

Replace the entire text of the cover letter with the following revised text:

“The safety bases for several defense nuclear facilities at the Savannah River Site (SRS) rely on programmatic administrative controls to perform credited safety functions in lieu of specific administrative controls (SACs). This practice is inconsistent with the Department of Energy’s (DOE) requirements and expectations for SACs, and it can lead to inadequate safety controls for nuclear hazards.

“The attached Staff Issue Report offers details and is provided for your use as appropriate.”

**AFFIRMATION OF BOARD VOTING RECORD**

**SUBJECT: Amendment by Vice Chairman Hamilton to YELLOW FOLDER Doc#2017-100-066, Designation of Specific Administrative Controls at the Savannah River Site**

**Doc Control#2017-100-066A**

The Board, with Board Member(s) Sean Sullivan, Bruce Hamilton *approving*, Board Member(s) Jessie H. Roberson, Joyce L. Connery *disapproving*, Board Member(s) none *abstaining*, and Board Member(s) Daniel J. Santos *not participating*, have voted to disapprove the above document on July 24, 2017.

The votes were recorded as:

	APRVD	DISAPRVD	ABSTAIN	NOT PARTICIPATING*	COMMENT	DATE
Sean Sullivan	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	07/24/17
Bruce Hamilton	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	07/21/17
Jessie H. Roberson	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	07/21/17
Daniel J. Santos	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	07/24/17
Joyce L. Connery	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	07/21/17

\*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:** Sean Sullivan

**SUBJECT:** Amendment by Vice Chairman Hamilton to YELLOW FOLDER Doc#2017-100-066, Designation of Specific Administration Controls at the Savannah River Site

**Doc Control#2017-100-066A**

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

**Recusal – Not Participating**       

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

The amendment sends the staff's Issue Report to the Secretary for use as appropriate. The amendment eliminates a proposed DOE briefing to the Board pursuant to 42 U.S.C. § 2286b(d).

I find it necessary to remove the reporting requirement, and therefore I support the amendment.

42 U.S.C. § 2286b(d) provides, "The Board may establish reporting requirements for the Secretary of Energy which shall be binding upon the Secretary. The information which the Board may require the Secretary of Energy to report under this subsection may include any information designated as classified information, or any information designated as safeguards information and protected from disclosure ..."

The clear purpose of § 2286b(d) is to obtain information. Here, the DNFSB has had full access to Department of Energy personnel and procedures at the Savannah River Site. There is no further information to be obtained.

The amendment aside, the proposed correspondence seeks a briefing from DOE on practices at SRS which we are thoroughly versed in already. I see no purpose in such an exercise except to provide an opportunity for individual Members to express their dissatisfaction with the present state of DOE's affairs. That is not the purpose of § 2286b(d), and not an appropriate use of DOE's time.



**Sean Sullivan**

  7/24/17    
**Date**

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

**FROM: Bruce Hamilton**

**SUBJECT: Amendment by Vice Chairman Hamilton to YELLOW FOLDER Doc#2017-100-066, Designation of Specific Administration Controls at the Savannah River Site**

**Doc Control#2017-100-066A**

Approved   X                        Disapproved                             Abstain         
Recusal – Not Participating       

**COMMENTS: Below   X   Attached        None**

The Board should generally practice a narrow interpretation of its statutory authority in to require reports. This authority should be used with discretion, such as when information has been difficult to obtain through informal staff-to-staff interaction or when periodic recurring reports on program status are warranted. 42 U.S.C. § 2286b(d) should not be used as a mechanism to convey either an explicit or an implied inducement for the DOE to carry out an activity. In this case, that might appear to be the message.

This Amendment removes the reporting requirement from the correspondence. I therefore approve.

  
**Bruce Hamilton**

21 JULY 2017  
Date

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

**FROM:** Jessie H. Roberson

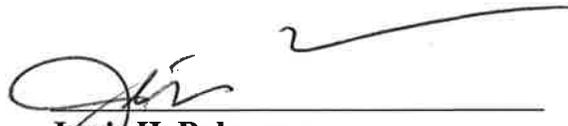
**SUBJECT:** Amendment by Vice Chairman Hamilton to YELLOW FOLDER Doc#2017-100-066, Designation of Specific Administrative Controls at the Savannah River Site

**Doc Control#2017-100-066A**

Approved \_\_\_\_\_ Disapproved  X  Abstain \_\_\_\_\_  
Recusal – Not Participating \_\_\_\_\_

**COMMENTS:** Below  X  Attached \_\_\_\_\_ None \_\_\_\_\_

**I support including the reporting requirement as it is consistent with the Board's statutory authorities and will serve to provide information directly from DOE that will aid me in my evaluation of the safety significance of their unique approach to utilizing programmatic administrative controls to perform credited safety functions - rather than safety controls derived from and contiguous with the specific hazards associated with the actual activity or operation.**

  
\_\_\_\_\_  
Jessie H. Roberson  
07/27/2017  
\_\_\_\_\_  
Date

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

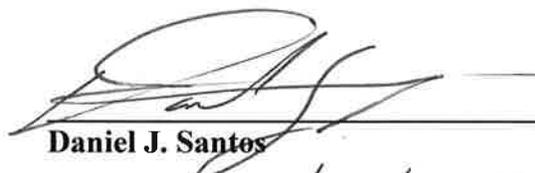
**FROM:** Daniel J. Santos

**SUBJECT:** Amendment by Vice Chairman Hamilton to YELLOW FOLDER Doc#2017-100-066, Designation of Specific Administration Controls at the Savannah River Site

**Doc Control#2017-100-066A**

**Approved** \_\_\_\_\_ **Disapproved** \_\_\_\_\_ **Abstain** \_\_\_\_\_  
**Recusal – Not Participating**   X  

**COMMENTS:** Below \_\_\_\_\_ Attached \_\_\_\_\_ None \_\_\_\_\_

  
\_\_\_\_\_  
**Daniel J. Santos**  
\_\_\_\_\_  
7/24/17  
\_\_\_\_\_  
**Date**

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

**FROM:** Joyce L. Connery

**SUBJECT:** Amendment by Vice Chairman Hamilton to YELLOW FOLDER Doc#2017-100-066, Designation of Specific Administration Controls at the Savannah River Site

**Doc Control#2017-100-066A**

**Approved** \_\_\_\_\_

**Disapproved**

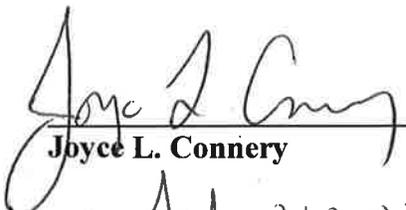
**Abstain** \_\_\_\_\_

**Recusal – Not Participating** \_\_\_\_\_

**COMMENTS:** **Below** \_\_\_\_\_

**Attached** \_\_\_\_\_

**None**

  
\_\_\_\_\_  
**Joyce L. Connery**  
**Date** July 21, 2017