

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

Public Meeting on Board Recommendation 2019-01,  
*Uncontrolled Hazard Scenarios and 10 CFR 830  
Implementation at the Pantex Plant*

December 12, 2019

4:00 p.m.

Defense Nuclear Facilities Safety Board  
625 Indiana Avenue, NW  
Washington, DC 20004

1 >> HAMILTON: Good afternoon, everyone. My name is Bruce Hamilton. I'm the Chairman of the  
2 Defense Nuclear Facilities Safety Board. I will preside over today's public meeting. I now call this meeting  
3 to order. I would like to introduce my colleagues on the Board. To my left is Board Member Jessie  
4 Roberson. To my right, Board Member Joyce Connery. We three constitute the Board.

5 The Board's acting general counsel Mr. Joseph Gilman is seated to my far right. The purpose of this  
6 meeting is to provide an opportunity for the National Nuclear Security Administration to brief the Board  
7 on the status of the Department's implementation plan for Board Recommendation 2019-01 regarding  
8 uncontrolled hazards and 10 CFR 830 implementation at the Pantex Plant to discuss Board concerns  
9 with the implementation plan and to discuss additional actions to improve the Pantex Plant safety basis.

10 On October 28th of 2019 this meeting was publicly announced on the Board's Website. Notice of  
11 this meeting was published in the Federal Register that same day. This concludes my opening remarks. I  
12 will now turn to my fellow Board Members for their opening remarks. Ms. Roberson.

13 >> ROBERSON: Thank you Mr. Chairman and Board Member Connery. Thank you Mr. McConnell  
14 and Ms. Robbins for your willingness to seek the opportunity to directly brief and discuss with us your  
15 plans in response to the Board's recommendation on needed actions to address safety at the Pantex  
16 plan. I thank you for your openness and seriousness with which you approach the Board's  
17 recommendation as evidenced by your acceptance in actions taken to date.

18 Actually since the early 2000s the NNSA has required it's contractor or contractors to undertake a  
19 number of action plans intended to address some of the issues raised in the Board's recommendation --  
20 in the Board's correspondence dating back to 2010 and resulting in the subject recommendation last  
21 year. This year, last year. But as those action plans have fallen short, failed to be executed or  
22 demonstrated that the prescribed actions did not actually remedy the intended concerns the adequacy  
23 for safety controls of nuclear explosive operations at the Pantex Plant and the processes that ensure  
24 those operations are safe -- that those operations have a robust safety basis have suffered.

25 I want to thank both of you and your staffs for your engagement and support of the Board's work  
26 to complete its focus reviews over the last two years, which underpinned the recommendation. That  
27 kind of cooperation well serves both our agencies legislative mandates supporting safety operations in  
28 the defense nuclear facilities where you execute your national security missions.

29 I also want to acknowledge that you yourselves reach similar conclusions about the shortcomings of  
30 a number of the Pantex safety basis independent of the Board's work and we evaluated information  
31 from your own assessments and work products along with our own work to reach the conclusions  
32 presented in the recommendation.

33 I look forward to your briefing today and hope we can find closure to the gaps in the  
34 implementation plan so that we can all have confidence in what responsive actions will be undertaken  
35 at the Pantex Plant in support of its important mission.

36 Mr. Chairman, that concludes my opening comments. Thank you.

37 >> HAMILTON: Thank you Ms. Roberson. Board Member Connery.

38 >> CONNERY: Thank you. I would like to also associate myself with Ms. Roberson's remarks  
39 particularly about the openness with which our staff received and obtained information in their work  
40 leading up to this recommendation. I want to thank Mr. McConnell and Ms. Robbins for taking time to

1 brief us today on the implementation plan for Recommendation 2019-1.

2 As you are aware, and I emphasize this for members of the public who may be tuning in, that Board  
3 issues recommendations to the Secretary of Energy on matters it considers to have potential to  
4 compromise public health and safety. Pantex, a critical part of the nuclear weapons complex was  
5 specifically added to the Board's oversight mission through an amendment to our statute in the National  
6 Defense Authorization Act of 1992 and '93. The mission of Pantex is integral to the nation's nuclear  
7 deterrent and as such, risk mitigation to prevent accidents at the facility are not only matters of health  
8 and safety but also matters to preserve our deterrent.

9 I'm grateful, therefore, that the Department has accepted the recommendation and I'm assuaged  
10 in knowing that Ms. Robbins, who has significant command of this site, its processes, its risks and  
11 challenges is here to speak on the efforts not only to answer the questions we pose in our  
12 recommendation and in subsequent correspondence but also to provide insights on actions being taken  
13 at Pantex to ensure that the operations at Pantex have a robust safety basis.

14 As we noted in our response to the Department's implementation plan we saw the plan is falling  
15 short of addressing the intent of our recommendation and we hope we can resolve these shortfalls  
16 through dialogue and potentially revise the plan to meet the intent of the recommendation. We are  
17 holding this meeting in public because it's the discussion of an active recommendation and therefore,  
18 we felt compelled to hold this discussion in the sunshine as is dictated by our statute and because it's a  
19 matter of public interest.

20 Mr. McConnell, you participated in a similar discussion about a month or so ago with regards to the  
21 Board's recommendation on the Savannah River's treatment facility. In that instance, the Secretary  
22 decided to reject the Board's recommendation while also providing information as to how the  
23 Department would address those very same issues we raised, a matter that remains perplexing to me.  
24 While I look to Ms. Robbins to address our detailed concerns with regard to the implementation plan,  
25 what I hope to understand from you is the Department's seeming inconsistency in the responses to the  
26 Board recommendations as well as an understanding of the agency's -- sorry; of the Department's  
27 oversight in general from headquarters.

28 Also of concern to me and I believe to the Board as a whole is the seeming discontinuation of the  
29 practice of Board staff interaction with the site offices during the drafting of an implementation plan. In  
30 was a long-held practice outlined in detail in the interface manual between the Department and the  
31 Board that was then superseded by the now infamous Order 140.1, which seems to devalue such  
32 collaboration. Our mission is to provide advice to the Secretary of Energy in his role as operator and  
33 regulator of defense nuclear facilities in providing adequate protection of health and safety at such  
34 facilities.

35 Our mission is not, I submit, in contrast of yours but in support of yours to carry out the work of the  
36 nation by guaranteeing its stockpile. So I look forward to the dialogue. Thank you. That concludes my  
37 opening remarks.

38 >> HAMILTON: Thank you, Ms. Connery. For the structure of this meeting we'll start with the NNSA  
39 briefing, during which we may ask some clarifying questions. And following the briefing, we will review  
40 the recommendation and implementation plan to make sure we haven't missed anything that NNSA

1 wants to share with us or to see if we have any lingering questions.

2 With that I will now turn things over to Mr. James McConnell, the Associate Administrator for  
3 Safety Infrastructure and Operations in the National Nuclear Security Administration. Mr. McConnell is  
4 also the central technical authority responsible for safety policy and interpretation throughout NNSA.

5 Also representing NNSA is Ms. Teresa Robbins, the manager for the NNSA's Production Office.

6 Mr. McConnell.

7 >> McCONNELL: Thank you, Mr. Chairman, members of the Board, for this opportunity to discuss  
8 the Department of Energy's implementation plan for recommendation 2019-1.

9 As I have said before, most recently at the last public meeting, DOE and NNSA welcome and value  
10 constructive feedback from the Board to help us advance our mutual goal of ensuring the Department's  
11 vital missions are executed safely. As I have also said before in the past, I am particularly grateful for the  
12 12 years that I spent as a staff member on the DNFSB working on your side of this mutual partnership.  
13 And I guess at this session it's probably irrelevant that I spent two years as DNFSB site representative at  
14 Pantex.

15 As you indicated in your October 28th letter, I would like to address some of the specifics of the  
16 issues concerning the implementation plan. And then subsequent to your questions, I'll turn over to my  
17 colleague for more detailed discussions.

18 The recommendation states that the Board finds that DOE and NNSA need to take action to ensure  
19 adequate protection from hazards associated with nuclear operations at Pantex are sustained. DOE  
20 shares the view that we should continue to improve the safety basis at Pantex and we accepted the  
21 recommendation.

22 DOE and NNSA have fulfilled all actions required under the Atomic Energy Act regarding DNFSB  
23 Recommendation 2019-1.

24 So I would like to reemphasize that we did accept the recommendation and go on that we believe  
25 that our implementation plan is a good faith effort to address the Board's recommendation.  
26 Understanding that we have subsequently received from you information that we regard as valuable  
27 feedback on the quality of our implementation plan. We'll get into that in more detail in a little while.

28 A couple of other items about the implementation plan. It clearly references actions that were  
29 completed prior -- between the time that the Board and its staff provided feedback to us on issues that  
30 were captured in the recommendation and the time that we finished the implementation plan. So some  
31 of the actions in the implementation plan came across as complete on the day that the implementation  
32 plan was approved.

33 The other thing that's quite obvious is that we did not structure the implementation plan to provide  
34 a point-to-point correlation to the items identified in the 38 pages of backup material that the Board  
35 provided with its recommendation.

36 Another key point, some elements of our implementation plan describe ongoing actions to evaluate  
37 issues at Pantex and then develop more specific responses. While we would all like to be at the point of  
38 implementing change, many of these issues are complicated and nuanced. Indeed, as the Board has  
39 pointed out, several previous improvement efforts have not been fully successful. This implementation  
40 plan highlights several areas why NNSA and its M&O partners are devoting significant time and effort to

1 understand issues deeply, to challenge norms, uncover root causes and ultimately develop sustainable  
2 solutions.

3 This will take time. But we strongly believe it is the best course of action.

4 The Board's October 28th letter provided feedback on specific technical issues and we thank the  
5 Board for its useful critique of our IP. Some points in particular that we will be addressing to improve our  
6 response include DOE guidance or industry standards for special tooling, design, manufacturing and  
7 maintenance; evidence to justify and explain completed actions; and the technical basis for special  
8 tooling requirements.

9 Other parts of the Board's feedback relate to what could be called issues of execution style or  
10 preference. Such as whether the Federal Government should approve the actions in the implementation  
11 plan as opposed to actions being assigned the responsibility of our M&O partner. Or the extent of the  
12 use of detailed written procedures.

13 While we appreciate the Board's perspective, we are responsible for managing and directing the  
14 operations of the Nuclear Security Enterprise and our approach is consistent with what the  
15 Administrator has articulated in the NNSA management and governance framework.

16 One particular item of ongoing disagreement concerns whether or not the actions DOE and NNSA  
17 have taken to date and have committed to take in the IP adequately address the class of hazards and  
18 accidents termed falling technician.

19 DOE and NNSA and it's M&O partners both at Pantex and at our design laboratories have been  
20 working on this issue with the Board for several years. While it's been a difficult issue, we believe that  
21 our plan to completed actions adequately define and control this hazard.

22 CNS, our M&O partner at Pantex, has developed a white paper in coordination with Los Alamos,  
23 Lawrence Livermore and Sandia on why the universal falling technician model is sufficient. This white  
24 paper is currently in review and will be finalized in 2020. We believe this will close the issue.

25 NNSA and our M&O partners subject matter experts conclude that the actions to date and the  
26 white paper adequately address the definition and control of the hazard the falling man or falling  
27 technician accident scenario.

28 But I would like to end this -- my portion of this initial discussion on a positive note. We believe that  
29 overall this interaction about Recommendation 2019-1 is an excellent example of how DOE and the  
30 Board should interface and how the function should operate. The Department developed its conclusions  
31 and actions and plans and then approved and published our implementation plan in an accountable and  
32 an open way. The Board independently evaluated our final product and provided us feedback.

33 Based on that feedback, recently events and other information, the Department of Energy has  
34 accepted the need to revise and update our implementation plan. I don't believe this is the first time  
35 you're hearing this. But it is our intention to provide a revised implementation plan to address issues.

36 When that document is completed, we will provide it to you. And we look forward to a continuing  
37 dialogue to continue to increase the quality of our responses.

38 Subject to your questions, which I suspect you probably have, I'll then turn it over to Ms. Robbins.

39 >> HAMILTON: Thank you Mr. McConnell. Let's take a little break here and let the Board Members  
40 ask questions to you and then we'll go to Ms. Robbins, if that's okay.

1 >> McCONNELL: Please.

2 >> ROBERSON: I have one question.

3 >> HAMILTON: Okay. Ms. Roberson.

4 >> ROBERSON: Let's go back to that falling man model, which you and I have sat across the table for  
5 a long time, like since 2010.

6 And I think there's been a significant investment -- sometimes I think the Board has said, you guys  
7 are overthinking it, overdoing it. However, I want to make sure I understand what you just told us.

8 Obviously we don't know what's in the model that -- in the paper that you're waiting for. But we're  
9 assuming that it's going to say permanently you are relying on the admin controls that you have  
10 previously relied on. Permanently.

11 >> McCONNELL: Our control strategy includes reliance on those administrative controls. I wouldn't  
12 say it's solely reliance on those administrative controls.

13 >> ROBERSON: So as you look at your special tooling, this is not a factor you would consider as to  
14 whether there are engineering options?

15 >> McCONNELL: Ms. Robbins will get into more detail. But one of the considerations when it comes  
16 to live loading on our tools, for example, is the loading that would result from a falling technician  
17 scenario.

18 >> ROBERSON: Okay. So you're going to talk more about it. I'll wait. I'll wait. Okay. Thank you.

19 >> CONNERY: So I just want to go back to the last thing that you said where you articulated that this  
20 is how you believe that the interaction with the Board and the Department should look. So you know,  
21 I'm -- not that I don't love having public meetings. They are great. But like I said in the past and explicitly  
22 written in the manual that was developed between the Board and the Department, it's been long our  
23 practice so that we wouldn't get into a situation in which you developed an implementation plan that  
24 may miss the mark of what we meant in our recommendation through misunderstanding or what have  
25 you. There are specific requirements that at least twice drafts would be shared with our staff so that we  
26 would have an understanding of where you were going and if we needed to make suggestions to adjust  
27 fire, so to speak, we would be able to do that.

28 Similarly to the fact that it's in our statute -- we have put in our statute with regard to the  
29 recommendations that the Department would have opportunity to look at draft recommendations and  
30 correct any misguidance that we may have about what's going on at the site.

31 So I just want to understand your position is that this is the way it should work with no interaction  
32 with the staff as the IP is being developed? I mean, let me say I'm thrilled that you guys are willing to  
33 work with us on a revision to the IP. But it sounds to me like from your perspective time is money. From  
34 our perspective time is safety delayed or deferred.

35 So I want to understand why that's in your mind a more suitable way of doing business is wait until  
36 we're done doing our homework, we'll turn it in, and we're not going to entertain any interim steps.

37 >> McCONNELL: I appreciate the question and I understand the perspective. I've worked on  
38 numerous recommendations while I was a staff member here.

39 But there are other factors, also, that -- to take into account. And one of the things that the  
40 Department of Energy and NNSA have been grappling with for a while now is the implication of -- well,

1 it's actually one of the items of integrated safety management as a principle, line management  
2 responsibility for safety.

3 It has two sides of things. One is that line has to step up and understand that it owns safety and at  
4 the end of the day, it is responsible for safety. It can't be a collateral duty assigned to some other entity.  
5 And in order to really own the responsibility, one has to be willing to step up and be held accountable  
6 for the individual or collective decisions.

7 It is -- and I'll probably get in trouble for being blunt -- more blunt than I perhaps should be. But it is  
8 a trap that the Department has fallen into more than a couple of times where our decision making and  
9 our responsibility has become -- we have relinquished that. And all we have done is given back to you or  
10 others what you said to us.

11 In the worst scenario, it's simply a way to make the other party go away by just accepting what they  
12 say. Right? That's the worst possible outcome.

13 And so over the last while, several years, the Department, as it's been looking at its culture for lots  
14 of valid reasons, has concluded that we need to make sure that we have a considered effort to ensure  
15 we re-establish to the extent it is appropriate and necessary all across the Department that we need to  
16 have and use the technical capability to reach well-considered well-defended positions. And then hold  
17 those positions in a way that we're willing to be held accountable.

18 These two things we're just talking about are both valid. What our consideration is right now is how  
19 do we end up having a situation where we can actually grow and depend on and be responsible for line  
20 management safety but still take the best use of your collective feedback. And there are other bodies  
21 like you that provide us collective feedback.

22 We think this is the appropriate model where we have good interchanges. We have open and  
23 objective willingness to hear different opinions and to improve our technical responses for the good of  
24 the mission and the public.

25 But there have to be certain steps to make sure that we can have that and have accountability at  
26 the same time. It's a position that is somewhat at odds with what you have just stated. But it is the  
27 conclusion that the Department has reached.

28 >> CONNERY: Well and I appreciate the difficulty that you have with perhaps managing your line  
29 management to make sure they are stepping up to the plate and having the responsibilities. I would say  
30 that from a safety culture standpoint, taking into account the input of the safety agency seems to be  
31 something that you would want to do. And I understand what you're saying, we take it to a point and  
32 then we go off and have our own consideration. But closing yourself off from that input could create the  
33 opposite scenario in which the line management rejects all other independent voices and has a bias for  
34 their own insight without taking anybody else into consideration.

35 So I would just say as a safety professional, I would be concerned about cutting your line  
36 management off of feedback from an outside technical staff. Obviously they have to exercise their own  
37 judgment. And they have many more things to take into consideration. We're lucky all we have to do is  
38 look at safety. You guys have to look at a bunch of other things and weigh those things. So from my  
39 standpoint I'm still not convinced that this is the best way to do business. And I would have hoped that  
40 when the Department took a decision to cut us out of something that we had been a part of for a very,

1 very long time like an implementation plan, that that conversation would have happened with the Board  
2 before it was implemented.

3 But kind of where we are where we are at this point with Pantex and I don't want to get into the  
4 philosophical debate. I would rather delve into the issues with Pantex's safety basis.

5 >> McCONNELL: And I appreciate that. At least what I think we're discussing is there's a collect  
6 information openly and without sometimes human resistance to information that is different than what  
7 you currently have or believe. We have to be open to that. Then we have to go into a mode where we  
8 make decisions. And then we have to be able to communicate our decisions clearly and openly and  
9 accept the next round of feedback.

10 We all agree that's the right process. What we're describing here is where in this iterative process  
11 do we draw the lines. And we will continue to need to work on that.

12 >> ROBERSON: One more comment because it's kind of -- and I invite you to push back on me in  
13 case I misunderstood. On the issue of the Board pushing back because it wants to make sure that any  
14 commitment to the Board is that of NNSA, not uniquely as contractor, which is kind of the opposite of  
15 what you two were saying. I think in that vein we're actually trying to make sure we are respectful of our  
16 legislative relationship and that our relationship does not run through the contractor. So however NNSA  
17 commits or not to the Board, we are looking for NNSA's commitment, not your contractor's. I just  
18 wanted to make sure of that.

19 >> McCONNELL: And I appreciate that. That makes sense. You probably read or heard or had a copy  
20 of our governance and management framework. We consider the National Security Enterprise to be a  
21 44,000-person thing which is the sum of the Federal contributors to our mission and our M&O partner  
22 contributors.

23 The implementation plan, signed by a Fed, which represents the Federal commitment from our  
24 Under Secretary to our Secretary and also implicitly to you is a Federal commitment. The steps and the  
25 method by which we team as one enterprise to achieve our objectives is one where we consider our  
26 M&O partners peers in our mission.

27 So I can understand why you could come to that conclusion. But from our perspective, you have a  
28 Government commitment. But in our approach to things and the way that we will execute in our  
29 commitments to our Secretary, it's a collaboration.

30 >> CONNERY: So can I just clarify then? Because earlier you said we want to make sure our line  
31 management understands the commitments it's making and makes those decisions. So I'm trying to  
32 reconcile that with we can make it a deliverable, a contractor deliverable, and all the Federal manager  
33 has to look at is the entirety, they don't have to understand necessarily or blessed necessarily the  
34 specific path or taken those safety considerations of any of the deliverables into effect. It seems a little  
35 contradictory.

36 >> McCONNELL: I guess the way I would describe it is that in this partnership, in this 44,000-person  
37 National Security Enterprise, our trust and our relationship with our M&O partners is that we are willing  
38 to be held accountable to the products that they produce, even if it's not something we explicitly  
39 approve through some SER or something. That the Government has the opportunity to look at a  
40 document, even if it wasn't submitted to us for approval, and find it lacking and direct our M&O



1 partners to redo it or do something different.

2 So we are willing to be accountable even to those actions where from a management and  
3 governance perspective we don't necessarily see the need to put another layer of review and approval  
4 on. Hopefully that clarifies you a little bit where we are. Whatever.

5 >> HAMILTON: Let me just say I'm a little concerned with the word commitment. My understanding  
6 of the relationship between the Board and the Department of Energy and NNSA may differ from my  
7 colleagues. Once you've accepted the implementation plan, it is your commitment to yourself, not to  
8 me. So I'm speaking only for myself. I'm not speaking for my fellow Board Members but you don't owe  
9 me anything. That's your commitment. And I think that aligns with everything I've talked with the  
10 Administrator about in wanting to make sure you understand who is accountable and responsible. And  
11 you're not accountable and responsible to me. You're accountable and responsible to your organization.

12 So this is not the time to debate nuances and words. I just wanted to make it clear when we talk  
13 about commitments, we need to be careful.

14 >> McCONNELL: If I misspook -- I agree with what you said.

15 >> HAMILTON: I don't think we need to dig any further on this. Let's go on.

16 >> McCONNELL: I agree with what you said. Our implementation plan is written to our Secretary.

17 >> HAMILTON: I just have a differing view. So without objection, we'll go on to Ms. Robbins'  
18 comments.

19 >> ROBBINS: Thank you, Mr. Chairman and fellow Board Members. I appreciate the opportunity to  
20 be here with you today to discuss actions that NNSA is taking to improve the safety posture of the  
21 Pantex Plant. I would like to take this opportunity to recognize Mr. Jason Armstrong. He is our NNSA  
22 Production Office assistant manager for nuclear safety and engineering. He has over 28 years of  
23 experience in nuclear safety, both commercial and within the Government.

24 The Pantex Plant in Amarillo, Texas, is the primary site in our nation and the only site in our nation  
25 for assembly and disassembly of nuclear weapons. Pantex operations include support of nuclear weapon  
26 life extension programs, dismantlement campaigns and component testing and reliability programs.

27 In 2001 DOE issued 10 CFR Part 830 nuclear safety management. Which required DOE sites to  
28 develop documented safety analyses. During the following decade Pantex personnel developed hazard  
29 analysis reports and safety analysis reports that analyzed the many hazards associated with nuclear  
30 operations at Pantex. And identified hazard controls that ensure that Pantex workers and the citizens of  
31 west Texas are adequately protected.

32 Improvements realized during implementation of these new safety basis documents included  
33 reducing hazards such as hand lifts of explosive components and electrical insult hazards in addition to  
34 countless others. Notwithstanding the substantial improvements NNSA has made to safety and  
35 operations at the Pantex plants during the past two decades, NNSA agrees with the Board that  
36 additional actions can and should be taken to further reduce the risk inherent to nuclear explosive  
37 operations.

38 In February of this year, the Board issued Recommendation 2019-1 titled Uncontrolled Hazard  
39 Scenarios and 10 CFR 830 implementation at the Pantex Plant.

40 Several of the primary concerns the Board identified in the Recommendation 2019-1 were already

1 being addressed, as you have noted, through execution of a Corrective Action Plan that NNSA directed  
2 the Pantex Plant contractor Consolidated Nuclear Security, LLC, to develop in response to similar issues  
3 that were identified by NNSA in 2017 and 2018.

4 Notwithstanding the ongoing corrective actions and recognizing the value of the Board's  
5 suggestions, NNSA accepted Recommendation 2019-1 and in June 2019 provided the Board with an  
6 implementation plan that addresses each of the key issues identified in the recommendation.

7 Consistent with the Congress' direction codified in the Atomic Energy Act, the subject  
8 implementation plan was structured to be completed within a year. Recognizing that actions to  
9 comprehensively improve and revise the more than 25,000 page Pantex safety basis will take several  
10 years to complete.

11 To date, 16 of the 35 actions identified in the implementation plan have been completed by CNS  
12 and are under review by the NNSA Production Office. I would like to take this opportunity to highlight  
13 several of the key improvements that have been achieved during the past year.

14 First, your recommendation states, there are high consequence hazards that are not adequately  
15 controlled or may have controls but lack documentation linking the controls to the hazards. The  
16 recommendation suggested that DOE and NNSA perform an extent of condition evaluation of the Pantex  
17 safety basis and implement subsequent corrective actions to ensure compliance with DOE regulations  
18 and directives.

19 NNSA also recognized this and initiated a 16-month resource intensive effort to execute a series of  
20 comprehensive extent of condition reviews. The objectives of these reviews is to identify all instances of  
21 high-order consequences for which controls were either not identified or lacked proper documentation.  
22 These extent of condition reviews I'm happy to report are to be completed this month and have resulted  
23 in additional actions being taken to address specific high-hazard scenarios that ensure compliance with  
24 DOE requirements.

25 NPO has reviewed each of these extent of condition products as they have been completed by CNS.

26 Second, your recommendation states that the NNSA Production Office and the Pantex contractor  
27 have been unable to resolve known safety basis deficiencies. Specifically the treatment of falling  
28 technician scenarios. The recommendation suggested that NNSA implement actions to ensure controls,  
29 protect a unit from falling technician scenarios. And that the controls should be designated as specific  
30 administrative controls.

31 As my colleague, Mr. McConnell has stated, NNSA has concluded this issue is going to be worked  
32 through the white paper. In addition, we have implemented controls in all operational nuclear explosive  
33 facilities to prevent technicians from tripping and falling into vulnerable nuclear explosive configurations  
34 by removing tripping hazards and ensuring technicians approach these configurations from specifically  
35 defined safe directions. Consistent with your recommendation, Pantex formally designated and  
36 implemented these protocols as specific administrative controls.

37 I'm happy to pause here if we would like to talk more about your question, ma'am, Ms. Roberson,  
38 specifically with respect to special tooling. And whether or not we are going to do more with a dynamic  
39 environment. We have done one test. I believe you're aware of that with a specific tool. And the test did  
40 confirm that our analysis and the amount of deflection assumed in our analysis and documented in our

1 calculation was still bounding.

2 We have committed to do more of those. We do not feel, however, that it is appropriate to  
3 dynamically test every special tool. But we have committed and it is part of our implementation plan to  
4 do more dynamic testing on our special tools.

5 >> ROBERSON: I appreciate that. I think the Board appreciates that, too. I think the only other  
6 question is, as you implement actions really looking forward to ensuring the standards and  
7 requirements for safety controls, i.e., special tooling, that this is something you also consider as to  
8 whether they are engineered options so that you don't have to -- because, listen, I walk to the metro  
9 every day and I never intend to trip but I often do.

10 So I'm just saying the best of intentions. And I think we agree, it is a fine interim control. But it's not  
11 clear that it's the best when it comes to controls, whether an engineer control, if possible, would make  
12 more sense.

13 >> ROBBINS: Ma'am, we always prefer engineered over administrative controls where they are  
14 available. To date we have not been able to identify an appropriate engineered control. We do believe  
15 that the specific administrative controls do prevent the tripping technician from having an impact on the  
16 unit. And that was the purpose of the specific administrative controls. We're not ruling out engineered  
17 controls. We just don't have any that we've been able to identify or design to be effective.

18 And one of the cautions that I have always, and it's balancing all of the safety and being able to get  
19 the work done at the same time, is if we make it too hard for our production technicians to do the job,  
20 we could be creating a less safe situation. And so we have to balance that when we're putting in place  
21 physical engineered controls.

22 >> ROBERSON: And I appreciate that. And I understand -- I think you know I understand the  
23 challenge that you guys have with the variety and extent of the operations. I'm just looking to make sure  
24 that there is a closed mind to the potential for engineered controls, if they self-identify.

25 >> ROBBINS: Yes, if we were to identify an engineered control that we believe could be effectively  
26 implemented without impacting safety, we absolutely would adopt that. We are not precluding  
27 engineered controls I guess is the better way to say that.

28 >> ROBERSON: Thank you, ma'am.

29 >> ROBBINS: Okay. Continuing on, third, your recommendation states that the processes for  
30 maintaining and verifying implementation of the safety basis at Pantex are deficient, including  
31 completion of annual updates as required by 10 CFR 830.

32 NNSA recognized this deficiency, as well, and directed CNS to come into compliance with this  
33 requirement. CNS has achieved compliance with the annual update requirement by submitting updates  
34 of all 16 safety basis documents within the past year. NNSA is committed to continue to ensure that all  
35 Pantex safety basis documents are updated annually.

36 >> ROBERSON: Hi.

37 >> ROBBINS: Hi.

38 >> ROBERSON: So -- and we appreciate that. I guess we would note that those updates didn't  
39 necessarily resolve all what I call unextenuating situations, like you may have JCOs or other things that  
40 still live outside. And our hope was that in those updates, and maybe it's not this evolution, those will

1 start to get pulled in and evaluated as a part of the whole picture. And eliminate some of those hanger-  
2 onners outside.

3 >> ROBBINS: Yes, ma'am, that would be the ideal situation. We are not yet at that point. Our goal  
4 was to get us update -- get everything updated. And we had unfortunately annual updates outstanding  
5 for years. And we felt that we needed to get that taken care of. And then as we continue to mature, we  
6 will be working to get -- ensure our safety basis is maintained current. We do not want to keep  
7 justification for continued operations open for long periods of time. And I am going to talk about that, as  
8 well.

9 But that is our goal.

10 >> McCONNELL: If I might add, as Ms. Robbins said, with a 25,000 page safety basis that some  
11 people may be tempted to describe as Byzantine, it is difficult to maintain configuration management. It  
12 is difficult to resolve one issue without knowing you are inadvertently creating another. So we have a  
13 very large number of reasons to question whether what we're doing is consistent with what we  
14 intended to do. Partly because of the complexity and the sheer volume and interaction of our safety  
15 basis.

16 So one of the things -- well, it's not necessarily in the best way to approach safety because it's very  
17 hard for workers to ensure that they are doing what's right when there are so many things to try to keep  
18 in mind. So coming up with a more holistic, a more executable, a more comprehensive safety basis,  
19 some of which might, for example, passive engineered features remove a lot of complexity, is a way to  
20 cut down on that carrying cost, if you can let me use that term, of how to continuously monitor our  
21 safety basis.

22 And so that effort, which is well underway but it's a very substantial effort, will hopefully mean  
23 fewer reasons to have a justification for continued operation in the first place. And therefore, they won't  
24 have to be folded into a future PSA.

25 >> ROBERSON: Thank you.

26 >> ROBBINS: Okay. Fourth, your recommendation states that some justifications for continued  
27 operations also known as JCOs last for several years without updating the relevant safety basis  
28 document relying on compensatory measures without implementing rigorous controls. NNSA has  
29 ensured all JCOs, justification for continued operations, that had been in place for more than a year  
30 were incorporated into approved safety basis documents and that controls have been rigorously  
31 implemented.

32 Fifth, your recommendation states that NNSA has been unable to resolve several legacy conditions  
33 of approval. Although the recommendation acknowledged that prior to the creation of NPO there were  
34 40 conditions of approval and only -- I believe the recommendation said five but I believe there are six  
35 currently remain open, NNSA has developed a schedule to address five of the conditions of approval by  
36 this upcoming March of 2020, which is four months from now -- well, three and a half, we'll go there.  
37 And the remaining condition of approval will be resolved in 2021 as it requires physical modification.

38 >> ROBERSON: Yeah, we were given a discount on that one. No, I'm just kidding.

39 >> ROBBINS: Oh.

40 [BACKGROUND TALKING].

1 >> ROBERSON: So when you say resolve, does that actually eliminate the condition of approval or  
2 generate a plan or schedule to resolve?

3 >> ROBBINS: So it's resolved. So an example of that is we needed to do a pool fire in a certain  
4 facility, an analysis of a pool fire. That analysis will be completed and incorporated into the safety basis  
5 document. The one I'm talking about with physical modification, in order to eliminate the hazard, we  
6 actually have to go in and remove something in order to resolve that. And that -- Mr. McConnell is  
7 supporting us through funding to do those kind of activities.

8 >> ROBERSON: Well, I think that in and of itself will be a great achievement because these have  
9 been hanging out for a lot of years. So 2021, is that what I heard?

10 >> ROBBINS: Yeah, 2021.

11 >> ROBERSON: Great, thank you.

12 >> ROBBINS: Yes, ma'am. And that will be one remaining after March of 2020. March of 2020 we'll  
13 have the five resolved and then in 2021 we'll have the completion of the fiscal modification.

14 >> ROBERSON: Thank you.

15 >> ROBBINS: You're welcome. Those accomplishments aside, six weeks ago the Board informed  
16 DOE of specific concerns you have regarding the implementation plan. I look forward to discussing those  
17 concerns in more detail during this public meeting. But it is worth sharing now that NNSA senior  
18 management is currently planning to revise the implementation plan as my colleague Mr. McConnell has  
19 stated. Based in part on the feedback you have provided.

20 The scope of this revision is notionally focused on including additional improvement actions related  
21 to the Pantex Special Tooling Program and included actions related to DOE approval of key deliverables  
22 that will be developed during execution of the implementation plan.

23 I want to be very clear, I do feel ownership of the implementation plan and will ensure that each of  
24 the actions is acceptable prior to closure. As the owner, I have directed my staff to ensure cross  
25 disciplinary Federal teams formally review the applicable evidence package prior to sorry; proposing  
26 closure of each action identified in the implementation plan.

27 We have also developed a SharePoint site that is being used to track the status of each of these  
28 actions. Your resident inspectors at Pantex Mr. Zack Beauvais and Ms. Miranda McCoy have access to  
29 that database and all of the evidence packages associated with the files.

30 In addition, I have recently reinstated monthly meetings with your resident inspectors at both of  
31 my sites to ensure clear and timely communication. I do value the exchange of information and  
32 concerns.

33 I spent a full day recently at Pantex to better understand special tooling and I came away with a  
34 clearer understanding of the rigor that is in place with regard to design, procurement, testing,  
35 maintenance, and training and qualification of special tooling engineers.

36 Improvements are ongoing as a result of NNSA oversight, specifically in applying NQA-1 quality  
37 standards and strengthening maintenance work packages. However, I noted the need for additional  
38 improvements, specifically with respect to non-destructive evaluation of welds. We are strengthening  
39 the Special Tooling Program, which is one of the reasons we're revising our implementation plan.

40 Lastly, taking action to address the specific concerns identified in the Board's recommendation is

1 just one of several ongoing initiatives to improve the content, structure, configuration management and  
2 implementation of the Pantex safety basis. Other improvements achieved during the past year as a  
3 result of executing these initiatives include the following, we're increasing both the total number of staff  
4 in the Pantex safety analysis engineering group and the number of qualified safety basis analysts and  
5 unreviewed safety question evaluators.

6 We're reducing the backlog of outstanding unreviewed safety question determinations by more  
7 than 40%.

8 We're improving administrative processes associated with the development of safety basis  
9 documents which have demonstratively improved the quality of the contractor safety basis submittals.

10 We're enhancing requirements associated with the development of documentation that serves as  
11 an input to safety basis documents, such as calculations and engineering evaluations.

12 In addition, there are three key ongoing improvement initiatives that I would like to recognize  
13 during this meeting. First, NNSA is taking a suite of actions to improve the implementation of safety  
14 controls at Pantex. One key focus area for improving implementation of safety controls involves actions  
15 to enhance conduct of operations.

16 A second key focus area for improving implementation of safety controls involves actions to ensure  
17 and enhance the rigor of the control owner program and practices for monitoring control  
18 implementation.

19 Second, NNSA has kicked off an initiative to significantly revise and improve safety -- Pantex safety  
20 basis during the next five years. NNSA drove the Pantex contractor to develop a vision and execution  
21 strategy that outline the scope, objectives, and schedule associated with this extremely ambitious effort.  
22 NNSA is confident that this effort will result in simplified analysis and controls, which will, in turn,  
23 facilitate long-term efficiencies in the maintenance and implementation of the safety basis documents  
24 and the safety controls identified therein.

25 Third, NNSA has chartered a group of complex-wide subject matter experts to redesign the  
26 processes and interfaces between NNSA's design agencies, also known as our national laboratories, and  
27 our production plants that enable the production plant contractor and weapons response communities  
28 to more efficiently and effectively develop, implement and execute the Pantex safety basis.

29 This redesigned effort will likely result in revising DOE standards and take years to execute and  
30 implement. But we recognize the importance of this effort toward ensuring the long-term success of the  
31 Pantex nuclear safety mission.

32 All of these actions I have discussed reflect that we have an effective control suite in place at  
33 Pantex today to ensure adequate protection of the public. We can always do better.

34 Thank you, again, for the opportunity to being here today, I look forward to answering any  
35 questions you might have.

36 >> HAMILTON: I want to just comment, I really appreciate the fact that you're meeting with  
37 Mr. Beauvais and Ms. Mccoy on a monthly basis because our resident inspectors are the best of the  
38 best. So I was very encouraged to hear that. Ms. Connery.

39 >> CONNERY: Not that you weren't when you were there Mr. McConnell --

40 >> McCONNELL: I consider myself --

1 [CHUCKLES].

2 >> CONNERY: I actually want to address a couple of the things that you said, Ms. Robbins, because  
3 they were really wonderful to hear. I reiterate what the Chairman said, it's fantastic you're meeting with  
4 the resident inspectors on a monthly basis. They do great work and do some analyses that we don't  
5 even expect them to do and come back with some fantastic data. So I hope that you guys use that to the  
6 fullest extent in what you're doing.

7 I'm also thrilled to hear that you're going to be beefing up the safety basis staff. I think given the  
8 voluminous -- Byzantine size of the safety basis, having more Federal staff who have an understanding of  
9 it and can oversee what your contractor partners are doing I think is extremely helpful. I'm also excited  
10 to hear that you're looking at conductive operations. Because I think again that's something that we see  
11 across the board in a number of places that always can use a little bit of scrutiny in order to maintain the  
12 excellence that you have at the plant.

13 With regards to special tooling and I'm glad you went down and walked through -- so first of all, let  
14 me say special tooling at Pantex, it's an amazing and unique skill set. The skill -- the craft is incredible. I  
15 think the challenges that we saw with it is simply how do you maintain the rigor across the board? So  
16 there's rigor that goes into it. But where are the specs, the requirements, put into place so that you're  
17 not just looking at expert judgment to ensure that these components, which are so crucial of what they  
18 do in terms of the special tooling and protecting the warhead, are at a particular level? So I think that  
19 when we looked at the special tooling, that was one of the things, and you know the standards for the  
20 welds that struck us is how do you ensure that there's adequate rigor in their maintenance and in their  
21 inspection programs? So that's the first thing.

22 The other thing I wanted to say with regards to that because we know you're taking a number of  
23 actions outside of the IP, which is great. And we will stay abreast of those. I don't know if you're  
24 considering putting any of those in the IP. I understand that by statute it says you should be able to  
25 complete these things in a year. I don't think that I've ever seen a recommendation that's been  
26 completed in a year since I've been at the Board. Jessie is saying no. So probably never.

27 So if -- to the extent that it's useful to put them in the IP for completeness or for better  
28 understanding, I think that that's a helpful thing to do. But in particular one of the things that you -- that  
29 the staff has talked to us about is that you're making improvements on special tooling. And I just want to  
30 understand because my understanding is special tooling is kind of doing their own self-evaluation. And I  
31 don't know that the safety basis engineering group is involved in that. So my question, after all of that  
32 preface, is are they involved? And if they are not involved, why wouldn't you have them involved?

33 >> ROBBINS: So I can speak to -- I can't answer the question. I'll get you an answer as far as the  
34 safety basis engineering from CNS engaged in improving this Special Tooling Program? I believe they are.  
35 But I want to be confident in that answer. So I would like to get you that answer for sure.

36 I will say that one of the things that the NPO staff identified is that the work packages associated --  
37 the maintenance work packages associated with special tooling were not compliant with the nuclear  
38 maintenance management program required by order, DOE order. And so we have specified that they  
39 have to bring their work maintenance packages into compliance with that program. And CNS is actively  
40 doing that right now. So we also recognize there needed to be more rigor in how the maintenance was

1 performed and documented.

2 We also noted that while the program has always followed NNSA Policy 24 on weapons quality, it is  
3 a nuclear safety control. It needed to be procured and inspected and tested under -- NQA-1, which is our  
4 nuclear quality standard. So we are making those changes. And that came about as a result of the  
5 excellent staff that I have in NPO identifying those issues and working those with CNS.

6 >> CONNERY: And that will all be documented in the deliverable for IP or is that outside? I'm just  
7 trying to connect it to --

8 >> ROBBINS: Yes, I apologize. I forgot to follow up on that.

9 The revision to the IP -- my expectation is that we are going to include -- I've asked CNS to come up  
10 with their proposal for additional non-destructive evaluation of welds. And I expect that to be part of  
11 the revision to the IP.

12 As far as the maintenance work package improvement, that will definitely be part of consideration  
13 in the IP. I see no reason why it shouldn't be part of the IP. And then the NQA-1, we have a detailed  
14 implementation, Corrective Action Plan, associated with that, as well, that could easily be part of the  
15 implementation plan.

16 >> HAMILTON: I'm not hearing any more questions. Did you have any other remarks.

17 >> Microphone.

18 >> HAMILTON: Oh, I'm -- thank you. I'm not hearing any other questions. Did you have any other  
19 remarks that you wanted to offer?

20 >> ROBBINS: That was the conclusion of my remarks, sir.

21 >> HAMILTON: Okay. We have on our projector, if we could put it up kind of an outline of the  
22 implementation plan that we would like to use as kind of a departure for asking questions. So first of all,  
23 I'll just give everyone a minute to refresh memory on what these sub-recommendations looked like. And  
24 there they are on the screen.

25 What I would like to do is walk through what we had developed. Not to necessarily go through each  
26 one. But to give us a point of -- for my fellow Board Members and me to ask questions or kind of probe a  
27 little bit.

28 So Federal ownership of IP. Numerous IP deliverables are solely a contractor product without  
29 Federal review.

30 So any discussion?

31 >> ROBERSON: The only discussion -- I think we have talked about this one early on. But I don't  
32 know if we resolved it. But I think we did. But the thing that I would ask as we step through these, since  
33 you've seen them, you've had an opportunity to talk about them, since we don't know what a revision  
34 specifically would look like, if there are elements of our recommendation or what we identified as gaps  
35 that you're pretty sure pretty sure you're not going to address, let us know.

36 >> ROBBINS: Okay.

37 >> McCONNELL: As I said, I want to be clear that every document has Federal review. Not every  
38 document has a defined product that is a piece of paper documenting the results of our review. So it  
39 may be a nuance. But as I said before, we review all of these documents to the point where we're willing  
40 to be accountable for them.



1 >> ROBBINS: As I stated in my remarks, I have asked my team to put together -- we do oversight on  
2 a routine basis and we document that oversight through an assessment process. And we capture those  
3 products, our assessment products, in a computer system called e-Pegasus. So my team is going to be  
4 documenting their oversight assessment of each of those implementation plan deliverables through an  
5 assessment that will be captured in our e-Pegasus system.

6 So if it doesn't require our approval -- if it requires our approval, it's a safety evaluation report or  
7 something of that nature, we will not do a separate assessment in e-Pegasus. But if it's just a deliverable  
8 of a plan or a revised strategy that doesn't require our approval, we will document our acceptance of  
9 that through an assessment.

10 >> ROBERSON: And I think the last part of this question I guess I would have then as understood  
11 you, Ms. Robbins, generally speaking, the Board would have access to understand that through your e-  
12 Pegasus system that our resident inspectors have access to.

13 >> ROBBINS: Yes, ma'am.

14 >> ROBERSON: That's how we would know those are done?

15 >> ROBBINS: Yes, ma'am. Your resident inspectors we did confirm do have access to e-Pegasus and  
16 any assessment we put into e-Pegasus throughout the month gets rolled up into a monthly report that  
17 we transmit to the contractor. Your resident inspectors would be also on copy of that assessment  
18 report, as it's transmitted back to CNS.

19 >> ROBERSON: Just one follow-up and you may or may not know the answer. So we have struggled  
20 a little bit in this 140 world where the information is available at the site but we're unable to evaluate  
21 that back here. Is there any such limitation?

22 >> ROBBINS: I'm not aware of any limitation. I'm not aware of us denying any access to  
23 documentation that's been requested. We do have a process. There's a form. Your resident inspectors  
24 usually follow that. And we have our site liaisons that will work with your resident inspectors to ensure  
25 that we understand the document request and we get the documents to you in a timely manner.

26 >> ROBERSON: Thank you.

27 >> McCONNELL: And I'm sure everyone in the room understands this but just because it's a public  
28 meeting, I wanted to make sure that for the record we all identify that there are security issues related  
29 to information at Pantex. So all of these processes are appropriately handled in those regards.

30 >> ROBERSON: Thank you.

31 >> CONNERY: Yeah I think specifically the issue is sometimes the resident inspectors have access to  
32 the information but then they are not allowed to transmit it obviously properly to headquarters.  
33 Because some of the teams they have to work with are the headquarters teams. So that's the question.  
34 And I don't believe that there's a question but I think that's what you were alluding to. So we just  
35 wanted to raise that.

36 >> ROBBINS: Okay. I, too, am not aware of a problem but I encourage that if we do run into a  
37 situation of that nature, please don't hesitate to reach out or have your Technical Director reach out and  
38 we will make sure we get that resolved promptly.

39 >> CONNERY: That would be great. So I just have a quick question on -- because you talked about  
40 the assessment plans that you have -- effectiveness plans I guess for the implementation plan. You have

1 one scheduled I think six months out after the implementation plan is done. Is there any more -- are  
2 there any more planned effectiveness reviews either on the part of NPO or on the part of the  
3 headquarters that you plan to conduct following the implementation?

4 >> ROBBINS: So one of the practices that we employ is using the Department of Energy's Office of  
5 Enterprise Assessment. And we have employed them to look at where we are to date already. We have  
6 brought them in to look at the implementation plan and to look at our deliverables and the actions that  
7 CNS is submitting to make sure that we're getting what we need to in that. And my plan is to continue to  
8 use the Office of Enterprise Assessment to look at how effective we are. I would also like to take this  
9 opportunity to note that working with my colleague Mr. McConnell, he has provided us additional  
10 resources to assist in providing effective oversight of the Pantex safety basis process. He has some  
11 senior experienced nuclear safety specialist staff that he has essentially dedicated to allow us to use  
12 their expertise in how we provide oversight of this Pantex safety basis process. And that, too, has been  
13 very beneficial.

14 >> McCONNELL: One other item I might add, and both Teresa and I have mentioned it, is that we  
15 recognize that this implementation plan will be of higher quality when we add some more evidence of  
16 closure-achieving objectives. In some cases the action itself provides the evidence of closure. But there  
17 will probably be cases where that is not the case and then we will have to figure out how to establish for  
18 our own confidence that we were successful. And that would create a way to have either, you know,  
19 criteria -- you know, both line and independent assessment of those things.

20 >> CONNERY: And I understand that there's never any internecine warfare within NNSA, everybody  
21 works together fabulously. So I'm assuming that there's --

22 >> McCONNELL: My favorite person in all of NNSA.

23 >> CONNERY: I assume there's no challenges.

24 >> ROBBINS: I have to return the favor.

25 >> CONNERY: Pantex is unique because it's not just the two of you that are involved in this. It's not  
26 just headquarters and Pantex. You've got the weapons labs involved because in this case the hazard is  
27 the weapon being introduced into the facility. So I just want to make sure that as the implementation  
28 plan gets implemented that you have buy-in from the weapons labs and the other part of the complex,  
29 the stockpile stewardship program, do you feel like you have adequate support from them? And in the  
30 execution of the implementation plan. And are there going to be any hiccups from that standpoint.

31 >> McCONNELL: I'll start. There will always be some de minimis level of large organizations  
32 interacting where it's either just how to get on the same page, how to make sure everybody has the  
33 same information. One of the things that when I talked about and Teresa also discussed this, ongoing  
34 effort where we haven't yet gotten to the point of saying in some key areas exactly what we're going to  
35 do is because if we rush too quickly to one part of the large organization thinking it knows what to do,  
36 they are not accounting for all of the other parts, that might be a root cause of why some of our  
37 previous efforts didn't ultimately produce sustainable results.

38 So with Jason Armstrong, who is here in the audience, his leadership, we are very intentionally and  
39 with fairly significant amount of resource and attention from senior folks ensuring that every part of the  
40 organization that has a stake in this, because it is so complicated, is represented. And I've been in

1 meetings where two people -- two parts of the organization that have presumably working for years on  
2 the same thing, in that meeting came to an understanding that they saw the same thing differently. So  
3 those kinds of insights have been very helpful. So that's Item No. 1, part of why we have this effort going  
4 on is to make sure that we account for all those interfaces.

5 The other thing I'll point out is that we are very lucky to have as the head of defense programs right  
6 now Dr. Charlie Verdon, who spent years as the weapons response senior manager at Lawrence  
7 Livermore, who comes to his job with lots of personal experience in this very topic. And he is providing  
8 his personal Senior Leadership in topics and discussions. And both Teresa and I have spent quite a bit  
9 time talking with him about his experiences and how he and his organization can help ensure that this is  
10 a collaborative effort.

11 >> HAMILTON: Next slide, please.

12 Here we have what we believe are some unaddressed sub-recommendations, IP did not contain  
13 actions to address all of the elements of these. I'll let you read them.

14 I think we have covered that first one sufficiently. But let's see -- I don't see any other questions.

15 And the second one was maintenance and weld qualifications. Any comments? Questions?

16 >> CONNERY: No, I think you addressed that one. I do want to point out though in sub-  
17 recommendations, we focused on falling technicians. But in the document that you received, we spoke  
18 also of, you know, dropped tooling, instrument, other impacts and gauges. So I just want to make sure  
19 that this is not just about the falling man scenario. There are other scenarios -- there are other hazard  
20 analysis that fell short -- no pun intended -- in other parts of the issues.

21 >> ROBBINS: So the one thing I can share on impact scenarios, we did -- when we did the extent of  
22 condition reviews, we looked very thoroughly at all scenarios. Because we wanted to make sure we  
23 captured and identified any impact scenarios, as well, impact hazards. So we believe we did look at that  
24 in the extent of condition reviews.

25 >> HAMILTON: Next slide, please.

26 Insufficient scope in IP actions fails to fully address actions the Board specifically recommended.  
27 And there's some examples. I'll let you read them.

28 And we'll see if we have any questions.

29 >> ROBERSON: I don't know that I have any questions. Just to restate. We look forward to seeing  
30 what comes out of however you call it, improved IP and the white paper. I still feel like we're talking past  
31 each other here. But I think we need to see where you end up.

32 >> HAMILTON: Next slide, please.

33 IP responsiveness to root causes. IP may not address the causes of the deficiencies identified in the  
34 recommendation. There are some examples.

35 >> ROBERSON: I think we talked about it.

36 >> CONNERY: We talked a little bit about the special tooling and one of the issues was unclear  
37 management guidance. How do you intend to capture the guidance that you're going to be giving with  
38 regard to the special tooling in terms of NQA qualification and maintenance and what have you? What  
39 form will that take?

40 >> ROBBINS: So in looking at that, one of the considerations is what do we have in place today. And

1 when I looked at that, we have a safety management program that's unique to Pantex in our safety  
2 basis. And it's called the Special Tooling Program.

3 I reviewed that. It needs to be improved. So we're going to look at ensuring it captures all of those  
4 critical elements that we've talked about here today. In addition, the safety basis captures for each  
5 special tool the safety factors for each of the special tools. And we found that we can improve that. We  
6 need to ensure that there are functional requirements specified for all aspects of the safety factors. And  
7 that we also include performance criteria in accordance with the DOE requirements.

8 And so we are going to be upgrading that. But I do believe that since we approved the safety  
9 management program as part of the safety basis document, that should be where we specify how we  
10 expect special tooling to be designed, procured, manufactured, tested, maintained and all of those  
11 functions.

12 >> CONNERY: So I know that the Special Tooling Program is unique to Pantex and obviously you  
13 guys cornered the market on special tools across the complex. But is there anything, Mr. McConnell,  
14 from your point of view that rises to the level of this should be a complex-wide guidance document that  
15 we give on special tooling? I don't know where else in the complex that you have -- to the extent you  
16 have it at Pantex. You may have it to a lesser extent. But I just don't know if they are safety class or  
17 safety significant the way they are at Pantex.

18 >> McCONNELL: That's an excellent idea. And we'll take that into consideration. With ten seconds  
19 to think about it, I would say in many places where we have those kinds of interests, it's more about  
20 quality. And I'm talking about mission quality or product quality. Than it is necessarily about the safety  
21 class, safety significant implications at Pantex. But we'll take that question for sure.

22 >> HAMILTON: Next slide, please.

23 Plans as IP deliverables. Proposed deliverables to do provide evidence of completed actions. And  
24 there are a couple of examples.

25 >> CONNERY: [Indiscernible].

26 >> HAMILTON: Later.

27 >> ROBERSON: Yeah, I think we talked about this extensively. I don't have any additional questions.

28 >> HAMILTON: Next slide, please.

29 This is our last slide. It takes the sub-recommendations and kind of gives us a stoplight chart of our  
30 view of what we think is good, not so good, and not so good. So any comments from the Board?

31 >> ROBERSON: I would just say, yeah, it's our assessment based on largely our feedback to you  
32 after the implementation plan. So it kind of reflects where we think the significance of the gaps existed.  
33 And when we see the next version of the implementation plan, this is what we'll compare it to.

34 >> ROBBINS: Ma'am, if I could for just a second for the record, I know you stated in your opening  
35 remarks that we have endeavored within the Department to improve Pantex safety basis through a  
36 number of different efforts. My colleague, Mr. McConnell, hit on it briefly. Having Dr. Charlie Verdon as  
37 the Deputy Administrator for defense programs and Lisa Gordon-Hagerty as the Under Secretary for  
38 nuclear security and the NNSA administrator, they both are personally engaged in ensuring that we  
39 solve the Pantex safety basis improvement initiatives. In fact, this topic was discussed -- the  
40 Administrator hosts an NNSA Council. We had that NNSA Council meet on Tuesday of this week. Pantex

1 safety basis was a topic. The members of that Council, besides the Administrator, is each of the Field  
2 Office managers. And each of the laboratory directors or the plant managers.

3 And this was a topic that garnered a lot of attention. You asked if the weapons response -- the  
4 design agencies and the national laboratories are engaged in this. They definitely are. Each of the  
5 laboratory directors talked about the need to ensure that we're all on the same team as we resolve and  
6 improve the Pantex safety basis.

7 So I just wanted to share that with you. I believe that it is different this time. And you have senior  
8 level commitment all the way up to the Administrator. I'm personally engaged in this activity. They are  
9 biweekly briefings. I know my staff and the CNS staff would probably not have me interrogate them  
10 every two weeks on the status of the actions that we have committed to. But I believe that's very  
11 important.

12 I'll also point out CNS finds this very serious and they have dedicated a resource and an action  
13 officer, Mr. Dave Kupferer, he was a former member of your staff and a former resident inspector. And  
14 he is dedicated to ensuring that he's tracking and maintaining status on these and ensuring things are  
15 getting done correctly.

16 So I do believe that it's going to be different this time. We will be successful. Because it's imperative  
17 that we are.

18 >> ROBERSON: I thank you for that. And I would say I'm appreciative to hear that. I find that very  
19 gratifying and actually I think there are many benefits from other Field Office managers being a part of  
20 this. Because there are things that they could probably take home, as well, too.

21 But I would say to you, Ms. Robbins, Mr. McConnell, since 2010 I have seen a series of Boards. And  
22 there have been a series of administrators. And at the end of the day, the two of you are going to be the  
23 ones that get this done. And so I'm very glad you're here. I'm pleased that you have the support that you  
24 have. But in reality, here are the senior career folks are the ones that are going to make sure this gets  
25 done in the end.

26 >> ROBBINS: And I won't speak for Mr. McConnell. But I feel very confident when I say this, that we  
27 are both dedicated to do that, ma'am.

28 >> McCONNELL: I couldn't agree more.

29 >> HAMILTON: That's our last slide. Before we go to closing remarks, are there any other questions  
30 on the slide deck?

31 >> CONNERY: So I just want to ask the practical question. You had said that you are willing to revise  
32 the IP. And again, I understand the position that you took at the beginning that, you know, it's up to you  
33 guys to make the decisions and then you get feedback from us. I'm hoping at this point you are willing to  
34 have the conversations with our resident inspectors and our staff who are familiar with at least what the  
35 Board is thinking to help you understand where our concerns are in addition to this meeting.

36 So I'm just kind of looking forward to the next steps. We don't have to decide it here. But I can  
37 leave that question open-ended. But it would be helpful for us to know that our staff is engaged because  
38 we are seized of this issue and we will remain so. And I just don't want to kind of wait for something else  
39 to get lobbed over the transom. And not know what to expect. Other than what you said here today.  
40 Thanks.

1 >> McCONNELL: I appreciate that. As I said, there was a robust amount of information backing up  
2 the recommendation to begin with. The letter you sent on comments was very useful. But it was  
3 necessarily fairly high level. So I think we would love to take you up on that offer to make sure that at a  
4 technical staff level we have the best understanding of where you currently sit in your perspective of  
5 what we're doing so that we don't end up going in a direction that we think is responsive but for  
6 whatever reason is not. Thank you.

7 >> HAMILTON: Since we are in a public meeting, are there any other items that you want to  
8 deliberate on? Between the three of us.

9 >> CONNERY: You didn't give the bathroom breaks.

10 >> HAMILTON: If you have that much deliberation, we can take one.

11 >> ROBERSON: I don't.

12 >> HAMILTON: We're good? Anything you want to talk about?

13 Okay. Well, we'll go to closing remarks, I would like to thank Jim McConnell and Teresa Robbins for  
14 taking the time to come discuss these important issues regarding our shared interests in ensuring public  
15 health and safety at the Pantex Plant. And I'm going to now turn to Ms. Roberson for her closing  
16 remarks.

17 >> ROBERSON: As usual, I thank you both for your support of our relationship, your responsiveness  
18 today, and as we were just at Y-12 out in the field, I appreciate it. I thank you for looking open mindedly  
19 and seriously at what was in the recommendation and what our communications have been back and  
20 forth. We appreciate that. And I have a lot of confidence that you have every commitment that's going  
21 to enhance the mission at Pantex through the activities you take in regard to safety in the future. So  
22 thank you for being here.

23 >> CONNERY: So I would like to echo those comments. Thank you for coming. Thank you for being  
24 willing to engage with us on these topics. I do feel better having heard kind of what's going on behind  
25 the scenes. I feel a little chagrined that the way we find these details out is through a public meeting. I  
26 wish they were better communicated. So we would have those details kind of upfront. I'm very  
27 encouraged by what you said, Ms. Robbins, about NNSA taking this seriously at the Federal level and  
28 having these conversations.

29 I understand the kind of management push for the contractor partner scenario. But the contractors  
30 come and go. And the backbone of the protection of the public health and safety resides with the  
31 Federal workforce. And so it's -- to me, it's your involvement, your personal involvement, your personal  
32 commitment. And it's gratifying to see you have command of the details of your site. We don't always  
33 see that with site managers that come to talk to us about safety bases. Some actually don't know what's  
34 in their safety bases. So I think that's again very gratifying to me and it's encouraging to know that you  
35 are working on these issues and take them seriously and are digging into the details of special tooling  
36 and walking the plant. I think that is to your credit. So I appreciate you both coming today. And we look  
37 forward to the next iteration of the IP.

38 >> HAMILTON: Thank you, Ms. Connery. I think everyone here knows I didn't support the  
39 recommendation. That doesn't mean that I think there's zero risk at the Pantex Plant. The adequate  
40 protection standard was established by Congress without defining it to some objective detail. And they

1 instead provided the Board with different views of -- different views and different backgrounds in order  
2 to come up with a balanced conclusion. But at the end of the day, adequate protection is defined as a  
3 subjective evaluation. The difference that I have between -- the difference that the Board has -- that I  
4 have between this with my other Board Members is not a yes-or-no question. It's a matter of where we  
5 each draw a very subjective line between adequate and inadequate. I happen to draw it in a different  
6 place so I did not support the recommendation. I haven't heard anything that would make me want to  
7 change that view.

8 I put all that -- I put my reasoning for that in my detailed remarks that are associated with the  
9 notational vote that we posted on February 19th so I don't need to repeat them here. But I did have one  
10 thought that I did want to add.

11 I'm a little bit troubled -- and this is -- Jim McConnell, you'll remember from last time we were here.  
12 I made the same comment. I want to make it again. Because it's kind of connecting the dots on multiple  
13 places. And I'm a little bit troubled that we are using a plan to check off complete. And I used this phrase  
14 last time and I'll say it again because I got some good mileage out of it. It's kind of like saying -- saying an  
15 action is complete based on establishing a plan is kind of like saying that I don't have credit card debt  
16 because I have a plan to pay off my credit card debt. It's either a problem or it's been fixed. A plan to fix  
17 it isn't the answer. It may get you to the answer. But it's not there yet.

18 For example, this implementation plan Item 1.7 addressed legacy conditions that are going to  
19 require improvement upgrades. And that was closed based on a plan that's going to go through Fiscal  
20 Year 2024. And who knows what kind of funding challenges we're going to have between now and 2024.  
21 So I wanted to save this until the end because it's really a cross-cutting issue from our last public  
22 meeting where we discussed this same thing. I just offer that for your consideration. Because it's  
23 something that kind of disturbs me.

24 That said, I remain convinced that the safety -- I personally remain convinced that the safety nexus  
25 at the Pantex Plant as it exists today adequately protects the public health and safety. Again, thank you,  
26 Mr. McConnell and Ms. Robbins for being here. I know you don't just roll out of bed one morning and  
27 come and give briefings like this. So I know it took a lot of work and time to do it. So I very much  
28 appreciate it. That concludes my personal remarks.

29 And this concludes the public meeting of the Defense Nuclear Facilities Safety Board. We have  
30 adjourned.