

APPENDIX 4

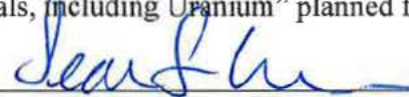
REQUEST FOR BOARD ACTION BY A BOARD MEMBER


Requester: Sullivan May 26, 2016

Brief description of Requested Action: The technical staff is directed to postpone for the remainder of FY16 any activity regarding toxicological consequences at the Uranium Processing Facility which involve Department of Energy employees or contractors. The delay will permit the Board to determine through the annual work plan process an appropriate staff priority to place on issues related to toxicological consequences at the UPF. This delay should be in addition to (and not in lieu of) any other delay the Board might approve.

Attachments (init) none (included clean version of any proposed document or modified document)

Summarize any time sensitive considerations: The staff has a review titled "UPF Consequence Analysis for Toxicological Materials, including Uranium" planned for June 13, 2016. I am seeking to delay this review.

Requestor signature  May 26, 2016

Executive secretary  May 26, 2016

	APRVD	DISAPRVD	ABSTAIN	NOT PARTICPATING	COMMENT	DATE
Joyce L. Connery	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Jessie H. Roberson	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Sean Sullivan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Daniel J. Santos	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____
Bruce Hamilton	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	_____

Final Disposition Summary

Executive Secretary signature _____ Click here to enter a date.

AFFIRMATION OF BOARD VOTING RECORD

SUBJECT: Request for Board Action by Board Member Sean Sullivan to Direct OTD to Postpone FY16 Activity re Toxicological Consequences at UPF

Doc Control#2016-300-009

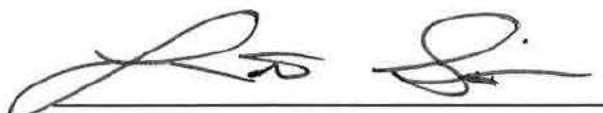
The Board, with Board Member(s), Sean Sullivan, Bruce Hamilton *approving*, Board Member(s) Joyce L. Connery, Jessie H. Roberson, Daniel J. Santos *disapproving*, Board Member(s) none *abstaining*, and Board Member(s) none *not participating*, have voted to disapprove on June 1, 2016.

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"/>	06/01/16
Jessie H. Roberson	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	06/01/16
Sean Sullivan	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	06/01/16
Daniel J. Santos	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	06/01/16
Bruce Hamilton	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	06/01/16

*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.



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

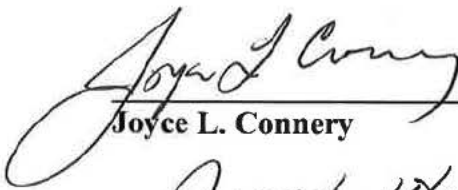
SUBJECT: Request for Board Action by Board Member Sean Sullivan to Direct OTD to Postpone FY16 Activity re Toxicological Consequences at UPF

Doc Control#2016-300-009

Approved _____ Disapproved Abstain _____
Recusal - Not Participating _____

COMMENTS: Below Attached _____ None _____

Consistent with my views on # 2016-300-009, I believe that the Board has, on several occasions, deemed that uranium toxicological consequences are in the purview of the Board. I would like to see the results of this review before making any conclusions with regard to this issue at UPF.



Joyce L. Connery
Date June 1, 2016

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

NOTATIONAL VOTE RESPONSE SHEET

FROM: Jessie H. Roberson

SUBJECT: Request for Board Action by Board Member Sean Sullivan to Direct OTD to Postpone FY16 Activity re Toxicological Consequences at UPF

Doc Control#2016-300-009

Approved _____

Disapproved _____

Abstain _____


Recusal – Not Participating _____

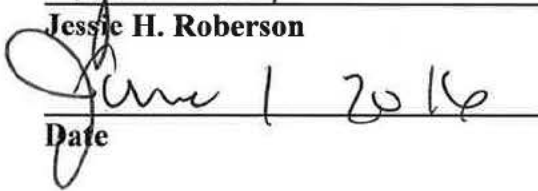
COMMENTS:

Below _____

Attached _____

None _____



Jessie H. Roberson


Date

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

NOTATIONAL VOTE RESPONSE SHEET

FROM: Sean Sullivan

SUBJECT: Request for Board Action by Board Member Sean Sullivan to Direct OTD to Postpone FY16 Activity re Toxicological Consequences at UPF

Doc Control#2016-300-009

Approved X **Disapproved** _____ **Abstain** _____

Recusal – Not Participating _____

COMMENTS: **Below** X **Attached** _____ **None** _____

The request seeks a delay for the remainder of the fiscal year in staff activity directed towards potential toxicological consequences at the new Uranium Processing Facility currently under design by NNSA contractors. The requested delay would provide an opportunity during our FY17 work planning process to reassess whether the subject area should be further pursued by our staff.

Our efforts on UPF could potentially impact the public health and safety in a negative way. The 9212 facility is long overdue for retirement, and the longer it must operate the greater the safety risk at Y-12 will be. If our actions on UPF were to cause further delay or unnecessary cost in the design, construction and eventual operation of that new facility, any reduction we might achieve in safety risk at UPF will be offset by continued operations in the outdated 9212 facility. This safety trade-off suggests that we proceed cautiously.

I am not convinced that there is significant safety gain to be achieved by further pursuit of potential toxicological consequence issues at the new UPF, and I am concerned that our pursuit of these issues unnecessarily consumes NNSA's resources. Our staff has planned a mid-June review of the UPF project team's toxicological materials consequence analysis. Even a cursory look at the agenda sent by our staff to the UPF project team makes clear that a great deal of effort will be required by the project team to meet the demands of our staff. In preparation for the review, our staff has requested from the project team various information, including an explanation as to why the project team intends to invoke certain DOE limits instead of the toxicological limits of the American Industrial Hygiene Association, a breakdown of toxicological material-at-risk by chemical compound type to include how that breakdown would be altered if materials burn in a fire, and a justification for the selection of certain factors used in

an eight factor mathematical formula for estimating threshold (i.e., "safe") material-at-risk values.

We have the time available for a careful review by the Board of the safety risk trade-offs involved. While our statute requires us to advise the Secretary of Energy during the design of a new facility should we find changes are needed to ensure the adequate protection of the public health and safety, the statute only requires us to render advice "within a reasonable time" before construction begins. Construction is at least 15 months away, therefore the staff's planned mid-June review is not yet time-critical.

In summary, we should proceed cautiously and we have the time available to do so. The staff's planned activity should be delayed.



Sean Sullivan

6/1/16

Date

Shelby Qualls

From: Daniel J. Santos
Sent: Wednesday, June 01, 2016 11:15 AM
To: Shelby Qualls; Lotus Smith
Subject: RE: Notational Vote Doc#2016-300-009, Request for Board Action by Board Member Sean Sullivan to Direct OTD to Postpone FY16 Activity re Toxicological Consequences at UPF - BLUE FOLDER

Disapproved without comments.

From: Shelby Qualls
Sent: Wednesday, June 01, 2016 10:58 AM
To: Mark Welch <[REDACTED]>; James Biggins <[REDACTED]>; Neysa Slater-Chandler <[REDACTED]>; Steven Stokes <[REDACTED]>; Katherine Herrera <[REDACTED]>; Nora Khalil <[REDACTED]>; Bruce Hamilton <[REDACTED]>; Daniel J. Santos <[REDACTED]>; Jessie Roberson <[REDACTED]>; Joyce Connery <[REDACTED]>; Sean Sullivan <[REDACTED]>
Cc: Lotus Smith <[REDACTED]>; Shelby Qualls <[REDACTED]>
Subject: Notational Vote Doc#2016-300-009, Request for Board Action by Board Member Sean Sullivan to Direct OTD to Postpone FY16 Activity re Toxicological Consequences at UPF - BLUE FOLDER

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: Request for Board Action by Board Member Sean Sullivan to Direct OTD to Postpone FY16 Activity re Toxicological Consequences at UPF

DOC# 2016-300-009

Office Directors have provided their input.

Approved _____
Disapproved _____
Abstain _____
Recusal – Not Participating _____

COMMENTS:

Below _____
Attached _____
None _____

Shelby Qualls
Assistant Executive Secretary
Office of the Chairman

Lotus Smith

From: Shelby Qualls
Sent: Wednesday, June 01, 2016 12:09 PM
To: Bruce Hamilton
Cc: Lotus Smith
Subject: RE: Notational Vote Doc#2016-300-009, Request for Board Action by Board Member Sean Sullivan to Direct OTD to Postpone FY16 Activity re Toxicological Consequences at UPF - BLUE FOLDER

Received, thanks.

From: Bruce Hamilton
Sent: Wednesday, June 01, 2016 11:33 AM
To: Shelby Qualls <[REDACTED]>
Subject: RE: Notational Vote Doc#2016-300-009, Request for Board Action by Board Member Sean Sullivan to Direct OTD to Postpone FY16 Activity re Toxicological Consequences at UPF - BLUE FOLDER

I approve.
I have no comments.

Bruce Hamilton
Global cell & text: [REDACTED]

From: [Shelby Qualls](#)
Sent: 6/1/2016 10:57
To: [Mark Welch](#); [James Biggins](#); [Neysa Slater-Chandler](#); [Steven Stokes](#); [Katherine Herrera](#); [Nora Khalil](#); [Bruce Hamilton](#); [Daniel J. Santos](#); [Jessie Roberson](#); [Joyce Connery](#); [Sean Sullivan](#)
Cc: [Lotus Smith](#); [Shelby Qualls](#)
Subject: Notational Vote Doc#2016-300-009, Request for Board Action by Board Member Sean Sullivan to Direct OTD to Postpone FY16 Activity re Toxicological Consequences at UPF - BLUE FOLDER

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

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SUBJECT: Request for Board Action by Board Member Sean Sullivan to Direct OTD to Postpone FY16 Activity re Toxicological Consequences at UPF

DOC# 2016-300-009

Office Directors have provided their input.

Approved _____
Disapproved _____
Abstain _____
Recusal – Not Participating _____