](#)
Sent: 4/2/2015 8:20 AM
To: [Jessie Roberson](#); [Sean Sullivan](#); [Daniel J. Santos](#)
Cc: [Alicia Proctor](#); [Lotus Smith](#)
Subject: Notational Vote: Doc#2015-63A Amendment by Board Member, Sean Sullivan to Yellow Folder Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting safety Bases at the Pantex Plant

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: Amendment by Board Member, Sean Sullivan to Yellow Folder Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting safety Bases at the Pantex Plant

DOC# 2015-63A Amendment by Board Member, Sean Sullivan to Yellow Folder Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting safety Bases at the Pantex Plant

All Office Directors have provided their inputs.

Approved _____
Disapproved _____
Abstain _____
Recusal – Not Participating _____

COMMENTS:

Below _____
Attached _____
None _____

Alicia Proctor
Executive Assistant
Office of the Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Ave, NW, STE 700
Washington, DC 20004