

Doc#2016-019A

Amendment by Board Member Bruce Hamilton to YELLOW FOLDER Doc#2016-019, Tritium Extraction Facility Safety Basis Review

Amendment: Delete the last sentence in the cover letter, which states: "Pursuant to 42 U.S.C. § 2286b(d), we request an update in 6 months on the status of and schedule for completing the Tritium Extraction Facility safety basis update, and what measures are in place to ensure safe operations until the planned updates are completed."

Justification: The Board's statutory authority in 42 U.S.C. § 2286b(d) to establish reporting requirements for the Secretary of Energy should rarely be used when the underlying issues do not clearly rise to the level of adequate protection of the public health and safety. Using the Board's authority in that manner adds quantifiable bureaucratic burden to the already resource-challenged Department of Energy in exchange for marginal or indeterminate gain in safety margin.

If the Board determines that an issue is of such significance that it should invoke the reporting requirements of its enabling statute, then those requirements should in most cases be accompanied by, or related to, a Recommendation clearly tied to the adequate protection of public health and safety. In this case, that threshold has not been reached.

AFFIRMATION OF BOARD VOTING RECORD

SUBJECT: Amendment by Board Member Bruce Hamilton to YELLOW FOLDER Doc#2016-019, Tritium Extraction Facility Safety Basis

Doc Control#2016-019A

The Board, with Board Member(s) Sean Sullivan, Bruce Hamilton *approving*, Board Member(s) Joyce L. Connery, Jessie H. Roberson *disapproving*, Board Member(s) Daniel J. Santos *abstaining*, and Board Member(s) none *recusing*, have voted to disapprove the above document on December 21, 2015.

The votes were recorded as:

	APRVD	DISAPRVD	ABSTAIN	NOT PARTICIPATING*	COMMENT	DATE
Joyce L. Connery	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	12/17/15
Jessie H. Roberson	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	12/21/15
Sean Sullivan	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	12/18/15
Daniel J. Santos	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	12/21/15
Bruce Hamilton	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	12/17/15

*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.


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: Joyce L. Connery

SUBJECT: Amendment by Board Member Bruce Hamilton to YELLOW FOLDER Doc#2016-019, Tritium Extraction Facility Safety Basis

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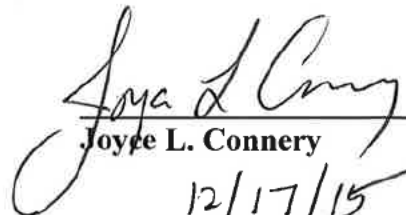
Approved _____ Disapproved X Abstain _____

Recusal – Not Participating _____

COMMENTS: Below Y Attached X None _____

I do not agree that the Board's statutory authority to establish reporting requirements should rarely be used when there is not a clear issue of adequate protection. The statute does not support that view, [REDACTED]

While I am sensitive to the notion of limiting unnecessary bureaucratic burdens and would support the judicious use of reporting requirements, to that end, I do not believe that this request is unduly burdensome.



Joyce L. Connery
12/17/15

Date

DEFENSE NUCLEAR FACILITIES SAFETY BOARD
NOTATIONAL VOTE RESPONSE SHEET

FROM: Jessie H. Roberson

SUBJECT: Amendment by Board Member Bruce Hamilton to YELLOW FOLDER
Doc#2016-019, Tritium Extraction Facility Safety Basis

Doc Control#2016-019A

Approved _____

Disapproved

Abstain _____

Recusal - Not Participating _____

COMMENTS:

Below

Attached _____

None _____

Although I may not agree with other parts of the proposed communication, I do believe in this specific case a reporting requirement is warranted. I do agree that today a recommendation may not be warranted but waiting until 2017 to identify potential controls for new information ~~from~~ today is too long. The reporting requirement ~~not~~ DOE/NNSA that the Board believes at least compensatory actions need to be taken until they update their annual safety basis.

Jessie H. Roberson
Jessie H. Roberson

December 21 2015
Date

DEFENSE NUCLEAR FACILITIES SAFETY BOARD
NOTATIONAL VOTE RESPONSE SHEET

FROM: Sean Sullivan

SUBJECT: Amendment by Board Member Bruce Hamilton to YELLOW FOLDER
Doc#2016-019, Tritium Extraction Facility Safety Basis

Doc Control#2016-019A

Approved X Disapproved Abstain

Recusal – Not Participating

COMMENTS: Below X Attached None

I agree with the justification provided by Board Member Hamilton, which says in relevant part, “The Board’s statutory authority in 42 U.S.C. § 2286b(d) to establish reporting requirements for the Secretary of Energy should rarely be used when the underlying issues do not clearly rise to the level of adequate protection of the public health and safety. Using the Board’s authority in that manner adds quantifiable bureaucratic burden to the already resource-challenged Department of Energy in exchange for marginal or indeterminate gain in safety margin.”

//s//
Sean Sullivan

12/18/2015
Date

Shelby Qualls

From: Sean Sullivan
Sent: Friday, December 18, 2015 11:31 AM
To: Shelby Qualls; Lotus Smith
Subject: RE: Re-Send: Notational Vote: Doc#2016-019A, Amendment by Board Member Bruce Hamilton to YELLOW FOLDER Doc#2016-019, Tritium Extraction Facility Safety Basis - BLUE FOLDER
Attachments: 2016-019A Sullivan ballot_Amendment by Hamilton to Tritium Extraction Facility Safety Basis.pdf

Approved with comment. See attached.

From: Shelby Qualls
Sent: Thursday, December 17, 2015 4:02 PM
To: Bruce Hamilton; Daniel J. Santos; Jessie Roberson; Joyce Connery; Sean Sullivan
Cc: Lotus Smith; Shelby Qualls; James Biggins
Subject: Re-Send: Notational Vote: Doc#2016-019A, Amendment by Board Member Bruce Hamilton to YELLOW FOLDER Doc#2016-019, Tritium Extraction Facility Safety Basis - BLUE FOLDER

Re-sent to include Office Director comments.

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 Bruce Hamilton to YELLOW FOLDER Doc#2016-019, Tritium Extraction Facility Safety Basis

DOC# 2016-019A

Office Directors have provided their input.

Approved _____
Disapproved _____
Abstain _____
Recusal – Not Participating _____

COMMENTS:
Below _____
Attached _____
None _____

Shelby Qualls
Assistant Executive Secretary

Shelby Qualls

From: Daniel J. Santos
Sent: Monday, December 21, 2015 9:47 AM
To: Lotus Smith; Shelby Qualls
Subject: RE: Re-Send: Notational Vote: Doc#2016-019A, Amendment by Board Member Bruce Hamilton to YELLOW FOLDER Doc#2016-019, Tritium Extraction Facility Safety Basis - BLUE FOLDER

Abstain with no comments.

From: Shelby Qualls
Sent: Thursday, December 17, 2015 4:02 PM
To: Bruce Hamilton; Daniel J. Santos; Jessie Roberson; Joyce Connery; Sean Sullivan
Cc: Lotus Smith; Shelby Qualls; James Biggins
Subject: Re-Send: Notational Vote: Doc#2016-019A, Amendment by Board Member Bruce Hamilton to YELLOW FOLDER Doc#2016-019, Tritium Extraction Facility Safety Basis - BLUE FOLDER

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**DEFENSE NUCLEAR FACILITIES SAFETY BOARD
NOTATIONAL VOTE RESPONSE SHEET**

FROM: Members of the Board
SUBJECT: Amendment by Board Member Bruce Hamilton to YELLOW FOLDER Doc#2016-019, Tritium Extraction Facility Safety Basis

DOC# 2016-019A

Office Directors have provided their input.

Approved_____
Disapproved_____
Abstain_____
Recusal – Not Participating_____

COMMENTS:

Below_____
Attached_____
None_____

Shelby Qualls
Assistant Executive Secretary

Shelby Qualls

From: Bruce Hamilton
Sent: Thursday, December 17, 2015 3:49 PM
To: Shelby Qualls; Lotus Smith
Subject: RE: Notational Vote: Doc#2016-019A, Amendment by Board Member Bruce Hamilton to YELLOW FOLDER Doc#2016-019, Tritium Extraction Facility Safety Basis - BLUE FOLDER

I approve.
I have no comments.

Bruce Hamilton
Global cell & text: [REDACTED]

From: [Shelby Qualls](#)
Sent: 12/17/2015 15:42
To: [Bruce Hamilton](#); [Daniel J. Santos](#); [Jessie Roberson](#); [Joyce Connery](#); [Sean Sullivan](#)
Cc: [Lotus Smith](#); [Shelby Qualls](#); [James Biggins](#)
Subject: Notational Vote: Doc#2016-019A, Amendment by Board Member Bruce Hamilton to YELLOW FOLDER Doc#2016-019, Tritium Extraction Facility Safety Basis - BLUE FOLDER

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**DEFENSE NUCLEAR FACILITIES SAFETY BOARD
NOTATIONAL VOTE RESPONSE SHEET**

FROM: Members of the Board
SUBJECT: Amendment by Board Member Bruce Hamilton to YELLOW FOLDER Doc#2016-019, Tritium Extraction Facility Safety Basis

DOC# 2016-019A

Office Directors have provided their input.

Approved _____
Disapproved _____
Abstain _____
Recusal – Not Participating _____

COMMENTS:

Below _____
Attached _____
None _____

Shelby Qualls
Assistant Executive Secretary