



Defense Nuclear Facilities Safety Board

Compliance Plan for OMB Memorandum M-25-21, *Accelerating Federal Use of AI through Innovation, Governance, and Public Trust*

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REVISION HISTORY

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1. Background

The Defense Nuclear Facilities Safety Board (DNFSB) is a federal agency established to provide independent nuclear safety oversight for the Department of Energy's nationwide network of defense nuclear facilities. As a small agency¹ charged with oversight of a vast national security enterprise, harnessing the benefits of artificial intelligence (AI) is essential to maximize operational efficiency and mission delivery. To effectively leverage this technology, DNFSB leadership is driving adoption of AI tools within a governance structure that ensures appropriate risk management and transparency to safeguard public trust. Compliance with the requirements of Office of Management and Budget (OMB) memorandum M-25-21² is a cornerstone of DNFSB's ongoing efforts to operationalize AI technology responsibly.

2. Driving AI Innovation

Since the agency's inception in 1988, DNFSB has generated an expansive collection of information characterizing the design, construction, operation, and decommissioning of DOE defense nuclear facilities and the nuclear safety standards used to govern these activities. Emergent AI technology can unlock new opportunities to maximize the utility of these specialized data sets produced over decades by agency technical experts. To realize benefits from advances in American AI technology, DNFSB is working to acquire and optimize AI tools that can leverage high value agency data, while protecting sensitive information from unauthorized use or disclosure. Alongside mission enabling tools that derive insights from agency, DOE, and industry data, DNFSB also intends to implement AI use cases aimed at streamlining mission support and administrative workflows across the organization.

2.1. Removing Barriers to the Responsible Use of AI

DNFSB leadership is actively driving agency efforts to adopt AI technology and innovate tools to promote operational efficiency and mission delivery. To accelerate AI-related planning and deployment, agency leaders established an AI Working Group to remove barriers and facilitate responsible AI use. AI Working Group activities are coordinated by DNFSB's Chief AI Officer, and its membership includes senior executives and subject matter experts from across the organization. This integrated working group is responsible for developing strategies related to the acquisition, optimization, risk management, training, and effective deployment of AI tools for agencywide use.

To maximize efficiency and minimize costs, the AI Working Group is engaging the General Services Administration (GSA) to explore streamlined and affordable access to leading American AI technology through GSA's recently launched USAi platform. The Chief AI Officer, in consultation with the AI Working Group, will provide a determination to DNFSB leadership on the USAi platform's acceptability in meeting agency AI technology needs.

¹ As of September 2025, DNFSB employs 110 staff members with a statutory maximum of 130.

² OMB Memorandum M-25-21, *Accelerating Federal Use of AI through Innovation, Governance, and Public Trust*, dated April 3, 2025.



To ensure the agency's repository of specialized nuclear safety information is properly configured for eventual use in AI tools, the AI Working Group will orchestrate efforts to curate, categorize, and format high value data. The working group, under the supervision of the Chief AI Officer, is also preparing agency policies and risk management protocols to govern the responsible use of generative AI technology. This work includes developing processes to maintain and update DNFSB's annual AI use case inventory, identifying AI use cases that are 'high-impact' with respect to public safety or citizen's rights, and establishing enhanced safeguards to monitor and control high-impact use cases prior to their implementation.

2.2. Sharing and Reuse

DNFSB's plans to acquire AI technology through GSA's USAi platform will enable agencywide access to frontier AI models and resources. To support the rollout process, the AI Working Group will convene AI familiarization and training sessions across the organization to prepare staff for successful adoption of AI tools. As DNFSB accumulates experience with AI technology, the working group will host periodic intra-agency discussions to share innovative AI use cases and best practices. Recognizing the importance of data in maximizing the value of AI tools, DNFSB will share curated data repositories and data management techniques across organizations. DNFSB representatives will also participate in governmentwide Chief AI Officer Council meetings and other relevant AI communities of practice.

2.3. AI Talent

As a small agency, DNFSB does not currently have dedicated AI staff. The agency's goal is to use limited technology piloting and tool prototyping to build AI expertise within the AI Working Group and then deliver a series of broad-based tutorials and demonstrations to expand AI fluency across the broader workforce. Staff engagements will cover AI capabilities, use cases, agency policies, and risk management protocols. Following initial implementation of AI tools, the working group will host periodic user group discussions to share lessons learned, best practices, and ideas for future innovations. DNFSB will also participate in government forums, training sessions and other offerings to gain insight into best practices and innovative use cases.

3. AI Maturity Goals

Due to agency size, DNFSB has adopted a streamlined but effective governance model for AI oversight. The agency maintains a cross-functional AI Working Group, coordinated by the Chief AI Officer and accountable to the Executive Director of Operations, to develop governance policies and risk management protocols for senior leadership review and approval. This body orchestrates internal policy alignment, risk review, and cross-agency collaboration. The approach is designed to ensure appropriate scrutiny, documentation, and compliance without creating unnecessary administrative burden.



3.1. AI Governance Board

As a non-Chief Financial Officer Act agency, DNFSB is not required to establish a formal AI Governance Board. However, the agency has created a cross-functional AI Working Group, coordinated by the CAIO. This group includes representatives from each agency element and includes expertise in nuclear safety oversight (i.e., mission execution), risk management, information technology, cybersecurity, legal, procurement and acquisition, and sensitive information protection. This interdisciplinary working group develops and executes strategies to comply with federal direction governing responsible adoption of AI technology. The AI Working Group also ensures DNFSB is represented in OMB's Chief AI Officer Council and other relevant AI communities of practice.

3.2. Agency Policies

DNFSB is developing a Generative AI policy and updating existing internal procedures to govern the adoption and responsible use of AI tools to promote mission delivery and operational efficiency. The AI Working Group will support the Chief AI Officer in drafting the Generative AI policy directive to establish a framework for managing AI use cases before, during, and after initial deployment. Aligned with OMB guidance, the policy is scheduled for approval by January 2026. It will incorporate OMB-mandated requirements for AI use case review, inventory compilation, and risk management. Additionally, the policy will ensure full compliance with federal direction concerning AI technology acquisition, cybersecurity standards, and intellectual property protection.

3.3. AI Use Case Inventory

The AI Working Group is developing a streamlined process to collect and document input from each organizational element on planned AI use cases that will be approved and implemented once DNFSB acquires access to either USAi or another acceptable platform. The Chief AI Officer will maintain the central inventory. For each use case, DNFSB will document all information specified in OMB guidance, including a determination of whether the use case meets the high-impact designation defined in OMB memorandum M-25-21. DNFSB will also assess and document the quality of the information received from the USAi platform for approved use cases. Use case inventory updates will be solicited annually and at the time of significant changes.

4. Shared Services and External Collaboration

DNFSB has established an interdisciplinary AI Working Group to coordinate shared agency services and inter-agency collaborations related to the responsible use of AI tools. This working group is developing processes to review AI use cases and manage attendant risks. The AI Working Group also supports the Chief AI Officer in external collaborations with communities of



practice that diffuse knowledge, lessons learned, and best practices related to AI adoption and innovation.

4.1. Determinations of Presumed High-Impact AI

The AI Working Group is developing a process to review all AI use cases against the high-impact criteria established in OMB memorandum M-25-21. This process will ensure that any AI applications supporting oversight activities, organizational decision-making, or public interactions are evaluated for their potential effect on safety or rights and are managed appropriately.

4.2. Implementation of Risk Management Practices and Termination of Non-Compliant AI

The AI Working Group is responsible for conducting all required pre-deployment reviews and AI impact assessments for high-impact use cases. AI applications that do not meet established minimum safeguards will not be implemented until appropriate risk mitigation measures are in place. The Chief AI Officer maintains the authority to suspend or revoke the use of any AI application, based on input and recommendations from DNFSB's AI Working Group.