



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

**Long-Term Stewardship Implementation Plan for the Idaho  
National Engineering and Environmental Laboratory**

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The Idaho National Engineering and Environmental Laboratory (INEEL) Citizens Advisory Board (CAB) has watched the development of the long-term stewardship program at the INEEL for many years. We greatly appreciate the opportunity to be involved from the beginning and commend the program's overall approach to involving the public.

We have received and reviewed the Long-Term Stewardship Implementation Plan. The document is well structured and clearly written.

The INEEL CAB believes long-term stewardship is the mechanism for assuring continued protection of human health and the environment once cleanup efforts have been fully implemented. We have stated repeatedly that we are concerned about the transfer of responsibility for implementation of long-term stewardship activities from the Environmental Management program to the Nuclear Energy program once INEEL cleanup has been completed. Also, we have recommended there be adequate and assured funding for long-term stewardship activities. Because this document is focused on the implementation of long-term stewardship activities at the INEEL, we will assume that funding will be sufficient and that responsibilities for implementing the program will be transitioned appropriately when that time comes.

Our primary comment on the document is that the strategic objectives in the plan are so broad and over-arching that it will be difficult to measure performance against them. We do not object to the strategic objectives; we simply note that performance will be difficult to assess.

Measurable performance objectives would help assure that the public, as well as the U.S. Department of Energy, will be able to evaluate implementation of the long-term stewardship program in accordance with the Implementation Plan. Performance objectives would also help ensure that the responsible DOE program and its contractor support know exactly what is expected. Such measures would also help assure that DOE's performance regarding long-term stewardship activities is publicly defensible. **The INEEL CAB recommends the incorporation of measurable performance objectives into the long-term stewardship program.**