



Chemical Safety and Hazard Investigation Board

Office of General Counsel

Memorandum

To: Board Members

From: Richard C. Loeb *RC*

Cc: Leadership Team

Subject: Board Action Report – Notation Item 13-06

Date: November 2, 2012

On November 1, 2012, Notation Item 13-06 was calendared. This item proposed the adoption of a revised version of Board Order 22, *CSB Recommendations Program*, which would replace the version of Order 22 currently in effect. Explanatory comments submitted by Member Griffon with his vote are attached to this memorandum.

Voting Summary – Notation Item 13-06

Disposition: CALENDARED

Disposition date: November 1, 2012

	Approve	Disapprove	Calendar	Not Participating	Date
R. Moure-Eraso	X				10/18/2012
M. Griffon			X		11/1/2012

Mark Griffon Comments related to Notation Item 13-06

I am voting to calendar notation item number 13-06 to have a discussion and vote on the proposed change to Board Order 22 during a public meeting. This is a board order which will certainly be of interest to the public since it outlines the agency's process for developing and evaluating recommendations and therefore I feel that it should be discussed in a public meeting. I have some questions related to the recommendation status categories (section 7. h), the status change summary document (section 7.g (3)(d)), public availability of recommendations information (section 11) and Board interactions (section 12). Of particular concern is section 11.b which, if adopted, will have the effect of having the Board vote on recommendation status change primarily by a notation voting process. I believe that the Board should make all attempts to conduct this business in public and that the use of notation voting should be the exception rather than the rule. Establishing regular public Board meetings would allow for these recommendation status change votes to be done efficiently and in a very transparent manner. I look forward to discussing the proposed board order in a public meeting.

Mark A. Griffon

11/1/12