



**Citizens Advisory Board
Idaho National Engineering and Environmental Laboratory**

**End State Vision for the Idaho National Engineering and
Environmental Laboratory**

Introduction

Prior to the May 2003 meeting of the Idaho National Engineering and Environmental Laboratory (INEEL) Citizens Advisory Board (CAB), the CAB developed consensus on a recommendation on the (draft) Policy and Guidance documents addressing a new approach to cleanup decisions based on risk-based end states. Upon receipt of the Department of Energy (DOE)'s response to our recommendation, we decided to place a high priority on how the new approach would be implemented at the INEEL. At our May meeting, we decided to focus our entire July meeting on this subject to reflect our understanding that DOE's Idaho Operations Office (DOE-ID) would be required to develop a new INEEL End State Vision by September of this year. Our decision was based on our perception that this new DOE policy might have a major impact on the schedule, costs, cleanup standards, public understanding, and agency agreements concerning the INEEL environmental restoration program. In addition, we had concerns about the vagueness of the policy and lack of opportunity for public input into the development of the INEEL End State Vision because of an overly aggressive schedule.

Based on presentations provided by DOE-ID staff at our July meeting, the CAB now has a different and less urgent concern. The presentations have led us to believe that the new policy will have little or no impact on the present environmental restoration plans. We understand that the present plan is to develop a single document that will combine the basis for remediation with the end states, where established, for the various waste area groups at the INEEL. In other words, the End States as described in the new plan will be identical to those that are presently established and will not drive variances to the existing agreed upon plans.

We understand that the INEEL End State Vision will begin with the future scenarios as originally presented in the 1995 Comprehensive Facilities and Land Use Plan (CFLUP). It will then outline the vehicle for the cleanup methodology, standards,¹ schedule, and interim goals as reflected in the Project Management Plan. This will result in the actual End State and the scope and responsibilities for long term stewardship. The INEEL End State Vision will also describe the status of ongoing remedial investigations for those areas where an End State has not been established (e.g., the Idaho Nuclear Technology and Engineering Center [INTEC] high level radioactive waste tanks and Radioactive Waste Management Complex [RWMC]).

¹ Including the Comprehensive Environmental Response, Compensation, and Liability Act [CERCLA], Resource Conservation and Recovery Act [RCRA], Deactivation and Decommissioning [D&D], Idaho Settlement Agreement, Voluntary Consent Order, etc.

The CAB supports this approach, if properly implemented, as it would result in a complete and concise representation of all remediation projects, their End States, and long term stewardship commitments. Although somewhat relieved that this new policy would not change the existing remediation plans and commitments, the CAB does have two recommendations and several comments and requests concerning implementing the (draft) Policy and Guidance for End States.

Recommendations

As explained by DOE-ID, implementation of the End States Policy will improve communication about the environmental restoration program. The new policy requires DOE-ID to seek the endorsement of the public for the new INEEL End State Vision. Adequate time must be available to conduct public participation efforts that would result in public endorsement. DOE has not properly planned for this review and endorsement to occur. As a result, the CAB believes the product submitted to DOE may be of less use than expected, and not worth the expense of creating it. **Therefore, the INEEL CAB recommends that DOE-ID request an extension to submit its draft INEEL End State Vision to DOE-Headquarters to December 2003. The INEEL CAB further recommends that DOE-ID use the CAB to provide ongoing input to development of the Plan.**

Comments

In reviewing the material presented during the July meeting presentation, the CAB formulated several comments concerning the content of the End States document and the draft policy. DOE-ID is requested to incorporate into the content of its submittal these comments or provide the CAB with the rationale for not incorporating the comment(s). The document should include:

1. A clear and concise definition of "End State" including a clear explanation of when the End State is achieved and long-term stewardship begins.
2. The transition plan of going to two contracts with two DOE Programs responsible for the INEEL and one DOE-ID manager responsible for execution of the two programs. Of particular concern is the sharing of manpower and funding resources while maintaining the proper focus and priority on environmental restoration.
3. The impact of the new Nuclear Energy mission in building new facilities and responsibilities for managing newly generated wastes and their End States.
4. Staffing profiles, including plans for accommodating the expected decrease in levels and changes in the skill mix both in the short- and long-term.
5. A clear assignment of long term stewardship responsibilities including those cases where the landlords may change from Federal control.
6. The impact and plans for management of natural resources (e.g., the Sagebrush Steppe Reserve).

Requests

The cause of the CAB's initial concern and frustration is believed to be a breakdown of communications between the DOE-HQ, DOE-ID, and the CAB. This resulted in some unnecessary CAB work and a misunderstanding of priorities. *The CAB requests that the DOE-ID critique this breakdown of communication and report to the CAB their findings and actions to improve this type of deficiency.*

The CAB requests copies of the final End State Policy and Guidance documents as soon as they are available. The CAB also requests that the DOE-ID confirm that the CAB's present understanding of the (draft) Policy and Guidance for End States as discussed above is correct.