



Department of Energy
Under Secretary for Nuclear Security
Administrator, National Nuclear Security Administration
Washington, DC 20585



November 5, 2015

The Honorable Joyce L. Connery
Chairman
Defense Nuclear Facilities Safety Board
65 Indiana Avenue, NW, Suite 700
Washington, DC 20004

Dear Madam Chairman:

On behalf of the Secretary, thank you for the opportunity to review the Defense Nuclear Facilities Safety Board (DNFSB) Draft Recommendation 2015-1, *Emergency Preparedness and Response at the Pantex Plant*. The National Nuclear Security Administration (NNSA) has established specific performance goals for the Pantex Emergency Management Program, to include improvements in the three areas highlighted by the Draft Recommendation 2015-1. These goals are consistent with the mutually agreed-upon benefits of implementing the DNFSB Recommendation 2014-1.

The draft Recommendation's risk assessment states: "it is not possible to do a quantitative assessment of the risk of these [the Pantex Emergency Management Program] elements to provide adequate protection of the workers and the public." As a point of clarification, the Department of Energy (DOE) demonstrates adequate protection of workers, the public and the environment as an integral part of operating a nuclear facility like that situated at the Pantex Plant. To this end, the Department has put in place a system of requirements, standards, policies and guidance that, when effectively implemented, not only provide reasonable assurance of adequate protection, but takes a very conservative approach to ensure such protection. Functions such as emergency management provide that additional conservatism and margin of protection. We are confident that, even with deficiencies identified by the DNFSB, the Pantex Emergency Management Program can perform its role to ensure this protection. Accordingly, DOE recommends removing the phrase: "in order to provide an adequate protection to the public and the workers" in justifying the need for the draft recommendation.

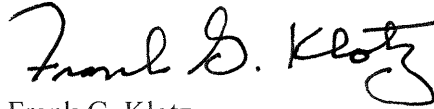
To increase protection assurances and drive improvement in an effective and efficient manner, I suggest that the best approach to address the concerns identified in your Draft Recommendation is to incorporate ongoing NNSA performance improvement initiatives and enhancements into the existing implementation plans for Recommendation 2014-1. This approach would enable the Department to take a holistic, integrated approach to making the needed improvements at Pantex.



We appreciate the DNFSB's perspective and look forward to continued positive interactions with you and your staff to include Pantex-specific actions and milestones in the existing Implementation Plan for Recommendation 2014-1.

If you have any questions, please contact me or Mr. Geoffrey Beausoleil, Manager, NNSA Production Office, at 865-576-0752.

Sincerely,

A handwritten signature in black ink that reads "Frank G. Klotz". The signature is written in a cursive style with a large, stylized "K" and "L".

Frank G. Klotz