The Honorable Dan Brouillette  
Secretary of Energy  
US Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585-1000

Dear Secretary Brouillette:

We received the National Nuclear Security Administration’s letter dated June 5, 2020, and subsequent briefing on August 4, 2020, regarding the revised implementation plan for Board Recommendation 2019-1, *Uncontrolled Hazard Scenarios and 10 CFR 830 Implementation at the Pantex Plant*. The revised implementation plan addresses the concerns with the original plan that we identified in our October 28, 2019, letter and December 2019 public meeting. We find the revised implementation plan to be responsive and indicative of the Department of Energy’s acceptance of Recommendation 2019-1.

With regard to sub-recommendation three, the Board maintains that—consistent with the hierarchy of controls established in DOE Standard 3009, *Preparation of Nonreactor Nuclear Facility Documented Safety Analysis*—additional engineered controls would prevent human-based operational accidents, such as falling technician and dropped equipment scenarios, more reliably than administrative controls. We advise DOE to consider adding or expanding the use of engineered controls such as transfer carts, where applicable, to allow elimination of both hand lifts of tools and swing arms in tooling.

The frequent and constructive staff-level interactions during the implementation plan revision process greatly facilitated productive discussion and resulted in a product that addressed our safety recommendations. We note such interactions as a best practice and hope to see them become more prevalent in the future, particularly during the development of implementation plans for Board Recommendations.

Yours truly,

Thomas A. Summers  
Acting Chairman

c: The Honorable Lisa E. Gordon-Hagerty  
Mr. Joe Olencz
AFFIRMATION OF BOARD VOTING RECORD

SUBJECT: Response to Revised Recommendation 2019-1 IP

Doc Control#: 2020-200-0008

The Board acted on the above document on 09/03/2020. The document was Approved.

The votes were recorded as:

<table>
<thead>
<tr>
<th>Name</th>
<th>APRVD</th>
<th>DISAPRVD</th>
<th>ABSTAIN</th>
<th>NOT PARTICIPATING</th>
<th>COMMENT</th>
<th>DATE</th>
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<tbody>
<tr>
<td>Bruce Hamilton</td>
<td></td>
<td>✔️</td>
<td></td>
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<td>09/01/2020</td>
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<tr>
<td>Thomas Summers</td>
<td>✔️</td>
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<tr>
<td>Jessie H. Roberson</td>
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<tr>
<td>Joyce L. Connery</td>
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<td></td>
<td></td>
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<td>09/03/2020</td>
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</tbody>
</table>

This Record contains a summary of voting on this matter together with the individual vote sheets, views and comments of the Board Members.

Shelby Qualls
Executive Secretary to the Board

Attachments:

1. Voting Summary
2. Board Member Vote Sheets
FROM: Bruce Hamilton

SUBJECT: Response to Revised Recommendation 2019-1 IP

Doc Control#: 2020-200-0008

DATE: 09/01/2020

VOTE: Disapproved

COMMENTS:
I do not support this correspondence for the reasons articulated in my comments on Doc#2019-200-014.
I therefore disapprove.

Bruce Hamilton
FROM: Thomas Summers

SUBJECT: Response to Revised Recommendation 2019-1 IP

Doc Control#: 2020-200-0008

DATE: 09/03/2020

VOTE: Approved

COMMENTS:
None

Thomas Summers
FROM: Jessie H. Roberson

SUBJECT: Response to Revised Recommendation 2019-1 IP

Doc Control#: 2020-200-0008

DATE: 09/03/2020

VOTE: Approved

Member voted by email.

COMMENTS:

None

Jessie H. Roberson
FROM: Joyce L. Connery

SUBJECT: Response to Revised Recommendation 2019-1 IP

Doc Control#: 2020-200-0008

DATE: 09/03/2020

VOTE: Approved

Member voted by email.

COMMENTS:

None