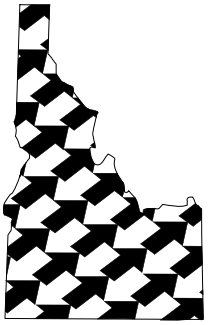

Environmental Management Site Specific Advisory Board Idaho National Engineering Laboratory

INTEGRATION OF ENVIRONMENTAL MANAGEMENT ACTIVITIES AT THE IDAHO NATIONAL ENGINEERING LABORATORY

INTRODUCTION

The Environmental Management Site Specific Advisory Board - Idaho National Engineering Laboratory (EM SSAB-INEL) met on August 1 and 2, 1995. Following presentations and discussion with Department of Energy-Idaho Operations Office (DOE-ID) and Lockheed Martin Idaho Technologies (LMIT) personnel, the Board participated in a facilitated, consensus-building process through which the following recommendation was developed. This recommendation was unanimously accepted by the Board.

RECOMMENDATION

The EM SSAB-INEL, since its inception, has sought two commitments from the DOE-ID and its Idaho National Engineering Laboratory (INEL) contractor(s): 1) early EM SSAB-INEL involvement in the development of policies and plans for the INEL; and 2) integration of DOE-ID documents, policies, funding priorities, and clean-up activities. The recently completed Integrated Product Team activity using systems engineering to integrate environmental management activities at the INEL appears to be responsive to the spirit of these and other EM SSAB-INEL recommendations, such as prioritized treatment of highest risk waste in the most cost-effective manner. We commend DOE-ID and LMIT for this effort and the resulting document.

The methodology appears to be a comprehensive and useful tool, assuming that the input is valid and that all applicable activities are incorporated. We support the effort to continue to apply and leverage systems integration at the INEL. We suggest application of a similar approach throughout the DOE complex. We especially support progress toward actual clean-up and management of the INEL wastes in a cost-effective manner that meets all applicable regulations and agreements as opposed to generating further studies. We recognize that the National Environmental Policy Act (NEPA) process, including continuing public involvement, is required for technology implementation, facility development, and changes to the existing environmental impact statement Records of Decision. This integration effort gives a solid basis for any such changes.

The EM SSAB-INEL believes that technical reviews are needed by experts not involved in the study in addition to management reviews. The assumptions used in this activity and the impact of changes in the assumptions should be evaluated, including technologies, re-negotiations of compliance agreements, and privatization. Understanding this and the need to meet NEPA requirements, the EM SSAB-INEL supports the full treatment option as being most cost-effective, timely, and responsive to public concerns.

The EM SSAB-INEL has the following additional recommendations:

All stakeholders, internal and external, need to be fully involved in the development of the environmental management integration strategy.

The impact of regulatory drivers (Comprehensive Environmental Response, Compensation, and Liability Act and Resource Conservation and Recovery Act) and NEPA requirements should be assessed and described. Additional options S3, S4, and S6 from the alternatives described in Figure 8 of the report should be evaluated to reflect the possibility of outside policy impacts, such as unavailability of a high level waste (HLW) repository, the absence of a no-migration determination for the Waste Isolation Pilot Plant (WIPP) and the need for additional transuranic waste (TRU) and HLW repositories. The impact of reduced funding needs to be considered, including the minimum funding needed to continue the preferred option.

The third bullet on page 16, ìProvide relief from guidance documents and unnecessarily restrictive legal and regulatory interpretations,î needs to be clarified in future iterations of this study to avoid the impression of circumventing regulatory oversight.

All assumptions and bases, including waste quantities, need to be documented and shown to be consistent with the Programmatic Spent Nuclear Fuel and Idaho National Engineering Laboratory Environmental Restoration and Waste Management Environmental Impact Statement, the Proposed Site Treatment Plan, and other current planning documents.