

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

**DNFSB WORK PLAN
FISCAL YEAR 2022**

September 2021

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Summary and Agency Cross-Cutting Work Plan Items

For Fiscal Year (FY) 2022, the Defense Nuclear Facilities Safety Board (DNFSB or Board) is creating an Agency-wide work plan that includes sections for each of its offices; the Office of the Executive Director of Operations (OEDO), the Office of the General Manager (OGM), the Office of the Technical Director (OTD), and the Office of the General Counsel (OGC). Additionally, this work plan includes the cross-cutting work plan items listed below, which, like many of the individual office items, will require an integrated approach across all four offices. This integrated approach will foster greater collaboration on items that are intended to raise the overall performance of the Agency.

Cross-Cutting Work Plan Items for FY 2022

| Item | Description |
|--|--|
| Agency Culture | Embed Agency core values and diversity, equity, inclusion, and accessibility principles more deeply into the organizational culture, work practices, and performance plans. |
| Strategic Plan Development | Work with the Board to develop the next Agency strategic plan. |
| Administrative Integration | Enhance administrative integration across the Agency through the full implementation of staffing, performance, and training systems. |
| Directives and Supplementary Documents | Make substantial progress in updating Agency directives and supplementary documents so that they reflect the Agency's organizational construct and meet periodic review requirements. Implement updates to the Agency's telework directive. |
| Human Capital Plan | Finalize the development of the DNFSB Human Capital Plan and begin implementation. |
| Employee Development | Extend the use of individual/executive development plans (IDP/EDP) Agency-wide and develop a corresponding training and development focus within the Agency to build, sustain, and retain DNFSB capabilities. |
| New Employee Onboarding | Review and make updates to new employee orientation and associated administrative processes. |
| DNFSB Website Accessibility | Ensure the contents of the Agency's website meet accessibility standards for people with disabilities. |
| Pandemic Response | Address COVID-19 pandemic impacts and related efforts, such as implementing government-wide guidance (e.g., vaccination requirements), addressing return to work considerations (e.g., workspace reconfigurations), and retaining employees. |

Office of the Executive Director of Operations

The Office of the Executive Director of Operations was established in FY 2021 to provide direct support to the Board; manage internal communications, external affairs, and the directives program; and lead the Equal Employment Opportunity (EEO) program. Fiscal Year 2022 is the first year that OEDO will have its own portion of the Agency’s work plan. Key areas of emphasis include building front office capabilities, expanding communications, improving Agency internal controls, and enhancing the Agency’s EEO efforts.

OEDO Work Plan Items for FY 2022

| <u>Item</u> | <u>Description</u> |
|---|---|
| <u>Strategy</u> | |
| Nuclear Safety Strategic Foresight | Analyze Department of Energy and National Nuclear Security Administration trends to increase the Agency’s awareness of emerging nuclear safety items of interest. |
| Nuclear Safety Strategic Communications | Develop and execute enhanced strategic communications around principal safety reviews or other areas of significant Board interest (e.g., aging infrastructure). |
| <u>Board Operations</u> | |
| Read Ahead Process | Create and implement a read ahead process to prepare Board Members and other senior Agency leaders for engagements with external parties. |
| First 30 Years Report | Request Congressional Research Service to update the 20 Year Report to reflect the following 10 years of DNFSB’s history. |
| Board Policy Statements | Work with the Board Members to coordinate updates to Board Policy Statements. |
| Board Front Office Procedures | Support any Board-driven updates to Agency front office procedures. |
| Delegations of Authority | Review Agency delegations of authority and recommend necessary updates. |
| External Communications | Increase the frequency of communications with Congress and the Interagency about the Board’s work and implement meetings between the Executive Director of Operations and other Agency senior executive counterparts. |
| Internal Controls Updates | Complete updates to the Agency’s Internal Controls directive and operating procedure. |

| <u>Equal Employment Opportunity</u> | |
|---|---|
| EEO Updates | Finalize updates to the Agency's EEO directive and operating procedure. |
| Advance Diversity, Equity, Inclusion, and Accessibility Efforts | Complete the development of an implementation plan for the Diversity, Equity, and Inclusion Strategic Plan. |
| Recommended EEO Training | Carry out recommended training sessions on topics that enhance the Agency's EEO efforts. |

Office of the General Manager

The Office of the General Manager is responsible for the major administrative functions of the Agency. It includes the Divisions of Human Resources, Budget and Finance, Information Technology, and Operational Services. These functions are fundamentally support functions for the operation of the Agency and involve a high degree of customer service. OGM continues to make improvements to its processes across all its functions. In addition to its non-discretionary baseload work, OGM-specific work plan items will be prioritized to create or update procedures and instructions to formalize improved processes. A strong emphasis will continue for updating information technology systems including cybersecurity enhancements, and on establishing a human capital plan to improve recruiting, development, and retention of employees.

OGM Work Plan Items for FY 2022

| Item | Description |
|---|--|
| <u>Strategic Cross-Cutting Items</u> | |
| Open OIG Audit Recommendation Closeouts | OGM has initiated a concerted effort to close out open OIG audit recommendations, particularly on recurring items. This effort will continue through FY 2022 with a goal to close out all open recommendations within 18 months. There are over 20 open recommendations dating as far back as 2017. |
| Agency Records Management System Design and Selection | DNFSB uses a combination of paper files, website, network drives, and SharePoint to maintain Agency records. This mixture inhibits compliance with FOIA searches, knowledge transfer, and NARA records processing. OGM will take the initial steps in identifying and selecting an Agency records management system. |
| GovTA | Led by DHR and supported by DIT and DBF, the Agency will transition to a new timekeeping system due to the retirement of the current system. The new system incorporates a module for establishing and tracking telework agreements. |
| Classified Network | OGM will assess the costs/benefits of installing a classified network. If approved by the Board, OGM will source installation of the network in the limited area, establish procedures for the use and maintenance of the network, and commence installation. |

| | |
|--|--|
| <u>Division of Human Resources (DHR)</u> | |
| Development and Training | DHR will update the AgLearn system with the profile of each employee. Standard training courses will be entered into the system to allow tracking of each employee’s training records. |
| Supervisor and Executive Development | DHR will work to implement a curriculum for the training of new supervisors. DHR will identify opportunities for executive development for SES employees who entered the SES within the past two years. |
| <u>Division of Information Technology (DIT)</u> | |
| PIV Native / ADFS (Active Directory Federated Services) | To ensure compliance with the Federal Information Security Modernization Act requirements in cloud-based systems, DIT will pursue a solution to allow multifactor authentication between networked assets and cloud systems. While the Agency’s primary software vendor does not yet support PIV authentication to the cloud, and ADFS would require substantial additional asset procurement, DIT will identify and implement a right-sized solution for DNFSB. |
| MS365 Phase II | DIT will complete phase II elements of enabling functionality of the MS suite of collaboration tools. |
| IPv6 Internet Protocol Upgrade | Driven by a Presidential mandate, DIT will continue identifying systems and components of the IT system that must be upgraded to the newer internet protocol. This extensive effort requires coordination with many service providers and impacts all network capable devices. The effort will continue into FY 2024 for completion. |
| Cyber Security Monitoring | DIT will complete revisions to the cybersecurity monitoring to align with Computer Information Security Agency requirements. The monitoring will apply to both the general service system and to cloud based systems, provide tracked incidents, and harden the DNFSB system against cyber attacks. |

| <u>Division of Budget and Finance (DBF)</u> | |
|--|---|
| Enterprise Resource Planning (ERP) System | DNFSB is currently operating in a manual and distributed environment where budgeting and financial operations are accomplished on Excel spreadsheets, and with legacy systems that do not interface with each other. DBF will identify and select an ERP System to manage day-to-day DNFSB business activities such as budgeting, accounting, procurement, project management, and risk management and compliance, among other functions. |
| <u>Division of Operational Services (DOS)</u> | |
| Space Reconfiguration | DOS will configure office space to support increased telework and remote work employees. Offices with broken or worn furniture will be updated with replacement furniture available through GSA. |
| Cyclical Carpet and Wall Covering Refresh | Pursuant to GSA direction, OGM will execute the cyclical refresh that replaces carpeting and wall coverings within the DNFSB space. |
| Contracting Operating Procedure and Deskbook | DOS will create an operating procedure to ensure that the Agency contracting process meets regulatory requirements and minimizes risk of waste, fraud, abuse, and mismanagement. |
| Personnel Security Processing Improvements | Transition Tier 1, 2, and 4 personnel security reviews to DOS to eliminate delays in processing employee actions. |
| FOIA Regulation Update | Amend the Agency FOIA regulations to update the fee schedule for FOIA processing. |
| System of Records Notice | Update and publish a Federal Register notice in compliance with the Privacy Act for the Agency systems of records. |

Office of the Technical Director

The Office of the Technical Director¹ developed its portion of the Agency's FY 2022 work plan based on the Defense Nuclear Facilities Safety Board's strategic plan and defense nuclear facilities safety oversight mission. The plan discusses the safety oversight approach and planning process.

Approach. As in previous years, OTD's portion of the FY 2022 work plan is based on activities related to Strategic Objective 1.1 – completing timely, high-quality safety reviews that identify and analyze safety issues and best practices, and search for similar challenges complex-wide. To accomplish this, OTD management identified safety oversight plan owners to develop safety oversight plans and propose review activities, with input from subject matter experts and other interested technical staff. OTD management reviewed and approved the safety oversight plan strategies and reviewed the proposed safety review activities.

In FY 2022, management selected a smaller number of the safety reviews from the total number of proposed safety reviews with the intention to focus on completing a higher percentage of those safety reviews. This change was implemented to address feedback and questions from the Board, technical staff and management, and the Inspector General. To accomplish this, OTD management limited the total number of safety reviews for FY 2022 to a total of 91. OTD management selected these 91 safety reviews based on priority and resource constraints and ensured each safety oversight plan area included appropriate coverage.

All technical staff were then given the opportunity to volunteer as safety review leads and/or safety review team members for any new safety review activities that would be starting in the first quarter of FY 2022. These safety reviews are designated as "Active." OTD management finalized safety review team leads and members for the "Active" safety reviews based on this staff input. Safety reviews that are not occurring in the first quarter are currently designated as "On-Deck." As the year progresses, "On-Deck" safety reviews will be transitioned to "Active" safety reviews based on whether they will start in the current rolling quarter, which includes achieving high confidence on the schedule of precursor DOE activities or products. Additional sign-up periods will occur throughout FY 2022 to determine safety review leads and teams for safety reviews that have transitioned to "Active." This adjustment is to allow for more flexible staff safety reviews throughout the year. The total number of "Active," "On-Deck," and any completed safety reviews will remain approximately 91 throughout the year.

Uncertainties. Uncertainties associated with OTD's portion of the work plan are largely tied to Department of Energy (DOE) schedule changes, emerging work activities, and the potential for technical staff reassignment and attrition. Historically, DOE schedule changes tend to result in delays, which may delay OTD's safety oversight activities throughout the year. Board direction and emergent DOE activities also drive the need to adjust the work plan. OTD management will manage these uncertainties by adjusting schedules for safety reviews in the work plan and

¹ Acronyms for OTD's portion of the work plan are defined in Appendix A.

incorporating new safety reviews when necessary, while keeping the total number of safety reviews at approximately 91.

Additionally, due to potential uncertainties in travel and site personnel availability because of the ongoing pandemic, OTD management encouraged safety oversight plan owners to consider various methods to complete the interaction phase with DOE and contractor personnel when scoping proposed safety reviews.

During FY 2022, OTD management will adjust schedules and work activities as needed to reflect the Board's priorities and maintain the quality of each safety review.

Principal Safety Reviews. For FY 2022, OTD staff identified a set of potential principal safety reviews. For FY 2022, principal safety reviews are defined as safety reviews of major strategic importance to nuclear safety. The potential principal safety reviews are distributed across the four technical groups (excluding Field Operations) and include scope in operating facilities, design and construction projects, and complex-wide programs. Of the potential principal safety reviews, one is a carryover safety review from FY 2021. During the fiscal year, OTD management will further down-select from the list of remaining potential principal safety reviews to a final list, depending on DOE progress and travel restrictions. OTD management will prioritize these safety reviews for completion and will provide additional management support and oversight as needed. The list of potential principal safety reviews is provided below in Table 1 in the results section.

Non-Review Activities. Engineering performance activities in FY 2022 will focus on improving OTD management controls, updating procedures, and implementing staff training to achieve the Board's mission efficiently and effectively. OTD will continue to support pandemic response, interagency initiatives, briefings to outside groups and Congress, and internal training requirements. In addition, OTD will continue advertising, interviewing, and hiring engineering candidates. OTD has used advertisements in *Diversity in Action* magazine, referrals, announcements on USAJOBS, and attendance at career fairs to ensure the Agency can reach as many qualified candidates as possible. Other non-review activities include support of potential Board travel, site "deep dive" briefings to the Board and staff, and public meetings and hearings. For FY 2022, these activities will be managed outside of the work plan; however, staff and leadership will manage how much time is generally spent on these activities. Emergent non-review activities may impact schedules and scope of safety review activities throughout the year. As in previous years, non-review activities will be performed by employees across OTD.

As part of these non-review activities, OTD plans to update the following instructions, operating procedures, work practices and standing orders related to OTD activities:

1. Work Planning
 - a. I-514.1, *Technical Staff Internal Work Prioritization and Reporting Decision Criteria*
 - b. OP-521.2-1, *Developing Technical Staff Oversight Plans and Work Plans*
2. Work Execution
 - a. I-530.1, *Execution of Technical Staff Reviews*
 - b. OP-530.1, *Planning and Executing Technical Staff Reviews*
 - c. Revise or cancel related Technical Director's Standing Orders (e.g., TDSO 18-04)

3. Cognizant Engineer instructions
 - a. I-520.1, *Cognizant Engineer Program*
 - b. WP-520.1, *Expectations and Guidance for Site Cognizant Engineers*
 - c. WP-520.1-0C, *Expectations and Guidance for Design and Construction Project Cognizant Engineers*
4. Records Management
 - a. I-562.1, *Technical Staff Records Management and Information Retention*
 - b. OP-562.1-1, *Storing and Maintaining Technical Staff Documents and Information*
5. Training and Conferences
 - a. OP-570.1-1, *Training Request and Approval* (as needed to accommodate issuance of OP-570.1-2 and cancellation of TDSO 15-02, or non-issuance of OP-570.1-2 and continued use of the TDSO)
 - b. OP-570.1-2, *Disclaimers and DNFSB Affiliation* (revision in progress since 2019)
 - c. TDSO 15-02, *Disclaimers in External Technical Staff Communications and Presentations* (cancel if OP-570.1-2 is issued)
6. Obtaining Information from DOE
 - a. OP-530.1-2, *Obtaining Information from DOE* (as needed to align with final MOU with DOE)
7. Recommendations
 - a. OP-542.1-6, *Developing Board Recommendations* (revision in progress since 2020)

Results. OTD’s portion of the FY 2022 work plan includes 91 total safety reviews; 38 new safety reviews and 53 FY 2021 carryover safety reviews.²

Figure 1 provides the distribution of safety reviews among the OTD groups, and Figure 2 shows a breakdown by site. Table 1 provides the complete list of potential principal safety reviews. The four subsequent sections provide the planned safety reviews for each OTD group (there are no planned safety reviews for Field Operations), organized by site and/or oversight plan area.

² Carryover reviews are safety reviews that were started in FY 2021 for which some level of effort will continue into FY 2022.

Figure 1. *Distribution of Reviews in the OTD portion of the Work Plan by Technical Group*

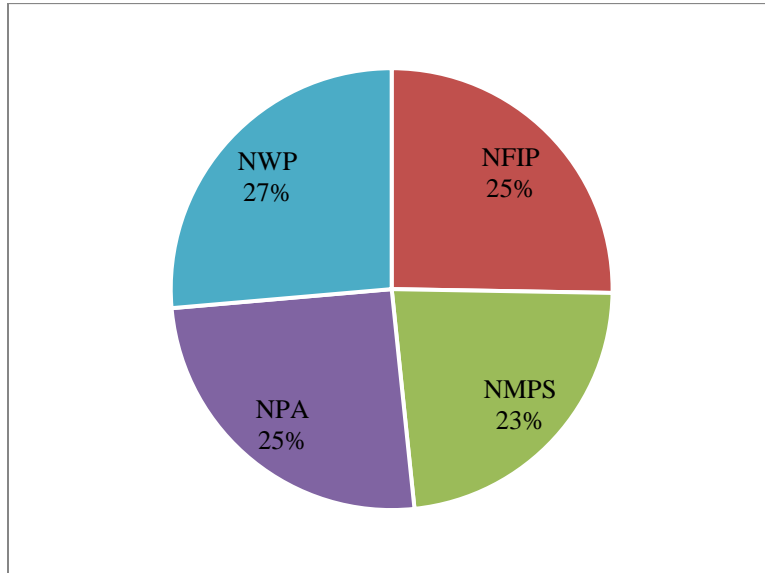
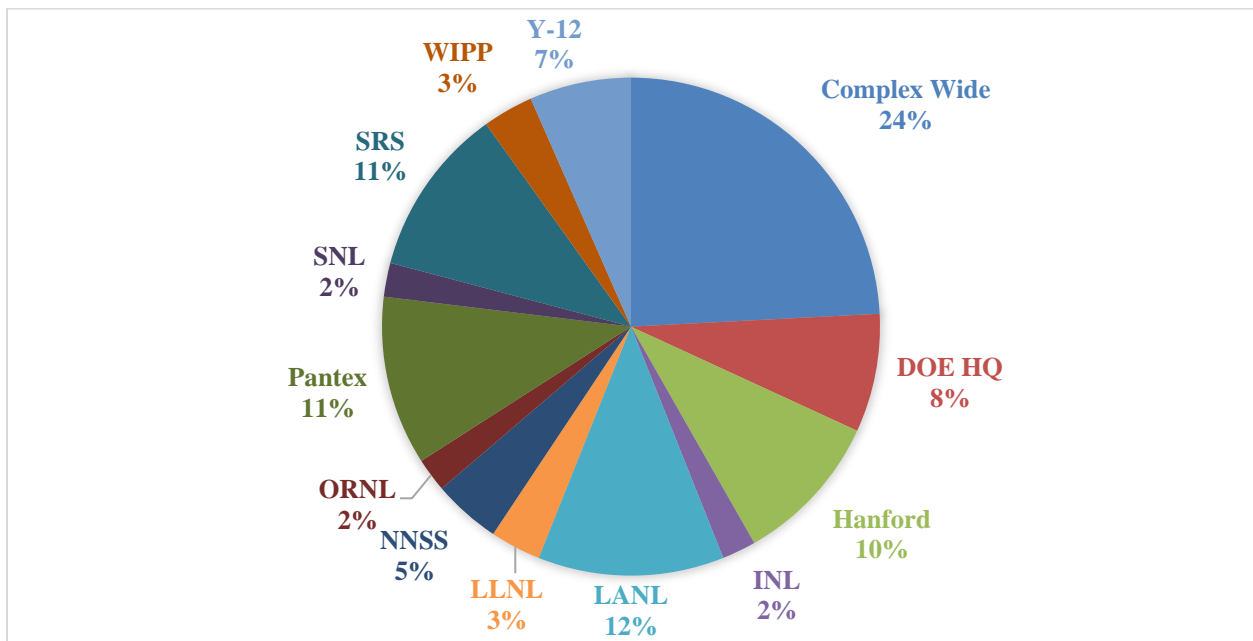


Figure 2. *Distribution of Reviews in the OTD portion of the Work Plan by Site³*



³ DOE HQ reviews are reviews that include interactions primarily with DOE HQ staff. The majority are DOE Directives reviews.

Complex-wide reviews are reviews which include interactions at multiple DOE sites and/or focus on implementation of a particular area across the complex (e.g., Management of Aging Infrastructure).

Table 1. Potential Principal Safety Reviews

| Group | Review Title | Site | FY21 Carryover |
|-------|--|--------------|----------------|
| NPA | Maintenance and Reliability of Safety-Related SSCs | Complex-wide | no |
| NWP | PF-4 DOE Standard 3009-2014 Safety Basis | LANL | no |
| NFIP | Management of Aging Infrastructure | Complex-wide | yes |
| NFIP | Requirements and Guidance for Construction Inspections, Tests, and Acceptance Criteria | Complex-wide | no |
| NMPS | WTP Safety Management Programs | Hanford | yes |

Nuclear Weapon Programs (NWP). OTD’s NWP group performs independent and timely oversight of the safety of operations involving maintenance of the nuclear weapons stockpile and of weapons-related research, development, and testing. In FY 2022, NWP will conduct effective safety oversight through formal, well-planned reviews at NNSA defense nuclear facilities. Table 2 identifies all NWP safety reviews turned on in the work plan (potential principal safety review shown in bold).

Table 2. NWP Safety Reviews

| Site | Title | FY21 Carryover |
|-------------|--|----------------|
| LANL | PF-4 DOE-STD-3009-2014 Safety Basis | no |
| LANL | Conduct of Operations and Training | no |
| LANL | Deactivation and Decommissioning Work Planning and Control | no |
| LANL | PF-4 Leak Path Factor Upgrade Supporting Calculations | yes |
| LANL | Updated Sitewide Atmospheric Dispersion Analysis | yes |
| LANL | Glovebox Glove Integrity Program | yes |
| LANL | Onsite Transportation Safety | yes |
| LLNL | SQA of CAMs for Recovery Glovebox Line Startup | no |
| LLNL | LLNL Recovery Glovebox Line - Building 332 DSA/TSR Review | yes |
| NNSS | DAF & NCERC Safety Basis Review | yes |
| NNSS | LANL NCERC Operations Criticality Safety Program Review | yes |
| Pantex | Evaluation of Recommendation 2019-1 Implementation Plan Deliverables | yes |
| Pantex | Evaluation of Pantex Planned Improvements | yes |
| Pantex | Electrical Tester Equipment Review | no |
| Pantex | NES Evaluation Oversight - NESSs, OSRs, NESMSs, and NCEs | no |
| Pantex | Fire Protection Program Review | yes |
| Pantex | W87 and W78 Operational Safety Reviews | yes |
| Pantex | Welding Program Review | yes |

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| SNL | Review of EP&R at SNL | yes |
| SNL | Conduct of Operations Review at Annular Core Research Reactor | yes |
| SRS | SRS Tritium Safety Management Programs | yes |
| SRS | SRS' Corrective Actions on Sub-Recommendation 3 of Recommendation 2019-2 | yes |
| SRS | SRS Tritium Facilities Electrical Systems Review | yes |
| Y-12 | Y-12 Fire Protection Programmatic Review | yes |

Nuclear Materials Processing and Stabilization (NMPS). The NMPS group performs independent and timely oversight ensuring that the health and safety of the public are adequately protected as DOE disposes of excess radioactive materials, cleans up surplus defense nuclear facilities, and begins operation of new facilities.

NMPS will conduct effective safety oversight through formal, well-planned safety reviews at DOE-EM defense nuclear facilities. Table 3 identifies NMPS safety reviews turned on in the work plan (potential principal safety review shown in bold).

Table 3. NMPS Safety Reviews

| Site | Title | FY21 Carryover |
|----------------|---|----------------|
| Complex Wide | National Transuranic Waste Program Certified Program Oversight | yes |
| Hanford | Building 324 Remediation (Radiological Control – Conduct of Operations) | no |
| Hanford | 105KW Post-Sludge Basin Clean-Up Activities (Conduct of Operations) | no |
| Hanford | Solid Waste Operations Complex DSA Review | no |
| Hanford | LAW Readiness Review | no |
| Hanford | WTP Safety Management Programs | yes |
| Hanford | Tank and Pipeline Integrity (TAPI) | yes |
| Hanford | WTP-DFLAW Integration of Safety Bases Review | yes |
| INL | ARP/AMWTP TRU Waste Characterization, Storage, and Handling Operations | yes |
| INL | IWTU DOE Readiness Assessment Prior to Confirmatory Run | yes |
| LANL | Area G DOE-STD-3009-2014 Safety Basis | no |
| LANL | Area G Safety Basis | yes |
| ORNL | Solid Waste Storage Area 5 PDSA Review | yes |
| ORNL | Building 2026 Readiness Activities Review | yes |
| SRS | SRS Dispersion Analysis Data | no |
| SRS | SRS H Tank Farms DSA Rev. 21/22 | no |
| SRS | SWPF Sustained Operations | yes |
| SRS | SRNL Safety Basis Implementation | yes |

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|------|---|-----|
| WIPP | Waste Control Specialists Waste Disposition | yes |
| WIPP | 700C Fan Startup Review | yes |
| WIPP | WIPP UG Air Flow Direction | yes |

Nuclear Programs and Analysis (NPA). The NPA group performs independent and timely safety oversight of the development, implementation, and maintenance of DOE regulations, requirements, and guidance for providing adequate protection of public health and safety at defense nuclear facilities, and the establishment and implementation of safety programs at defense nuclear facilities.

NPA is responsible for complex-wide programmatic safety review efforts addressing topics such as nuclear criticality safety, DOE safety oversight, and emergency management. NPA also leads OTD safety review of DOE directives. Table 4 identifies the NPA safety reviews turned on in the work plan (potential principal safety review shown in bold).

Table 4. NPA Reviews

| Oversight Plan | Title | FY21 Carryover |
|----------------|---|----------------|
| DOE Directives | DOE-STD-1129, Tritium Handling and Safe Storage | no |
| DOE Directives | DOE/EH-0545, Seismic Eval for Equipment | no |
| DOE Directives | DOE Order 435.1, Radioactive Waste Management | no |
| DOE Directives | Directives in DOE Site Contracts | yes |
| DOE Directives | DOE-HDBK-1224, Hazard and Accident Analysis | yes |
| DOE Directives | DOE Order 425.1D, Readiness to Startup or Restart | yes |
| DOE Directives | DOE-STD-1066, Fire Protection | yes |
| DOE Directives | DOE-HDBK-3010, Airborne Release Fractions | yes |
| DOE Oversight | Issue Identification | no |
| DOE Oversight | Assessment of DOE Oversight Effectiveness | yes |
| DOE Oversight | Quality of Field Office Review and Approval of DSAs | yes |
| DOE Oversight | Review of DOE's Safety Software Registry | yes |
| Nuclear Safety | Recommendation 2020-1 Follow-Up Activities | no |
| Nuclear Safety | Safety of TRU Waste Storage and Processing | no |
| Nuclear Safety | Reactive Nuclear Materials | yes |
| SMPs | Emergency Exercise Observations | no |
| SMPs | Maintenance and Reliability of Safety-Related SSCs | no |
| SMPs | Criticality Safety Metrics Evaluation for FY22 | no |
| SMPs | Chemical Safety | no |
| SMPs | Pantex Dosimetry | yes |
| SMPs | Complex-wide Criticality Safety Evaluation | yes |
| SMPs | DOE Corporate Operating Experience Program Implementation | yes |
| SMPs | Y-12 Dosimetry | no |

Nuclear Facilities Infrastructure and Projects (NFIP). NFIP is responsible for reviewing and evaluating the technical adequacy of complex processes and safety-related systems related to the infrastructure and projects within the DOE’s defense nuclear facility complex. This includes research and development supporting the design of new defense nuclear facilities, design of new or modification of existing component production facilities, and the design of defense nuclear facilities to safely store or treat nuclear wastes resulting from the production of nuclear weapons.

Table 5 identifies the NFIP safety reviews turned on in the work plan (potential principal safety review shown in bold).

Table 5. NFIP Safety Reviews

| Site | Title | FY21 Carryover |
|---------------------|---|----------------|
| Complex Wide | Management of Aging Infrastructure | yes |
| Complex Wide | Technical Safety Requirements Development for New Facilities | no |
| Complex Wide | Oversight Themes from NNSA Project Reviews of Conceptual Designs | no |
| Complex Wide | Requirements and Guidance for Construction Inspections, Tests and Acceptance Criteria | no |
| Complex Wide | Qualification of Batteries Used in Safety Systems | yes |
| Complex Wide | Maintenance of Underground Cabling | yes |
| Complex Wide | Assessment of BUILDER Infrastructure Scores for NNSA Facilities | no |
| Hanford | Waste Encapsulation and Storage Facility Dry Capsule Storage and Facility Modifications | no |
| Hanford | Waste Treatment Plant-High Level Waste Facility Preliminary Design Review | yes |
| LANL | Plutonium Facility Interim Seismic Risk Evaluation | no |
| LANL | Los Alamos Glovebox Design, Testing, and Installation | no |
| LLNL | LLNL Building 332 Seismic Safety Review | yes |
| NNSS | Enhanced Capabilities for Subcritical Experiments Preliminary Documented Safety Analysis | no |
| NNSS | Enhanced Capabilities for Subcritical Experiments Safety Design Strategy Review and Scoping Visit | yes |
| Pantex | Pantex Final Probabilistic Seismic Hazards Analysis Update | no |
| Pantex | 12-44 False Ceiling Replacement | no |

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|------|---|-----|
| SRS | SRS Probabilistic Seismic Hazards Analysis Update | no |
| SRS | SRS Tritium Stack Analysis | yes |
| SRS | Savannah River Plutonium Processing Facility (SRPPF) CD-1 Review | yes |
| Y-12 | Structural Review of Y-12 Facilities with Enduring Missions | no |
| Y-12 | Uranium Processing Facility Equipment Procurement and Installation Review | no |
| Y-12 | Uranium Processing Facility Criticality Safety Evaluation Review | no |
| Y-12 | Uranium Processing Facility Factory Acceptance Testing | yes |

Office of the General Counsel

The Office of the General Counsel (OGC) provides direct legal support to the Board in its safety oversight of defense nuclear facilities. OGC also supports the Executive Director of Operations, the Technical Director, the General Manager, and their staff in the execution of Agency functions. OGC is the repository of legal resources for the Agency and manages the Agency’s compliance with all legal requirements, including by serving as the lead on several important cross-cutting Agency functions (e.g., ethics and alternative dispute resolution).

The majority of the work OGC performs is non-discretionary – i.e., it is required by law or necessary for Agency operation. This includes Board-directed work, and work to support other Agency components (e.g., ethics, contract reviews, jurisdictional analysis, Sunshine Act compliance, and employment law). For such work, OGC works regularly to understand the needs and priorities of the Agency and adjust its allocation of resources appropriately. This plan does not specifically identify the non-discretionary OGC work planned for Fiscal Year 2022. Rather, this plan provides a list of discretionary work that OGC will spearhead to achieve organizational improvement – e.g., business process enhancements and office practices not required by law or regulation and not driven by Board direction.

OGC Work Plan Items for FY 2022

| Item | Description |
|--|--|
| Safety Allegations | Develop and implement a comprehensive Safety Allegations Program. This will include a directive and operating procedure articulating how DNFSB will process such allegations, as well as an outward-facing resource (webpage and/or guidance document) informing the public how to report a safety allegation. Once these documents are in place, OGC will conduct appropriate training for Board Members and staff. |
| Ethics | Develop procedures governing the Agency’s ethics program. This includes procedures covering ethics training and requisite notices to new employees and supervisors. |
| Testimony and Document Production by Board Employees | Modify the Board’s regulations at 10 C.F.R. § 1707 to apply only to cases in which the United States is not a party, in conformance with <i>Touhy v. Ragen</i> , 340 U.S. 462 (1951). Develop procedures governing testimony and production of official documents by Board employees in all cases, regardless of whether the United States is a party. |

Appendix A. Acronyms for OTD's Portion of the Agency Work Plan

| Acronym | Full Name |
|---------|---|
| AMWTP | Advanced Mixed Waste Treatment Project (INL) |
| ARP | Accelerated Retrieval Project (INL) |
| CAM | Continuous Air Monitor |
| DAF | Device Assembly Facility (NNSS) |
| DFLAW | Direct Feed LAW (Hanford) |
| DOE | Department of Energy |
| DOE-EM | DOE Office of Environmental Management |
| DOE HQ | DOE Headquarters |
| DSA | Documented Safety Analysis |
| EP | Engineering Performance |
| EP&R | Emergency Preparedness and Response |
| FY | Fiscal Year |
| HDBK | Handbook |
| INL | Idaho National Laboratory |
| IWTU | Integrated Waste Treatment Unit (INL) |
| LANL | Los Alamos National Laboratory |
| LAW | Low Activity Waste |
| LLNL | Lawrence Livermore National Laboratory |
| NCE | Nuclear Explosive Safety Change Evaluation |
| NCERC | National Criticality Experiments Research Center (NNSS) |
| ND | Non-discretionary |
| NESS | Nuclear Explosive Safety Study |
| NFIP | Nuclear Facilities Infrastructure and Projects |
| NMPS | Nuclear Materials Processing and Stabilization |
| NNSA | National Nuclear Security Administration |
| NNSS | Nevada National Security Site |
| NESMS | Nuclear Explosive Safety Master Study |
| NPA | Nuclear Programs and Analysis |
| NWP | Nuclear Weapon Programs |
| ORNL | Oak Ridge National Laboratory |
| OSR | Operational Safety Review |
| OTD | Office of the Technical Director |
| Pantex | Pantex Plant |
| PDSA | Preliminary Documented Safety Analysis |
| PF-4 | Plutonium Facility (LANL) |
| SMP | Safety Management Program |

| Acronym | Full Name |
|----------------|--|
| SNL | Sandia National Laboratories |
| SRNL | Savannah River National Laboratory |
| SRS | Savannah River Site |
| SQA | Software Quality Assurance |
| SSC | Structures, Systems, and Components |
| STD | Standard |
| SWPF | Salt Waste Processing Facility (SRS) |
| TAPI | Tank and Pipeline Integrity |
| TRU | Transuranic |
| TSR | Technical Safety Requirement |
| WIPP | Waste Isolation Pilot Plant |
| WTP | Waste Treatment & Immobilization Plant (Hanford) |
| Y-12 | Y-12 National Security Complex |

AFFIRMATION OF BOARD VOTING RECORD

SUBJECT: FY 2022 DNFSB Work Plan

Doc Control#: 2021-300-0026

The Board acted on the above document on 09/29/2021. The document was Approved.

The votes were recorded as:

| | APRVD | DISAPRVD | ABSTAIN | NOT PARTICIPATING | COMMENT | DATE |
|--------------------|-------|--------------------------|--------------------------|--------------------------|--------------------------|------------|
| Joyce L. Connery | ✓ | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 09/29/2021 |
| Thomas Summers | ✓ | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 09/29/2021 |
| Jessie H. Roberson | ✓ | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 09/29/2021 |

This Record contains a summary of voting on this matter together with the individual vote sheets, views and comments of the Board Members.

Shelby Qualls

Executive Secretary to the Board

Attachments:

1. Voting Summary
2. Board Member Vote Sheets

DEFENSE NUCLEAR FACILITIES SAFETY BOARD
NOTATIONAL VOTE RESPONSE SHEET

FROM: Joyce L. Connery

SUBJECT: FY 2022 DNFSB Work Plan

Doc Control#: 2021-300-0026

DATE: 09/29/2021

VOTE: Approved

COMMENTS:

None

Joyce L. Connery

DEFENSE NUCLEAR FACILITIES SAFETY BOARD
NOTATIONAL VOTE RESPONSE SHEET

FROM: Thomas Summers

SUBJECT: FY 2022 DNFSB Work Plan

Doc Control#: 2021-300-0026

DATE: 09/29/2021

VOTE: Approved

COMMENTS:

None

Thomas Summers

DEFENSE NUCLEAR FACILITIES SAFETY BOARD
NOTATIONAL VOTE RESPONSE SHEET

FROM: Jessie H. Roberson

SUBJECT: FY 2022 DNFSB Work Plan

Doc Control#: 2021-300-0026

DATE: 09/29/2021

VOTE: Approved

Member voted by email.

COMMENTS:

None

Jessie H. Roberson