BWXT Response to Additional Questions from the Public Regarding Rezoning of BWXT Land

Feb. 18, 2026

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1. **Need for Additional Rezoning**

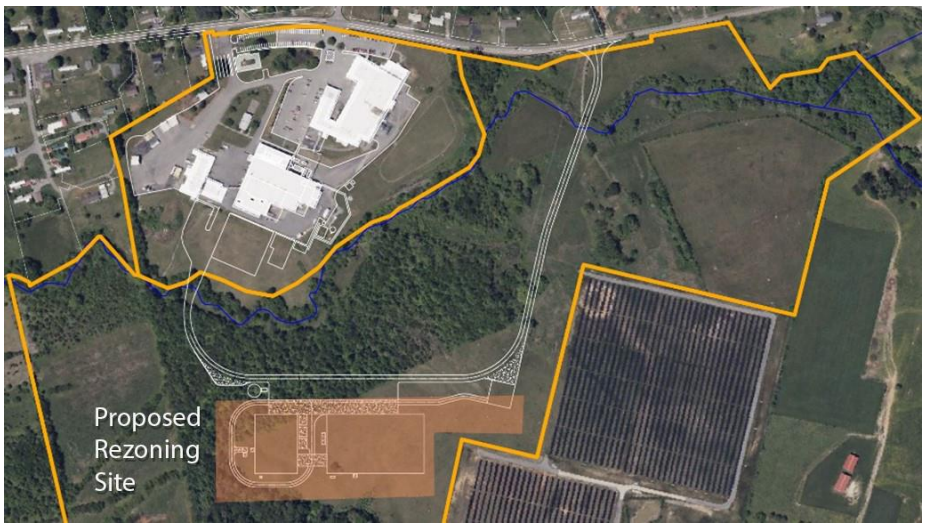
BWXT has stated publicly that it can fulfill its current government contract within its existing M-2-zoned footprint. If that is the case, please explain clearly and specifically why additional rezoning is necessary at all. What activities, uses, or capacities would be enabled by rezoning that are not required to meet the current contract?

The request for additional rezoning is driven by land-use optimization and community considerations. The area proposed for rezoning provides materially better siting characteristics:

- The new facilities in the rezoned area are located farther back from public roadways, significantly reducing visibility of industrial facilities due to existing tree coverage at the rear of the property and area topography.
- The new facilities are bordered on one side by a solar farm' on the front by existing industrial facilities, and on the rear by topography. creating a natural buffer to residential areas.
- The location for the new facilities allows for a more efficient internal transportation layout, including improved traffic flow and separation of inbound and outbound movements.
- Regardless, all facilities will be located outside of the designated flood plain.

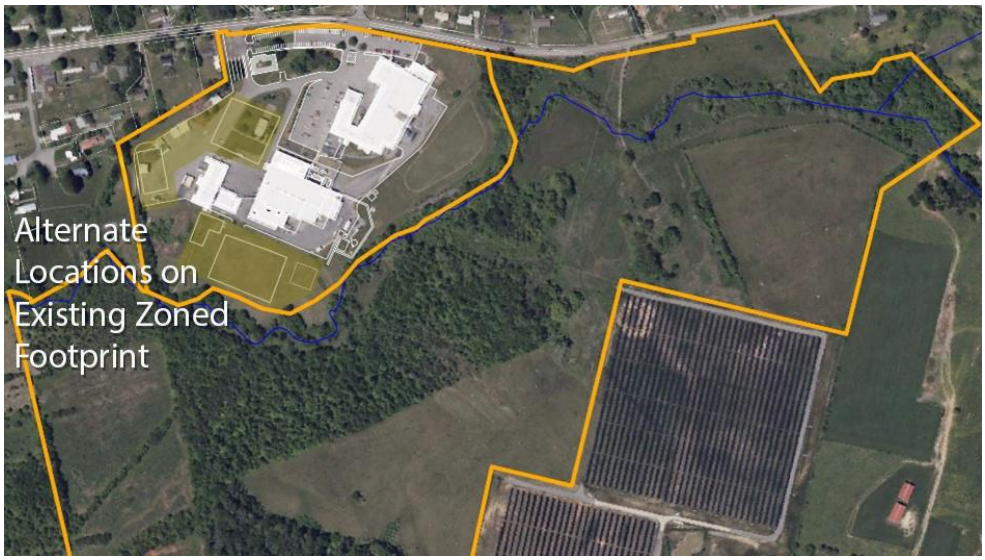
The features offered by the rezoned area reduce visual impact, improve buffers and better align the project with surrounding land uses.

For reference, the map provided for the proposed expansion into the rezone area displays these characteristics visually:



While the existing M-2 area is suited for the scope's processes and can fulfill the current government contract, it requires certain site related trade-offs from a site planning perspective. The area contains closely spaced buildings, limited room for additional setbacks and closer proximity to adjacent properties, which constrains layout flexibility and buffer distances. If the rezoning decision is not approved, BWXT will proceed with the expansion within the existing M-2 area and will apply the same rigor for safety and regulatory compliance. All environmental assessments are also still required before proceeding, per NNSA direction.

To visualize the siting characteristics for new HPDU facilities being located on the current M-2 area, BWXT has developed an alternate plan map:

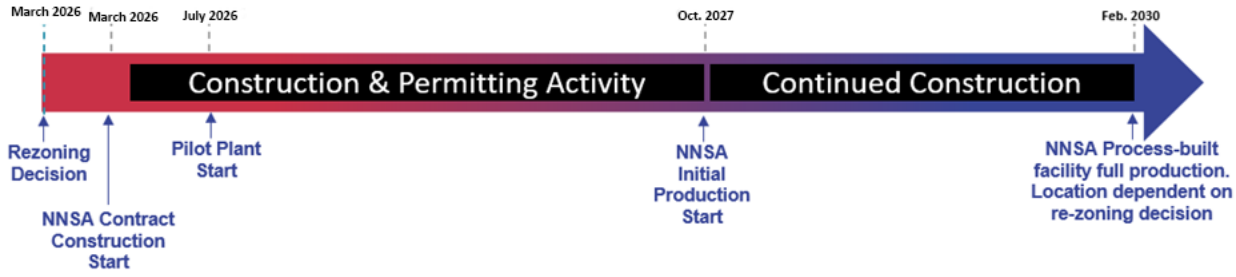


In comparison to the existing M-2 area expansion, the proposed rezoned area expansion allows facilities to be sited with greater separation from neighboring properties, improved circulation and reduced external impacts. From a land-use standpoint, this makes the rezoned area the optimal location, even though it is not required to meet the current contract. These considerations formed a key part of the Washington County Planning Office's recommendation to approve the rezoning, independent of contract scope, capacity or regulatory requirements.

As a reminder, BWXT will begin producing HPDU within the current M-2 zone by the end of 2026 under the current contract for the pilot production plant by utilizing existing facilities, consistent with the existing zoning. By the end of 2027, BWXT will expand the capacity of HPDU production within existing facilities and existing zoning

to produce 150 MT of HPDU metal on an annual basis. BWXT will then begin production in new process-built facilities (meaning HPDU specific) by early 2030 for long-term production. The rezoning vote will determine where BWXT locates process-built facilities and will shape the approval processes for the new process-built facilities. BWXT must receive construction and disturbance permits prior to the start of any construction activities. For all existing and new facilities, operations may only commence after completion of all required permitting, licensing and environmental assessment activities, including applicable federal and state reviews.

A visual timeline of BWXT's planned expansion and production schedule is provided for clarity:



To further reiterate, there are no activities, uses or capacities that are enabled by rezoning that are required to meet the current contract. The rezoning request reflects long-term land-use planning and buffer optimization with the community in mind.

2. **Truck Traffic Inconsistencies**

In Section IV, BWXT states that hazardous-material shipments will average approximately 1.6 truck trips per operating day, while elsewhere stating that total logistics will add approximately four truck trips per operating day when fully operational. Please reconcile these figures by explaining precisely which inbound and outbound shipments are included in each number and clarify why materially different daily truck volumes are presented without explanation in the same response document.

The two figures address different components of truck traffic, which is why they differ. The estimate of approximately 1.6 truck trips per operating day reflects only shipments involving hazardous materials, whether inbound (reagents and oxide feedstock) or outbound (HPDU metal and solidified waste). The estimate of approximately four truck trips per operating day represents the total incremental logistics impact, including both hazardous-material shipments and non-hazardous deliveries such as general supplies and routine operational support. All shipment values provided were conservative estimates, intentionally structured to represent upper-bound averages rather than typical daily activity. When read together, these figures show that hazardous-material shipments are a subset of overall truck traffic, not a separate or conflicting estimate.

BWXT has also been working diligently to incorporate additional design improvements as the project has matured. One such improvement is a waste-processing enhancement that reduces the volume of waste material due to recycling throughout the processing system. Because all process waste is solidified and shipped off-site, this improvement has now been incorporated into the design and is expected to further reduce waste volumes, which in turn will reduce both the conservative average of hazardous-material shipments and the total number of truck trips associated with operations. This enhancement demonstrates BWXT's commitment to environmental sustainability, even though it represents an up-front cost incurred by BWXT rather than a regulatory or contract requirement.

3. **Economic Impact Methodology**

BWXT cites approximately 190 jobs by 2027 and additional positions thereafter but provides limited detail on economic multipliers or public costs. Please provide the economic-impact methodology used to estimate net benefits, including assumptions regarding local hiring rates, wage levels, public-service costs, and infrastructure impacts.

BWXT did not perform a standalone economic-impact study using formal multiplier modeling, as such studies are not required to support a rezoning decision and are typically commissioned by public agencies rather than private applicants. Instead, BWXT's assessment of economic benefit is based on direct employment, wage quality and local sourcing, which are the most relevant and reliable indicators at the zoning stage. The job figures provided, with approximately 190 positions by 2027 and additional positions in following years reflect direct, permanent employment

associated with operations, not temporary construction labor or speculative secondary impacts. As previously stated, a vast majority of these positions will be filled by the local workforce.

With respect to wages, the positions associated with the HPDU project are expected to be substantially above the Washington County average. For context, the Tennessee statewide average annual wage exceeds the Washington County average, and BWXT's anticipated wage levels are expected to be above the statewide average, reflecting the technical, operational, safety and quality requirements of the work. These higher-wage positions generate indirect economic benefit through increased household spending, local tax contributions and demand for local services, without requiring the County to assume additional public-service or infrastructure costs beyond what is already planned or able to be managed through existing mechanisms. Infrastructure impacts, such as roadway improvements, are addressed through established state and local processes and are not a function of the rezoning itself, further supporting the conclusion that the rezoning enables net local economic benefit without imposing new public financial burdens. Further, BWXT has not requested any financial incentives, subsidies or direct funding from Washington County in connection with this project.

4. **Proximity to Sensitive Receptors**

BWXT discusses dose limits and localized impacts but does not identify receptor distances. Please provide the distances from the proposed production facilities and stacks to the nearest residences, schools, and other sensitive receptors used in any preliminary internal evaluations.

Detailed receptor-based modeling is performed as part of the formal permitting, licensing and National Environmental Policy Act (NEPA) processes, not at the rezoning stage. Those regulatory evaluations define receptors, distances, exposure pathways and modeling assumptions in accordance with applicable federal and state guidance and are subject to agency review and approval.

BWXT has previously outlined the design criteria and inherent safety systems that will be utilized, including negative-pressure enclosures, multi-stage filtration and continuous monitoring of stacks and measuring stations. Any potential releases are expected to be extremely limited in magnitude, on the order of grams per year. These conservative design assumptions are integral to the permitting basis and will

be verified and enforced through the applicable regulatory approvals prior to operation, not as a function of land-use determination.

The proposed production facilities and associated stacks in the proposed rezone area will be located within the existing BWXT property and are separated from surrounding residential and institutional uses by significant distances and natural buffers. There are no schools or similar sensitive receptors located immediately adjacent to the production areas and the nearest residences are well distanced from the footprint planned in the rezoned option, with distances measured in hundreds to thousands of feet, depending on direction and receptor type. These separations were a key consideration in site selection and layout and are further enhanced by internal setbacks, vegetation, and controlled access. Additionally, both siting options presented by BWXT satisfy applicable land-use compatibility, however, the rezone option provides the greatest separation between production facilities and adjacent properties, further enhancing buffering.

Definitive receptor distances and any associated dose or dispersion evaluations will be established and documented through the required air permitting, radiological licensing and NEPA environmental review, using conservative assumptions and regulator-approved methodologies. Those analyses, not zoning submissions, are the appropriate and legally required mechanisms for evaluating localized impacts to residences, schools and other sensitive receptors.

5. **Emissions Conclusions Without Modeling**

BWXT states that all uranium compounds combined are expected to be measurable on a gram basis for a given year of production, while also stating that no air dispersion or dose modeling has been performed for the HPDU production process. Please explain how a gram-level emissions conclusion was reached in the absence of any project-specific dispersion or dose modeling for the production-scale process.

BWXT has explained in prior responses that the gram-level estimate for combined uranium compound emissions is a source estimate derived from process design, not from air dispersion or dose modeling. These are two different analytical steps that occur at different points in the regulatory process. The gram-level conclusion is based on conservative mass-balance calculations, well-established material handling assumptions and the design engineered capture efficiencies of the HPDU

process, including negative-pressure containment, local exhaust ventilation, multi-stage filtration and high-efficiency HEPA systems.

As BWXT has already noted, project-specific air dispersion and dose modeling will be conducted as part of the required permitting, licensing and NEPA environmental review processes, where regulator-approved methodologies will be applied to confirm compliance with applicable standards. The absence of completed dispersion modeling at this stage does not undermine the gram-level estimate, rather, it reflects the appropriate sequencing of engineering design, source-term definition and regulatory impact analysis. Although detailed NEPA and permitting processes will provide final conclusions towards air dispersion, preliminary design-based evaluations indicate that both siting options are protective, with the rezoned option providing greater separation distances that would further support conservative dispersion assumptions.

6. **Child Cancer Risk Analysis**

BWXT states that ATSDR screening tools are intentionally conservative while also stating that quantitative, child-protective risk evaluations are appropriately conducted through formal environmental review and permitting. Please explain how BWXT can dismiss or minimize child cancer risk calculations while simultaneously acknowledging that no project-specific child-protective risk evaluation has yet been conducted for this project.

BWXT is not dismissing or minimizing child cancer risk, nor has BWXT suggested that child-protective evaluations are unnecessary. As explained in prior responses, the distinction is between screening tools and formal risk assessments, which serve different purposes and occur at different stages of the regulatory process. ATSDR screening tools are intentionally conservative by design and are intended to flag situations that may warrant further study by assuming continuous, long-term exposure, 100% bioavailability, worst-case intake rates and the absence of emission controls. These assumptions are appropriate for preliminary public-health screening, but they are not suitable for evaluating a controlled, permitted industrial facility with engineered containment and regulatory oversight.

BWXT has consistently stated that quantitative cancer-risk evaluations, including child-protective analyses, are appropriately conducted through formal environmental review and permitting, where regulator-approved methodologies,

site-specific data and conservative exposure scenarios are applied to all potentially exposed populations, including children. In prior responses, BWXT addressed cancer risk in terms of total public exposure, which is the standard regulatory approach and inherently includes sensitive subpopulations. There is no separate dismissal of child risk, rather, BWXT has emphasized that credible risk conclusions must be based on project-specific modeling and regulatory analysis, not on generalized screening calculations that intentionally overstate risk.

The repeated framing of this issue as a uniquely "child cancer risk" concern, absent project-specific data and outside the formal regulatory process, does not reflect how health-risk assessments are conducted and reviewed by regulators. While concern for children is entirely appropriate, isolating one subpopulation in advance of required analyses is a rhetorical tactic, not a scientific conclusion. BWXT's position remains that protective risks will be fully and conservatively evaluated for all populations through the same formal permitting and environmental review processes that govern all public health protections and those processes, not preliminary screening tools, are the appropriate basis for risk determination.

7. **Executive Confidence and Family Proximity**

BWXT states that anticipated emissions, health risks, and safety impacts will be negligible and well below regulatory thresholds. Given these assurances, how close would BWXT's leadership personally feel comfortable living to the proposed facilities with their own children, assuming typical residential exposure patterns over many years? Please explain how that distance aligns with BWXT's confidence in the project's safety representations.

Safety determinations are made through objective, regulator-approved analyses, not personal hypotheticals. That said, BWXT leadership is comfortable living near these facilities with their families, based on the technical understanding of the design, controls and regulatory oversight that governs the project. This confidence is not symbolic, it reflects the fact that BWXT's safety evaluations are grounded in conservative engineering assumptions, multiple layers of containment and enforceable regulatory limits designed to be protective of long-term residential exposure, including for children. Throughout BWXT's operations across the United States, company leadership lives in the communities and localized areas in which BWXT operating facilities are located.

More broadly, BWXT employees at all levels already live in the communities where they work, including near regulated industrial and nuclear-related facilities across the country. This is no different in Washington County. BWXT's confidence in the project's safety is rooted in measured source terms, stringent emission controls and independent regulatory review, not personal assurances. Living proximity is consistent with, not separate from, the company's safety representations, which are validated through permitting, monitoring and oversight rather than subjective judgment.

8. **Community Benefit and Good-Faith Investment**

Given the level of community concern expressed in public meetings and written submissions, what specific, voluntary community-benefit commitments does BWXT envision undertaking to meaningfully invest in and build trust with the local community beyond minimum regulatory requirements? Please describe any programs, initiatives, or binding long-term commitments contemplated or done by BWXT at other facilities.

BWXT has a long history of being an engaged member of the local community in the Tri-Cities as well as at other manufacturing sites. Contributions and involvement include United Way, Days of Volunteering, STEM speakers for schools and other contributions and volunteer activities.

BWXT understands the desire for tangible community benefit, and we intend to continue engaging in that spirit, however, "binding" commitments offered as a condition of rezoning are not appropriate because they risk creating improper conditional or contract-zoning dynamics and can undermine the legal integrity of a land-use decision. In addition, BWXT has already undertaken substantial efforts to meet with community members, answer questions publicly and in writing, and explain the underlying scientific, engineering and regulatory bases for the project in order to directly address a significant number of identified community concerns.

BWXT's approach is to build trust through ongoing, voluntary community investment and transparent performance under the established regulatory framework. These efforts will be performed directly with the Washington County municipal government, the public and the responsible regulatory agencies to demonstrate the effectiveness of BWXT's design basis, construction approach and production plans.

BWXT also publicly documents broader community investment efforts, such as STEM and workforce initiatives, through its published community impact reporting. In Washington County specifically, BWXT's focus is to continue this model through:

- Emphasizing local hiring and workforce development
- Support of local emergency preparedness resources (training and equipment)
- Sustaining two-way community engagement
- Demonstrating robust compliance through permitting, licensing, monitoring, and oversight for the project

These efforts are taking place independently from the rezoning process, with the objective of serving the Washington County community and avoid turning the rezoning decision into a negotiation over commitments that are outside the land-use criteria.

9. **Readiness, Completeness, and Sequencing**

Across your responses, BWXT provides firm assurances regarding safety, emissions, health impacts, traffic levels, flood resilience, and community compatibility, while also stating that key analyses will be completed later through NEPA and permitting. This feels somewhat contradictory as the studies haven't been done yet. Please explain how BWXT reconciles offering confident conclusions at this stage while acknowledging that many technical studies needed to substantiate those conclusions have not yet been performed, and why rezoning is appropriate prior to completion of those analyses.

There is no contradiction between BWXT's confidence at this stage and the fact that project-specific technical analyses by regulatory agencies will be completed through NEPA and permitting stages. The confidence expressed in BWXT's responses is grounded in design-basis decisions, established engineering standards and regulatory frameworks that precede detailed modeling, not in the results of studies that have yet to be performed. At this stage, BWXT is addressing the question that zoning is intended to answer, whether the proposed use is appropriate for the location, based on known factors such as existing industrial use, site configuration, buffering, transportation access, flood avoidance and compatibility with surrounding land uses.

NEPA and permitting analyses are not exploratory exercises to determine whether a project might be safe. These analyses are structured evaluations that apply

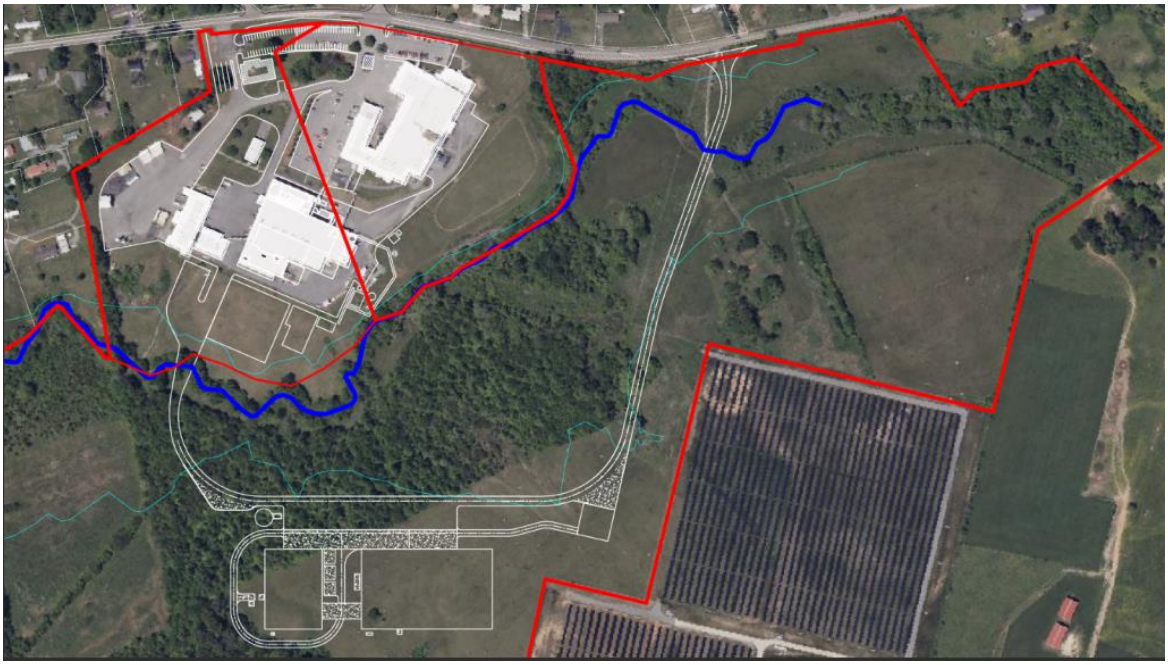
regulator-approved methods to a defined design to verify compliance with established standards. BWXT's statements regarding emissions, safety, traffic and health impacts are design-basis conclusions, derived from conservative assumptions, inherent safety systems, prior experience with comparable regulated operations and BWXT's experience-based confidence that these regulatory requirements are achievable. Detailed modeling is the next step in the regulatory sequence and is intended to confirm, under agency oversight, that those conservative design assumptions meet or exceed applicable requirements. Rezoning appropriately occurs before NEPA and permitting because zoning does not authorize construction or operation, it simply establishes that the use is permissible on the property. If rezoning were deferred until every technical study was complete, it would invert the regulatory process and require applicants to undertake costly, project-specific analyses without knowing whether the land use is allowed. This is why zoning decisions nationwide are based on land-use criteria and planning considerations, while environmental and technical studies follow. In this case, the Washington County Regional Planning Office staff recognized that distinction and recommended approval, concluding that the proposed use is compatible with the site, independent of the subsequent analyses that will be required before any production may proceed.

10. **Floodplain Characterization and Flood Risk**

On page 4 of the Community Questions and Answers document, BWXT states: "Utilizing either option places all buildings outside of the 500-year FEMA flood zone." However, the Washington County Flood Resolution defines Zone A as a "Special Flood Hazard Area" subject to "a one percent or greater chance of flooding in any given year"—commonly known as the 100-year floodplain, not the 500-year floodplain. A 500-year flood zone represents a 0.2% annual chance of flooding, while the 100-year flood zone represents a 1% annual chance—a five-fold difference in flood frequency and risk.

Please confirm whether BWXT's facilities would be located within FEMA Zone A (100-year floodplain), correct the characterization of flood risk in your public materials, and explain how BWXT reconciles minimizing this significant flood hazard while simultaneously claiming the rezoning enables superior site planning and community protection.

Early public comments asserted that BWXT's proposed facilities would be located within flood zones, a claim that is factually incorrect and has contributed to ongoing misinformation. All proposed BWXT facilities, under both the rezoning scenario and the alternate siting option within the existing M-2 area, are located outside of any FEMA-mapped flood zones, including FEMA Zone A (Special Flood Hazard Areas) and mapped floodways. BWXT agrees that the only flood plain associated with the site is a 100-year flood zone.



Note: aqua blue line represents FEMA floodplain boundary; deep blue line is Little Limestone Creek

Once it was made clear all building construction in either siting scenario would take place outside of any flood zone, subsequent assertions claimed the facilities would be *near* flood zones. Proximity to a mapped floodplain, however, is not a land-use deficiency and it is a common condition addressed through standard siting, elevation, drainage and stormwater design practices. From a land-use and design-basis perspective, BWXT intentionally selected building locations on portions of the property which allow for facilities to be placed outside mapped flood-hazard areas while maintaining appropriate setbacks and drainage controls. This approach is consistent with accepted land-use planning practice and local floodplain management requirements.

Importantly, the rezoned area provides optimal flexibility to achieve these outcomes compared to the existing M-2 footprint, enabling greater separation from flood-constrained areas, increased setbacks and improved internal circulation and drainage design. Regardless of these differences, both siting options meet the same fundamental land-use criterion with all facilities being located outside mapped flood zones. The rezoning request does not introduce new flood risk, rather, it enables more optimal site planning and buffering, which was a key basis for the Washington County Planning Office's recommendation. Final confirmation of floodplain compliance, drainage and stormwater controls will be addressed through the required permitting and environmental review processes, but the underlying siting decision, which is to keep all facilities outside mapped flood zones, has been clearly established under both scenarios.

11. Safety as a Core Land-Use Criterion

Throughout your responses, BWXT repeatedly states that safety concerns are "not appropriate within the context of a local rezoning decision" (page 43), that "rezoning is fundamentally a land-use determination" rather than "a referendum on operational safety" (page 48), and that "the rezoning decision should remain focused on lawful land-use criteria" (pages 43, 44, 51).

However, Article I of the Washington County Zoning Resolution explicitly states that zoning exists "For the purpose of promoting the public health, safety, morals, convenience, order, prosperity, or general welfare of Washington County, Tennessee, and to lessen congestion in the streets, to secure safety from fire, flood, panic and other dangers." Similarly, the County's Flood Resolution states its purpose is "to promote the public health, safety and general welfare" and Section 619.5.3 authorizes the Planning Commission to require additional setbacks "in order to protect the health, safety and welfare of the residents of Washington County."

The Commission cannot lawfully make a land-use determination while categorically excluding the safety considerations that Washington County law identifies as zoning's foundational purpose. Please explain how BWXT reconciles its position that operational safety concerns are outside the scope of "lawful land-use criteria" when Washington County's own Zoning Resolution explicitly identifies public safety—including "safety from fire, flood, panic and other dangers"—as the primary statutory purpose of land-use regulation.

BWXT does not dispute that public health, safety and general welfare are foundational purposes of zoning, as reflected in the Washington County Zoning Resolution. The distinction BWXT has consistently drawn and is clarifying in this response, is not whether safety is relevant, but which categories of safety are appropriately evaluated through zoning versus those governed by specialized regulatory regimes.

Local zoning appropriately considers land-use safety characteristics, including:

- Transportation access and circulation
- Area congestion
- Emergency access
- Buffering from adjacent uses
- Floodplain avoidance
- Setbacks
- Overall site configuration

BWXT has directly addressed these zoning-level safety considerations through its site planning. The proposed rezoned area allows for improved:

- Internal traffic flow
- Separation of inbound and outbound truck movements
- Reduced interaction with public roadways
- Safer access for emergency responders

The site layout provides:

- Greater setbacks from roads and neighboring properties
- Enhanced visibility control
- Placement of buildings outside mapped flood-hazard areas.

BWXT has also committed to coordination with local emergency services, including training and preparedness activities, which aligns with zoning's purpose of securing safety from fire, panic and other land-use-related hazards. These considerations were central to the Washington County Planning Office's staff recommendation to approve the rezoning.

By contrast, operational safety matters, such as emissions controls, radiation dose assessments, chemical process safety and detailed fire-suppression system performance, are governed by state and federal permitting, licensing and environmental review processes specifically designed to evaluate those risks using technical expertise and enforceable standards. Acknowledging this division of authority does not exclude safety from zoning, rather, it ensures that each level of government addresses safety within the scope of its lawful jurisdiction, avoiding duplication and regulatory overreach.

As the Washington County Zoning Resolution Article I outlines, a purpose of zoning is to promote prosperity and general welfare, and BWXT has addressed those considerations as well. The project brings approximately 190 high-quality jobs by 2027, with wages expected to exceed both Washington County and statewide averages, supporting long-term economic stability. The use of local contractors, workforce development partnerships and increased economic activity contributes to the County's tax base and local commerce without imposing new infrastructure or public-service burdens beyond those managed through existing processes.

Viewed holistically, BWXT's rezoning request aligns with the Zoning Resolution's objectives by enhancing land-use safety, supporting emergency readiness, improving transportation efficiency and contributing to the economic prosperity of Washington County, while leaving detailed operational safety determinations to the regulatory bodies specifically charged with that responsibility.

12. **"Same Thing AOT Has Always Done" - Scope Definition & Safety Communication**

We're seeking clarification on BWXT's characterization of HPDU operations as "the same thing that AOT has always done" - a phrase that appears frequently in BWXT's safety discussions and public communications.

BWXT's technical explanation regarding NAICS code 325180 reveals this phrase has a much narrower meaning than it conveys to the public. BWXT explicitly states: "BWXT's public statements that this work is 'the same thing that AOT has always done' refer to the core mission and end product, not to an assertion that every upstream process step is unchanged." BWXT then acknowledges that "the current HPDU project expands and modernizes the upstream processing steps" by adding "conversion and purification steps associated with producing

high purity depleted uranium compounds" that align with a new industrial classification: Basic Inorganic Chemical Manufacturing (NAICS 325180).

BWXT's own definition makes clear that "same thing" refers only to the end product being the same. It explicitly does not mean:

- **The same processes**
- **The same chemicals**
- **The same operations**
- **The same hazard profiles**

The distinction matters significantly for safety evaluation:

- **Historical operations: Metal reduction (50+ year track record at this site)**
- **New operations: Chemical conversion and purification (never performed at production scale here, or anywhere else)**
- **New hazards: HF handling, chemical processing (different from historical metal reduction)**
- **New classification: Basic Inorganic Chemical Manufacturing (NAICS 325180)**

By BWXT's own definition, the processes are new, the chemicals are different, and the industrial classification has changed. Only the end product remains the same.

Throughout its history, the site has produced depleted uranium metal for national security purposes.

Importantly, the premise in the question that chemical conversion and purification steps have never been performed at the Jonesborough site is incorrect. The site historically produced uranium tetrafluoride (UF_4) from uranium hexafluoride (UF_6) through the early 1980s as part of the depleted uranium metal production pathway. This fact directly contradicts the assertion that these types of chemical operations are entirely new to the site.

What people should know is that BWXT has intentionally chosen not to process UF_6 as part of the current HPDU project, opting instead to utilize oxide feedstock. This decision was made out of an abundance of caution and reflects the application of modern risk-reduction principles to process design. By selecting oxide feedstock, BWXT avoids reintroducing upstream hazards associated with UF_6 handling while

still achieving the required end product. This approach demonstrates how the project builds on historical capability while deliberately reducing potential risk relative to past operations.

More broadly, chemical conversion, purification and hydrogen fluoride handling are well-established industrial activities that occur safely every day across the United States in regulated chemical, nuclear and manufacturing facilities. These are not experimental processes. The current HPDU project modernizes and integrates upstream steps to meet today's quality, safety and regulatory standards and therefore aligns with the NAICS classification for Basic Inorganic Chemical Manufacturing. The decision to expand these capabilities at the Jonesborough site reflects confidence in the site's safety culture and in the local workforce's demonstrated ability to perform complex, highly regulated operations in support of national security, with safety addressed through conservative design, permitting and oversight.

Please address the following:

a. **Public Understanding vs. Technical Definition: How does BWXT reconcile using a phrase defined to mean only "same end product" in response to operational safety questions, when the reasonable public interpretation is "the same proven safe processes"?**

BWXT has been transparent that the current HPDU project modernizes and integrates upstream chemical processing steps to meet today's quality, safety and regulatory requirements, and has deliberately chosen process configurations, such as the use of oxide feedstock rather than UF_6, to reduce risk relative to past operations.

With respect to operational safety, BWXT has addressed those questions directly and substantively in its responses by describing the design basis, engineered controls, hazard mitigation strategies and regulatory oversight that apply to the HPDU process. Those explanations are provided to inform the public and to address understandable concerns, however, they are not the basis for a local rezoning determination. Zoning evaluates whether industrial use is appropriate for a particular location based on land-use compatibility, buffering, access, flood avoidance and similar planning criteria. Detailed judgments about whether a process is "proven safe" are made through permitting, licensing and environmental review, where regulators assess operational safety using established technical standards.

In short, BWXT reconciles this question by being clear that *maintaining a consistent purpose does not imply that the process must remain the same*, and by ensuring that operational safety questions are answered through the proper regulatory channels designed to evaluate them. Providing that information to the public does not transform those operational considerations into land-use criteria, nor does it diminish the role of zoning as a threshold determination focused on site suitability rather than process-level safety certification.

b. Safety Record Transferability: Since BWXT has clarified that upstream processes are being "expanded and modernized" with new conversion and purification steps, please explain why historical metal reduction safety records should provide assurance about new chemical manufacturing processes that have a different industrial classification and different hazard profiles.

The historical record is relevant because it demonstrates the site's long-standing safety culture, operational discipline and workforce capability in managing highly regulated, hazardous materials under stringent oversight. That foundation matters when evaluating whether a site and organization are capable of safely implementing new or modernized processes, even when those processes have varying hazard profiles.

At the same time, BWXT has been clear that new conversion and purification steps are evaluated on their own merits, using modern design standards, conservative hazard analyses and regulatory review tailored to those specific processes. The fact that the HPDU project includes chemical manufacturing steps that align with a different NAICS classification does not mean safety is inferred from history, it means safety is demonstrated through engineered controls, process design, training and permitting appropriate to those hazards. Historical metal reduction experience provides assurance that the site has successfully managed complex, hazardous operations over decades, while regulatory permitting and environmental reviews provide the mechanism to independently verify the safety of the modernized chemical processes before they are authorized to operate.

In short, BWXT's safety assurance does not rely on equating old processes with new ones. It relies on a combination of proven institutional capability, conservative process selection and regulator-led evaluation of each distinct hazard profile. This distinction is important, and it reinforces why operational safety determinations belong in permitting and licensing processes, not in a land-use rezoning decisions, which properly focus on site suitability rather than certifying individual industrial processes.

c. Operational History of These Specific Processes: Has this specific high-purity depleted uranium conversion and purification process (NAICS 325180

- Basic Inorganic Chemical Manufacturing) ever been performed before at this scale by BWXT or any other operator? If so, where and for how long? If it has been performed at pilot scale, please identify the location, duration, and any documented safety record from those operations.

BWXT's HPDU project is not based on an unproven concept. The individual unit operations that comprise high purity depleted uranium conversion and purification, including chemical conversion steps, purification, filtration and controlled materials handling, are well established within the U.S. nuclear and chemical industrial base. These activities have been performed safely for decades by multiple operators in regulated environments. Historically, many of those industrial pathways (including legacy operations at this site and elsewhere) utilized UF_6-based feedstocks to produce intermediate compounds such as UF_4 and ultimately uranium metal. BWXT's current approach deliberately modernizes that legacy capability by selecting process configurations and safety features aligned with contemporary regulatory expectations, most notably, utilizing oxide feedstock rather than UF_6, a decision made from an abundance of caution to reduce upstream hazards while still achieving the required end product.

With respect to whether this specific integrated HPDU production-scale configuration has previously been operated at full production scale, the accurate characterization is that the current project represents a new, contract-specific integration of established unit operations, rather than a replication of an identical production line operated elsewhere. In terms of production scale on an annual basis, the end product produced from this scope is in line with historical amounts produced previously on an annual basis.

d. Safety Assurance Basis: If these specific chemical conversion and purification processes have been performed elsewhere at production scale, what is the documented safety record that supports BWXT's safety assurances? If these processes have not been performed at production scale previously, on what basis can BWXT provide confident safety assurances about operations without a production-scale operational history?

BWXT's safety assurances are not based on a claim that an identical, fully integrated HPDU production line has operated elsewhere unchanged for decades. These assurances are based on the documented industrial safety record of the individual chemical unit operations involved and the way those operations are implemented today. Chemical conversion, purification, acid handling and solids processing have all been performed at production scale in the nuclear and broader chemical industries for many years, including historically within uranium conversion pathways. What differs today is not the existence of hazards, but the modernization

of how they are controlled through feedstock selection, materials of construction, enclosure, automation, monitoring and regulatory oversight.

BWXT's assurances at a scope-specific level are appropriately rooted in design-basis safety, not operating history alone. That is why production-scale operation is contingent on formal hazard analyses, permitting, licensing, inspections and readiness reviews before startup. This is the same framework used across the chemical manufacturing industry, where mature processes are deployed in updated configurations. Throughout the modern chemical manufacturing industry, legacy chemistries that once had higher incident rates are now routinely operated with orders-of-magnitude risk reduction because of advances in process safety management, containment and automation. In that same way, BWXT's assurances reflect how hazards are either engineered out or tightly controlled, and how regulators independently verify that control, rather than reliance on a single prior production-scale example at this exact configuration.

We understand that operations evolve and modernize over time. However, when new chemical processes with different industrial classifications are introduced, commissioners and the community need clarity about whether safety assurances rest on historical experience with these specific processes or on engineering projections for processes that have not previously operated at this scale. This distinction is essential for evaluating the appropriateness of locating these operations adjacent to agricultural and residential land uses.

BWXT agrees that clarity matters when discussing evolving and modernized operations, and that distinction is precisely what BWXT has sought to provide throughout these responses. Safety assurance for the HPDU project rests on a combination of established industrial experience with the underlying unit operations and conservative, regulator-reviewed engineering design for the integrated production configuration. This approach is standard across industries and is why detailed operational safety determinations are made through permitting, licensing and environmental review processes, not through zoning.

At the same time, BWXT has engaged in this dialogue to provide transparency and to address public questions in good faith. However, it is also evident that many of the concerns raised conflate operational safety certification with land-use suitability, which are distinct determinations under Washington County law. Zoning evaluates whether an industrial use is appropriate for a given location based on compatibility, buffering, access, flood avoidance and similar planning criteria, it does not adjudicate the technical safety of specific processes. BWXT's position remains that the proposed use is appropriate from a land-use perspective, as affirmed by the Planning Office staff recommendation, while the detailed evaluation of process-specific safety properly occurs through the established regulatory framework designed for that purpose.

13. Characterization & Applicability of Environmental Assessment EA-2252

We're seeking clarification on how EA-2252 relates to the current rezoning request, as there appear to be different characterizations of this assessment in BWXT's public materials.

BWXT's informational webpage created during the rezoning process states: "In November 2024, the NNSA reviewed the risk of both actions for depleted uranium processing and published a Finding of No Significant Impact (FONSI)." This webpage cites EA-2252's safety conclusions regarding terrorism risks and environmental impacts.

***https://www.energy.gov/nepa/doeea-2252-site-depleted-uranium-manufacturing-multiple-locations-tn**

However, in your January 2026 Q&A document (page 35), employment figures from EA-2252 are characterized as applying only to "pilot-scale scope" and described as "not representative of the current NNSA production mission." The Q&A indicates the actual project will create 190 operational jobs—19 times more than the 10 workers analyzed in EA-2252—and notes "the current scope will be subject to its own NEPA review."

To help the community understand the scope and environmental review status of this project, please clarify:

a. **Scope Characterization: When EA-2252 is cited on your website as analyzing "depleted uranium processing" at the facility, but employment figures from the same document are later described as "pilot-scale," which characterization accurately reflects the relationship between EA-2252 and the current rezoning request?**

EA-2252, as finalized in late 2024, is best understood as a baseline environmental analysis that evaluated depleted uranium processing activities at the Jonesborough site at a limited capacity, rather than as a comprehensive assessment of the full HPDU production capability contemplated under the current contract and rezoning request. The document appropriately characterized those pilot-scale activities, including associated staffing levels and concluded that the analyzed scope could be conducted safely and without significant environmental impact. In that sense, EA-2252 provides useful context and precedent that depleted uranium processing, when properly designed and regulated, is compatible with the site and surrounding environment.

At the same time, EA-2252 does not represent the full scope or capacity of the HPDU program now being implemented, nor was it intended to do so. The current project involves capacities and facility configurations that go beyond what was analyzed in that earlier environmental review. Additional NEPA review will be required to evaluate all production activities and applicable construction activities associated with the current contract before those activities may proceed. That sequencing is standard and appropriate.

It is also important to note that NEPA is a federal process directed and controlled by the NNSA and the U.S. government, not BWXT. BWXT supports the process by providing technical information at the government's direction, but determinations regarding the scope, adequacy, and conclusions of NEPA reviews are made by the federal agency. Accordingly, questions regarding NEPA applicability, sufficiency, or future analyses are properly addressed to the NNSA, as BWXT is executing this work in accordance with government direction and established federal environmental review requirements.

b. Applicability of Safety Findings: If EA-2252 analyzed a pilot-scale operation as the Q&A suggests, please explain how its safety and environmental impact conclusions apply to the larger production operation now proposed. Specifically, how do emission rates, accident scenarios, and environmental impacts from a 10-worker operation translate to a 190-worker production facility?

EA-2252 should be viewed as a baseline NEPA analysis that evaluated a limited scope and concluded that, for the activities and capacity analyzed, depleted uranium processing could be conducted safely and without significant environmental impact under the applicable controls and regulatory framework. It is not presented as a one-for-one proxy for the current production-scale project. The appropriate way EA-2252 informs today's discussion is that it establishes precedent that this type of work can be performed safely at this site when properly designed, permitted, and overseen, and it documents the kinds of resources and impact categories that are evaluated under NEPA.

That said, BWXT has been clear that production-scale operations are not justified by simply scaling up pilot conclusions and that is why additional NEPA review and permitting actions are required before production-scale activities may proceed. Emission rates, accident scenarios and environmental impacts do not "translate" based on headcount; they are driven by process throughput, equipment design, containment/control systems and operational limits, all of which must be evaluated

using regulator-approved methods for the production configuration. The difference between a 10-worker pilot operation and a ~190-worker operating workforce primarily reflects the scope of operations, staffing for safety/quality/compliance, maintenance and management, not a linear multiplier of emissions or risk. Production-scale emissions and accident analyses will be based on defined source terms and engineered controls (containment, filtration/scrubbing, monitoring, emergency systems), and they will be reviewed and approved through the required permitting, licensing and NEPA processes.

Finally, because NEPA is directed by the federal action agency, NNSA determines the appropriate scope and level of NEPA review for the production-scale project and evaluates the relevant emissions, accident scenarios and environmental impacts based on the updated design and capacity. BWXT supports that process by providing technical information at the government's direction, but the applicability and conclusions of NEPA for the larger production operation are ultimately NNSA's responsibility and determination.

c. Scope Communication with Federal Agencies: EA-2252 was finalized in November 2024, concurrent with the rezoning process. Please clarify whether the full production scope (190 workers, full-scale manufacturing) was communicated to DOE during the EA-2252 review, or whether the environmental assessment analyzed the smaller pilot-scale operation.

EA-2252 was finalized in November 2024, based on the limited, defined scope, and it provides a baseline NEPA analysis for depleted uranium processing at that scale. It does not authorize or evaluate the full production-scale HPDU program. At the time EA-2252 was prepared, the expanded production scope of approximately 190 workers and full manufacturing capacity had not yet been solicited or awarded and could not have been fully analyzed within that environmental assessment.

Consistent with NEPA practice, production-scale operations cannot proceed based on EA-2252 alone. Prior to any expanded production, capacity assumptions, emission inventories, accident scenarios and environmental impacts must be updated and evaluated through the appropriate NEPA and permitting processes. Those determinations are made by DOE/NNSA as the federal action agency, with BWXT providing technical information at the government's direction. In this way, EA-2252 serves as a reference point for understanding the site and process at a limited scale, while subsequent environmental review ensures that expanded operations are independently assessed and authorized before production occurs.

d. **Relevance to Current Project: Please help our community understand why EA-2252's safety findings are cited in support of rezoning if, as the Q&A states, those findings are based on pilot-scale operations not representative of the current production mission.**

EA-2252 is cited in BWXT's materials for context and transparency, not as a substitute for the environmental or safety evaluations that will be required for production-scale operations related to production operations that will be taking place within the rezone area. The document demonstrates that depleted uranium processing at the Jonesborough site has already been evaluated under NEPA at a defined, limited scale and found to present no significant environmental impact when properly designed and regulated. That history helps inform the public discussion by showing how safety and environmental factors are reviewed by federal agencies, even though EA-2252 does not represent approval of the current production-scale mission.

It is also important to be clear that NEPA findings, whether pilot-scale or production-scale, are not part of the rezoning criteria. Rezoning is a land-use determination, focused on whether industrial use is appropriate for the location based on compatibility, buffering, access, flood avoidance and planning considerations. EA-2252 is referenced to provide visibility into the regulatory framework and oversight that governs these activities, not to justify land use. Production-scale safety, emissions and accident analyses will be evaluated through the appropriate NEPA and permitting processes directed by DOE/NNSA, independent of zoning. Referencing EA-2252 in the rezoning discussion does not mix or substitute those processes, it provides background on how environmental safety is addressed outside the zoning decision.

e. **Guidance for Decision-Makers: How should our community and our commissioners evaluate safety and environmental impacts when EA-2252 is cited for favorable safety conclusions but characterized as not representative of the actual proposed scope? This creates uncertainty about which environmental review findings apply to the rezoning decision.**

The appropriate way for the community and commissioners to evaluate this issue is to separate land-use determinations from operational and environmental approvals, as required by law. EA-2252 is cited to provide context and transparency about the federal regulatory framework, not to serve as a proxy for evaluating production-scale safety or environmental impacts within a rezoning decision. When an environmental document is described as not representative of a future expanded scope that does

not create uncertainty for zoning, it reflects the proper sequencing of regulatory review where land use is addressed first, and process-specific environmental analyses follow through NEPA and permitting.

Within the context of an industrial facility, safety and environmental impact determinations for specific processes are not zoning criteria. Washington County zoning evaluates whether industrial use is appropriate for a location based on land-use factors such as compatibility with surrounding uses, buffering, transportation access, flood avoidance, emergency access and consistency with planning policy. Those are the criteria commissioners are empowered to apply. Attempting to resolve disputed technical safety conclusions, radiation risk calculations or future NEPA outcomes as part of a rezoning decision would move the Planning Commission beyond its lawful role and into areas reserved for state and federal regulators.

Accordingly, EA-2252 should be understood as background information demonstrating that environmental review is an established and ongoing federal responsibility, while the rezoning decision stands on its own land-use merits. Production-scale safety and environmental impacts will be evaluated, documented and approved or denied, through the appropriate NEPA and permitting processes directed by DOE/NNSA and applicable permitting agencies before operations occur.

We understand that complex projects may evolve and that phased environmental reviews are sometimes appropriate. However, our community needs clear guidance on whether EA-2252's conclusions apply to the current proposal, or whether we should expect a separate, full-scale environmental assessment before our commissioners make a land-use decision. Please help clarify the relationship between EA-2252, the current rezoning request, and any future environmental reviews that may be needed.

EA-2252 should be understood as a context-setting environmental review for a limited, defined scope. It does not authorize or evaluate the full production-scale HPDU program now associated with the rezoning request, nor is it being used to justify land use.

The current rezoning request is appropriately addressed before production-scale environmental reviews because zoning is the threshold determination that establishes whether an industrial use is permissible on the property at all. It would be impractical and contrary to established practice to require a full, project-specific environmental assessment for facilities or capacities that cannot legally be sited until zoning is resolved.

This sequencing, land-use approval first, followed by detailed NEPA and permitting reviews once the use is allowed, is the demonstrated and lawful order of operations used nationwide. Any expansion beyond the scope analyzed in EA-2252 will undergo separate NEPA applicability determinations and, if required, additional environmental review directed by DOE/NNSA before production may proceed. The Planning Commission's role is to decide land-use suitability based on planning criteria, while environmental and operational safety reviews occur later under the regulatory frameworks specifically designed for those determinations.

14. Clarification of Safety Claims, Historical Record, and Independent Verification

BWXT frequently references its operational history at this site and other BWXT sites, including statements about "50 years of safe operation" and characterizations like "this facility has been quietly doing extremely important national security work for more than 55 years in this community" when specifically referencing AOT. BWXT also states it maintains an excellent safety record across all its operations. We're seeking clarification on how these safety claims are defined, documented, and independently verified.

Historical Safety Performance

Public records indicate several documented incidents and/or events at the AOT facility during its operational history. When BWXT characterizes this site's history as "safe operation" for five decades, please clarify:

a. **Definition of Safety Performance: What specific criteria or standards does BWXT use to characterize operations as "safe"? Does this term mean zero incidents, incidents within regulatory limits, incidents without off-site consequences, or some other standard?**

As referenced in the last round of questions, BWXT uses TRIR and DART metrics to characterize operations as safe. TRIR and DART are standard, OSHA-defined metrics used across U.S. industry to objectively measure workplace safety performance.

Total Recordable Incident Rate (TRIR) measures the number of OSHA-recordable work-related injuries and illnesses per 100 full-time employees in a year. It includes incidents such as medical treatment beyond first aid, restricted work, lost time, or

other recordable outcomes as defined by OSHA. TRIR is calculated using a standardized formula prescribed by OSHA, which allows meaningful comparison across facilities, industries, and regions.

Days Away, Restricted, or Transferred (DART) is a more specific subset of TRIR. It measures the rate of injuries or illnesses that result in an employee being unable to perform their normal job duties—either because they must miss work, work with restrictions or be temporarily reassigned. Like TRIR, DART is calculated using OSHA's standardized methodology and reflects more serious injury outcomes.

At the Jonesborough facility, these metrics demonstrate strong and improving safety performance:

- During the last 10 years, the facility's TRIR averages approximately 1.8, compared to an industry and East Tennessee regional average of roughly 3.0.
- During the last 3 years, the facility's TRIR improved further to approximately 0.73, representing less than one-quarter of the regional and industry average.
- For DART, the Jonesborough facility has a 10-year average of approximately 1.49 and a 3-year average of 0.73, compared to an industry and East Tennessee average near 2.0.

These rates are calculated and reported in accordance with OSHA's mandatory injury and illness recordkeeping requirements, which are designed to ensure consistency, transparency and regulatory accountability. Importantly, TRIR and DART measure internal workplace injuries affecting employees, not public health or environmental impacts. They are indicators of worker safety culture and operational discipline and do not represent risk to the surrounding community.

The OSHA TRIR and DART rates do not suggest that no injuries ever occur, as reflected by the recent injury at the Jonesborough facility on Feb 17, 2026, that required medical treatment. It does reflect performance over time as compared to industry peers.

The Jonesborough site has separate reporting requirements for environmental, radiological or public-safety regulatory events, with a strong record of compliance among these regulatory categories. The safety metrics cited reflect internal occupational safety performance under OSHA standards and further demonstrate the site's strong safety culture and continuous improvement over time.

b. Historical Incident Context: How should the community interpret claims of decades of "safe operation" in light of documented incidents? Are these events considered consistent with the "safe operation" characterization, or are they viewed as exceptions that don't alter the overall safety assessment?

Claims of decades of “safe operation” should be understood in the way safety is defined and measured across regulated industrial environments, not as a claim that incidents never occur. BWXT operates under a Target Zero safety mindset, with the clear expectation that no employee should ever be injured, and any injury is unacceptable and drives corrective action. That philosophy is foundational to how BWXT manages its operations and workforce.

Documented incidents at the Jonesborough facility are not evidence of an unsafe operation. These incidents are evidence of a facility that reports injuries transparently under OSHA’s mandatory reporting requirements and continuously works to reduce risk. As demonstrated by objective OSHA safety metrics, the site’s TRIR and DART rates are substantially better than both industry and East Tennessee regional averages, with sustained improvement over time. These metrics are the recognized standard for evaluating workplace safety performance and show that the facility is, by any accepted regulatory definition, a safe place to work. Importantly, these occupational injuries, while regrettable and taken seriously, do not pose risk to the surrounding community.

Characterizing the facility as “not safe” based solely on the existence of injuries is a mischaracterization of how industrial safety is evaluated and creates a misleading impression that is not supported by the data. That narrative, when repeated without context, overlooks objective performance indicators and the continuous improvement processes in place. Unfortunately, such mischaracterizations have been allowed to persist uncorrected in public forums. BWXT’s position is straightforward, with injuries demanding improvement and accountability, but isolated injuries do not negate a strong safety record. By every accepted industry and regulatory measure, the Jonesborough facility reflects a mature safety culture committed to Target Zero, not an unsafe operation.

Independent Safety Verification

To better understand how BWXT's safety performance is independently validated, please clarify:

c. Third-Party Safety Recognition: Have any of BWXT's core manufacturing or nuclear operations received independent third-party safety recognitions, such as:

- **OSHA Voluntary Protection Programs (VPP) Star**
- **DOE Voluntary Protection Program (DOE-VPP) Star**
- **National Safety Council awards**
- **Similar independent safety excellence programs**

If so, which specific facilities have received these recognitions, and in what years? If not, has BWXT chosen not to pursue these programs, and what factors influenced that decision?

BWXT's approach to safety assurance is grounded first and foremost in mandatory regulatory compliance, continuous internal performance measurement and strong regulatory oversight, rather than participation in voluntary recognition programs alone. Across BWXT's operations, safety performance is evaluated through OSHA recordkeeping, DOE/NNSA oversight where applicable, internal audits and third-party inspections required by permits and licenses. These mechanisms provide enforceable, objective and ongoing validation of safety performance.

With respect to voluntary third-party recognition programs such as OSHA's Voluntary Protection Programs (VPP), DOE-VPP, National Safety Council awards or similar initiatives, BWXT has participated selectively at certain sites and operations where those programs align with the site's regulatory structure, mission and operating model. Participation in these programs is not universal across all BWXT facilities, nor is it required to demonstrate safe operation. In many cases, particularly at sites operating under federal nuclear, radiological or classified missions, safety performance is already subject to more rigorous and continuous oversight than what is required to qualify for voluntary recognition programs, making additional certification redundant rather than additive.

At the Jonesborough facility specifically, BWXT has focused on meeting and exceeding required OSHA, environmental and radiological safety standards, as reflected in the site's strong TRIR and DART performance relative to industry and regional averages, rather than pursuing voluntary recognition programs that do not change regulatory obligations or safety outcomes. Decisions about participation in voluntary programs consider factors such as program applicability, administrative burden, workforce size and scope, overlap with existing oversight and whether participation would meaningfully improve safety performance beyond existing systems.

While BWXT recognizes the value of independent safety recognition programs and participates where appropriate, the absence of a particular voluntary designation does not indicate a lack of safety performance. BWXT's safety record is demonstrated through objective metrics, regulatory compliance, transparent reporting and continuous improvement, which remain the primary and most meaningful measures of operational safety.

If so, which specific facilities have received these recognitions, and in what years? If not, has BWXT chosen not to pursue these programs, and what factors influenced that decision?

d. Scope of Cited Safety Recognition: If BWXT references any DOE-VPP or similar recognitions, please clarify whether these apply to BWXT's primary manufacturing operations or to separate cleanup, decommissioning, or joint-venture contracts. This distinction helps commissioners understand whether cited recognitions reflect the safety performance of operations similar to what's being proposed.

DOE-VPP and similar recognitions that BWXT may reference are largely associated with DOE site environments, including cleanup, decommissioning and joint-venture operating contracts, where DOE-VPP is a common, DOE-administered framework and participation is often aligned with that contract structure and oversight model.

For the Jonesborough facility, the absence of a DOE-VPP or similar designation should not be interpreted as a lack of safety performance or accountability. Jonesborough's safety performance is demonstrated through OSHA-regulated reporting and metrics, robust internal programs and the applicable state and federal permitting/licensing oversight that governs the site's operations. Participation in voluntary recognition programs is not required to operate safely, does not replace enforceable regulatory requirements and does not change the underlying safety obligations or protections for workers and the public. BWXT's approach at Jonesborough is to focus on measurable safety outcomes, including sustained TRIR/DART performance well below industry and regional averages, rather than pursuing a voluntary designation that may not align with the site's regulatory framework or materially improve safety beyond existing controls.

BWXT understands the counterargument that a voluntary program could be viewed as an "extra layer" of reassurance. However, the appropriate "extra layer" for this project is not a voluntary award program, it is the required and regulator-led oversight that governs industrial hygiene, chemical safety, radiological controls,

emergency preparedness and environmental compliance. Those processes include inspections, reporting, corrective actions and enforceable permit conditions. All tools which are more direct and consequential than optional recognition programs. BWXT remains committed to transparency and continuous improvement at Jonesborough, but the absence of a DOE-VPP designation is not determinative of safety and is not necessary to achieve safe, compliant operations under the applicable regulatory framework.

e. **Industry Benchmarking: Given that other companies performing comparable or higher-hazard nuclear and defense work — such as Honeywell, Lockheed Martin, General Dynamics, and Northrop Grumman — publicly document third-party safety recognitions for their manufacturing facilities, how does BWXT independently benchmark and validate its safety performance claims for commissioners' evaluation?**

BWXT benchmarks and validates its safety performance using the same objective, regulator-defined measures that enables “apples-to-apples” comparison across the defense and nuclear industrial base. A voluntary safety program does not improve the ability to objectively measure safety programs and performance.

For commissioner evaluation, BWXT’s benchmarking is centered on OSHA-recordkeeping-based performance data and independent oversight mechanisms that are comparable across companies and enforceable over time, including:

- **TRIR and DART performance vs. benchmarks:** BWXT tracks TRIR/DART per OSHA recordkeeping standards and compares them to relevant industry/regional baselines. These are standardized metrics used broadly across industry, including by VPP programs themselves as part of performance expectation. For Jonesborough, BWXT has provided multi-year TRIR/DART performance showing materially better rates than relevant averages, which is a direct, quantitative benchmark.
- **Trend and leading-indicator management:** BWXT validates safety claims by demonstrating sustained improvement over time, supported by investigations, corrective actions, training and management review.
- **Regulatory and contract-driven oversight:** Beyond voluntary recognition, BWXT relies on ongoing regulatory oversight that is continuous and enforceable. This type of oversight is not symbolic; it drives corrective actions and accountability.

We recognize that industrial facilities operating over many decades may experience safety incidents while still maintaining generally safe operations, and that different metrics and standards apply across different types of facilities. Our questions arise because BWXT has pointed to its long operational history as a basis for community confidence in the current proposal, while also stating that past incidents are "not relevant to land-use or rezoning determinations." While this may not be the intent, this contrast can feel inconsistent from a community perspective.

As previously noted, Commissioner Huffine's invitation was not limited solely to land-use questions, but was explicitly framed around addressing misinformation and fostering trust. It is in that spirit that these questions are being asked. They are not intended to be accusatory or insinuative, but rather to seek clarity for the benefit of concerned residents.

Safety for employees working at the facility and for the surrounding community is a paramount concern. We appreciate BWXT's willingness to respond with transparency as it considers these questions, and we believe clear, open answers will help strengthen trust and confidence moving forward.

BWXT appreciates the opportunity to engage in this dialogue and recognizes that Commissioner Huffine's request was intended to address public concern, correct misinformation and promote transparency. We have responded in that same spirit by providing detailed information to support community understanding, even where many of the questions extend beyond what is typically addressed in a local land-use decision. Transparency, however, must operate in both directions. While BWXT has made a concerted effort to respond to questions and correct inaccuracies, a significant amount of misinformation has continued to circulate publicly, including on social media platforms, where inaccurate or incomplete statements are often repeated without correction. BWXT has engaged to attempt to correct misinformation where found and to provide accurate facts for the topic at hand.

It is equally important to maintain clarity about roles and processes. Specifically, rezoning is designed to evaluate whether a proposed use is appropriate for a location based on planning and compatibility criteria, while operational safety, environmental impacts and technical risk are evaluated through rigorous state and federal regulatory frameworks created for that purpose. BWXT's willingness to provide information outside the strict land-use context is intended to foster understanding, not to blur jurisdictional boundaries or replace regulatory oversight.

BWXT's commitment to safety and transparency is not abstract. Our employees live here. Their families live here. A vast majority of the future employees who will support this mission will come from Washington County and the surrounding communities. We would not pursue this work, or ask for its continuation in Jonesborough, if we were not confident in the design basis, regulatory oversight and safety culture that governs it. By engaging openly and distinguishing between land-use criteria and regulatory safety determinations, BWXT seeks to support informed decision-making and help the community move forward together.

Ultimately, this project represents an opportunity for Jonesborough and Washington County to continue playing a meaningful role in supporting a critical national security mission, while remaining a strong, unified community. BWXT remains committed to working collaboratively with county leadership, regulators and residents, while remaining grounded in facts, respectful dialogue and mutual accountability, to ensure this work is carried out responsibly and in the broader public interest.