Delete the following sentences from the letter:

Further, the safety bases rely on a probabilistic analysis that lacks a sufficient technical basis to calculate the frequency of seismically induced fires, which may artificially lower the probability of occurrence. When corrected, the estimated accidental radiological dose consequences and frequency reflected in several safety basis documents could increase significantly and, as a result, may require additional safety-related controls to protect the public or worker. Accordingly, we stress that revisions to these calculations should be completed expeditiously.

**Justification:**

The letter as received in Yellow Folder by the staff is disjointed. The first three sentences say the contractor decided to do a good thing, while the next three (which this amendment would delete) come across as a stern warning. In addition, the last two sentences (“When corrected, … these calculations should be completed expeditiously.”) come pretty close to meeting the requirement for a formal recommendation.

If approved, this amendment leaves in place a straightforward letter asking for the scope and schedule of the review plan. The issues raised in the deleted sentences can be discussed between Board staff and NNSA staff, and a second Board communication could follow if we are unsatisfied.
Lotus Smith

From: Lotus Smith
Sent: Tuesday, March 31, 2015 4:47 PM
To: Steven Stokes; John Batherson; Daniel J. Santos; Jessie Roberson; Sean Sullivan
Cc: Alicia Proctor; Lotus Smith
Subject: RE: Doc#2015-063A Amendment by Board Member, Sean Sullivan to Yellow Folder Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting Safety Bases at the Pantex Plant 24-Hour Review

There are no administrative issues associated with this amendment.

From: Lotus Smith
Sent: Tuesday, March 31, 2015 4:21 PM
To: Steven Stokes; John Batherson; Mark Welch; Daniel J. Santos; Jessie Roberson; Sean Sullivan
Cc: Alicia Proctor; Lotus Smith
Subject: Doc#2015-063A Amendment by Board Member, Sean Sullivan to Yellow Folder Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting Safety Bases at the Pantex Plant 24-Hour Review

TO: Office Directors/Board Members
FROM: Executive Secretary
SUBJECT: Amendment by Board Member, Sean Sullivan to Yellow Folder Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting Safety Bases at the Pantex Plant 24-Hour Review

Doc Control#: 2015-063A

Please be advised that Board Member, Sean Sullivan, has submitted an amendment to Yellow Folder Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting Safety Bases at the Pantex Plant 24-Hour Review.

Attached is the Amendment request and Yellow Folder: Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting Safety Bases at the Pantex 24-Hour Review.

For the purpose of tracking amendments, this document is Doc#2015-063A Amendment by Board Member, Sean Sullivan to Yellow Folder Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting Safety Bases at the Pantex Plant 24-Hour Review.

Office Directors, please respond to this email with your inputs.

REF. Board Procedures;

e) As soon as practicable, the Board Members should receive input from the Office Directors as to whether any technical, legal, or administrative issue is raised by the amendment. The Office Directors should not comment on the writing style or tone of the amendment text, or the underlying policy issues raised by the amendment, unless specifically asked to do so by a Member;

One business day after issue of this amendment, a notational vote ballot will be distributed to Board Members on this amendment.
Reviewed. There are no legal issues presented by the proposed amendment.

From: Lotus Smith  
Sent: Tuesday, March 31, 2015 4:21 PM  
To: Steven Stokes; John Batherson; Mark Welch; Daniel J. Santos; Jessie Roberson; Sean Sullivan  
Cc: Alicia Proctor; Lotus Smith  
Subject: Doc#2015-063A Amendment by Board Member, Sean Sullivan to Yellow Folder Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting Safety Bases at the Pantex Plant 24-Hour Review

TO: Office Directors/Board Members  
FROM: Executive Secretary  
SUBJECT: Amendment by Board Member, Sean Sullivan to Yellow Folder Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting Safety Bases at the Pantex Plant 24-Hour Review

Doc Control#: 2015-063A

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   One business day after issue of this amendment, a notational vote ballot will be distributed to Board Members on this amendment.
OTD has the following concern:

The proposed deletion removes context from the letter such that the recipient will not be able to understand the potential safety issue represented by the conditions at Pantex. Please note, CNS only committed to looking at dispersion, and it is not clear that the review plan would include the frequency calculation, which also needs to be revised. Additionally, absent this explanatory material, the remaining text amounts to effectively an information request, which the staff is empowered to file at the working level (from staff direct to NPO).

Steven A. Stokes  
Technical Director  
Defense Nuclear Facilities Safety Board  
202-694-7143
Dear Administrator Klotz:

The purpose of this letter is to seek information regarding a planned review of the Pantex Plant safety bases by Consolidated Nuclear Security, LLC (CNS). We understand that CNS plans to conduct a comprehensive review of all legacy dispersion calculations that support the Pantex Plant safety bases, including a review of input assumptions, techniques, and calculation methods. We support this effort as many of the existing supporting analyses are outdated and contain radiological dose consequence calculations that use non-conservative assumptions and input parameters that lack technical justification. Further, the safety bases rely on a probabilistic analysis that lacks a sufficient technical basis to calculate the frequency of seismically induced fires, which may artificially lower the probability of occurrence. When corrected, the estimated accidental radiological dose consequences and frequency reflected in several safety basis documents could increase significantly and, as a result, may require additional safety-related controls to protect the public or worker. Accordingly, revisions to these calculations should be completed expeditiously.

Pursuant to 42 U.S.C. § 2286b(d), the Board requests a report within 90 days from receipt of this letter that contains the review plan, including scope and schedule, for identifying and updating potentially deficient calculations that support the Pantex Plant safety bases.

Sincerely,

Jessie H. Roberson
Vice Chairman

c: Mr. Matthew B. Moury
Mr. Steven C. Erhart
Mr. Joe Olencz
## TECHNICAL STAFF CONCURRENCE/RECORD NOTE PAGE

### SUBJECT:
Review of Atmospheric Dispersion Methodologies Supporting Safety Bases at the Pantex Plant

### AUTHOR:
M. Dunlevy

### REPORT:
Board Letter

### AFFECTED SITES:
Pantex

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<td>M. Dunlevy</td>
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**Project Leader(s)/Cognizant Engineer(s):**

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### STAFF RECORD NOTES

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1. To Technical Editor:

2. Submitted for classification review on:

3. DOE classification review completed on:

4. Author agrees that document is ready for the Board:

5. Copies provided to the Board members:

**Record Note:**

**DNFSB STRATEGIC PLAN REFERENCE NUMBER**

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<th>SECRETARY'S LAST NAME</th>
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FILE NAME: \HOME\TRANSFEROTD\LETTERS\NWP\FY15\BL.FY15.NWP.PANTEX DISPERSION.R0.DOCX
RECORDS CONCURRENCE FORM

NUMBER FY2015-

SUBJECT Review of Atmospheric Dispersion Methodologies Supporting Safety Bases at the Pantex Plant

GROUP LEADER CONCURRENCE (Signature and Date)

DNFSB STRATEGIC ACTION PLAN REFERENCE:

TECHNICAL CONCURRENCE

TECHNICAL EDITOR
NAME: D. CAMPBELL
INITIALS: 
DATE: 

TECHNICAL DIRECTOR
NAME: S.A. STOKES
INITIALS: 
DATE: 

GENERAL MANAGER CONCURRENCE

GENERAL MANAGER
NAME: M. T. WELCH
INITIALS: 
DATE: 

LEGAL CONCURRENCE

ACTING GENERAL COUNSEL
NAME: R. N. REBACK
INITIALS: 
DATE: 

DEPUTY TECHNICAL DIRECTOR FOR SITE REPS

NAME: R.E. TONTODONATO
INITIALS: 
DATE: 

BOARD BRIEFING BRIEF TO BOARD MEMBERS

NAME: S.A. STOKES
INITIALS: 
DATE: 

CLASSIFICATION CHECK

DNFSB SECURITY MICHAEL LEGGETT

DOCUMENT #1 DOCUMENT #2 DOCUMENT #3
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BOARD MEMBERS (5), W/ ENCLOSURE
OGC, W/ ENCLOSURE
OGM, W/ ENCLOSURE
OTD, W/ ENCLOSURE
SITE REPS, W/ ENCLOSURE (EMAIL)
ARCHIVES/CHRON., (2), W/ ENCLOSURE
LOG KEEPER, W/ ENCLOSURE

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SECRETARY/AUTHOR Fleet/Dunlevy

RELEASED FOR DISTRIBUTION ON
AFFIRMATION OF BOARD VOTING RECORD

SUBJECT: Amendment by Board Member, Sean Sullivan to Yellow Folder Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting Safety Bases at the Pantex Plant 24-Hour Review

Doc Control#2015-063A

The Board, with Board Member(s) Sean Sullivan, Daniel J. Santos approving, Board Member(s) Jessie H. Roberson disapproving, Board Member(s) none abstaining, and Board Member(s) none recusing, have voted to approve the above document on April 2, 2015.

The votes were recorded as:

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*Reason for “No Vote

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

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: Jessie H. Roberson

SUBJECT: Amendment by Board Member, Sean Sullivan to Yellow Folder Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting Safety Bases at the Pantex Plant

Doc Control#2015-063A

Approved_____ Disapproved X Abstain_____

Recusal – Not Participating_____

COMMENTS: Below____ Attached____ None____

Jessie H. Roberson

Date 4/2/2015
DEFENSE NUCLEAR FACILITIES SAFETY BOARD

NOTATIONAL VOTE RESPONSE SHEET

FROM: Sean Sullivan

SUBJECT: Amendment by Board Member, Sean Sullivan to Yellow Folder Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting Safety Bases at the Pantex Plant

Doc Control#2015-063A

Approved ☑ Disapproved _____ Abstain _____
Recusal – Not Participating _____

COMMENTS: Below ☑ Attached _____ None _____

See the justification, attached.
From: Alicia Proctor
Sent: 4/2/2015 8:20 AM
To: Jessie Roberson; Sean Sullivan; Daniel J. Santos
Cc: Alicia Proctor; Lotus Smith
Subject: Notational Vote: Doc#2015-63A Amendment by Board Member, Sean Sullivan to Yellow Folder Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting safety Bases at the Pantex Plant

This email is an electronic record of Notational Vote. Voting ballot will follow shortly. Also, accepting electronic votes.

DEFENSE NUCLEAR FACILITIES SAFETY BOARD
NOTATIONAL VOTE RESPONSE SHEET

FROM: Members of the Board
SUBJECT: Amendment by Board Member, Sean Sullivan to Yellow Folder Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting safety Bases at the Pantex Plant

DOC# 2015-63A Amendment by Board Member, Sean Sullivan to Yellow Folder Doc#2015-063 Review of Atmospheric Dispersion Methodologies Supporting safety Bases at the Pantex Plant

All Office Directors have provided their inputs.

Approved____
Disapproved____
Abstain____
Recusal – Not Participating____

COMMENTS:
Below____
Attached____
None____

Alicia Proctor
Executive Assistant
Office of the Chairman
Defense Nuclear Facilities Safety Board
625 Indiana Ave, NW, STE 700
Washington, DC 20004