

1625 Eye Street, N.W. Suite 800 Washington, D.C. 20006-4374 P (202) 828-2317 F (202) 828-2488 www.energyca.org

June 2, 2020

Chairman Bruce Hamilton Defense Nuclear Facilities Safety Board 625 Indiana Ave NW Suite 700 Washington, DC 20004

RE: Board Response and Chairman's Comments to ECA Letter Requesting Public Education and Outreach Materials on Recommendation 2020-01

Dear Chairman Hamilton,

On behalf of the Energy Communities Alliance (ECA), I would like to thank you and the Board for taking our comments submitted to you on April 23, 2020 under consideration. However, I was surprised to read your individual comments¹ about whether educating communities on Board Recommendations is a proper use of Board resources.

I would like to first clarify our intentions of <u>our original letter</u>. ECA asked for explanations of the technical components and recommendations delivered by the Board <u>for the communities</u> that would be impacted most directly by the proposed changes. In our letter we requested that DNFSB create "materials **for public education and public outreach** on Recommendation 2020-01 in order **to facilitate community education**."

Local governments and past Board Chairs believe community education on the Board's recommendations would be an appropriate use of federal resources. The Board provides oversight of DOE and NNSA nuclear activities and there is a clear need for the general public – especially those that live and work next to the sites - to understand what the Board is deeming a risk and a priority, and the proposed changes to operations.

Recommendation 2020-01 is a complex document full of technical language and topics. It is also a document that impacts DOE and NNSA sites and therefore local communities. It would be in the best interest for sites and communities to fully comprehended the Board's Recommendation.

The Board should ensure that every communication and recommendation be clearly understood by the parties impacted by the recommendations. If the recommendation is not

¹ Comments provided by Chairman Hamilton: "...using staff resources, even though marginal in this instance, to educate a public interest group on complex technical Recommendations made to the Secretary is outside the Board's mission and is thus an inappropriate use of public resources. Likewise, providing educational services to a public interest group sets a precedent that the Board would be well-served to avoid."

understood, the Board will be discounted as an organization and any challenge by DOE/NNSA would likely be supported locally since the Board recommendation would not be understood.

Hence, we believe it is an appropriate use of funds to communicate clearly the Board's recommendations in a manner that allows the public to understand the recommendations. In fact, several previous Board budget requests have included language that states the budget will be used to communicate with local governments, state governments and the communities around the DOE/NNSA sites.

ECA has enjoyed having a strong working relationship with you and the Board, and we appreciate the opportunity to clarify any misinterpretations of our original letter. Education and communication by the Board to communities are two vital tools that should be supported just as they have been in the past.

ECA welcomes the opportunity to discuss our concerns and ways in which we can help improve communication and engagement between Board and local communities. If you have any questions or concerns on this matter, please contact me.

Sincerely,

County Executive Ron Woody

Rolligary

Roane County, TN ECA Chair

CC: ECA Executive Board

ECA Executive Director Seth Kirshenberg

Board Member Jessie H. Roberson

Board Member Joyce L. Connery