



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

**Draft Idaho National Engineering and Environmental
Laboratory Risk-Based End State Vision**

The Environmental Management (EM) Site-Specific Advisory Board (SSAB) for the Idaho National Engineering and Environmental Laboratory (INEEL), also known as the INEEL Citizens Advisory Board (CAB), is a local advisory committee chartered under the U.S. Department of Energy's (DOE) Environmental Management SSAB Federal Advisory Committee Act Charter.

The INEEL CAB reviewed the Risk-Based End State Vision document for the INEEL (DOE/ID-11110, Rev C, dated December 2003). The CAB also received Revision D of the document at the January 2004 meeting. It is our understanding that the document is still being revised and will be submitted to DOE-Headquarters in final form at a later date. We appreciate the opportunity to be involved at this preliminary stage in DOE's decision making process.

The INEEL CAB suggests that the final document better reflect what was orally presented at the public meeting on January 20, 2004 and the CAB meeting on January 21, 2004. This consensus document communicates our recommendations for the final Risk-Based End State Vision.

Federal Control for the Foreseeable Future

The INEEL CAB recommends that DOE develop the Risk-Based End State Vision document predicated on the assumption that DOE will not continue to own and control the entire 890 square miles of the INEEL reservation for the foreseeable future. Previous long-term land use planning documentation for the INEEL presumed a 100-year ownership period (nominally until the year 2095). DOE should continue to manage the INEEL until 2095.

The INEEL CAB recognizes that it will not be possible to clean up all portions of the INEEL sufficiently to reduce risks to a point which would allow unrestricted access. We accept that some portions of the INEEL may require continued management by DOE and/or its successor after the 100-year period.

The need for ongoing federal control is to protect the public from residual hazardous and radioactive materials. While some contaminants are toxic for very long times, others degrade and are no longer dangerous after decades or a few centuries. In addition, review of the acreage at INEEL that has been contaminated by past practices reveals that less than 50% of the 890 square mile area has ever been contaminated. Retaining federal control of uncontaminated areas is unwarranted unless there is a compelling public need for the land to support implementation of the DOE mission.

The INEEL CAB notes that there was a federal policy to reduce the total property holdings under federal management as recently in the 1990s. It is therefore quite conceivable that public policy regarding federal ownership of land will change again.

The INEEL CAB recommends that DOE retain the baseline assumption for continued ownership and control until 2095. Further, the INEEL CAB recommends that DOE justify the need to retain control beyond 2095 for specific locations on the site.

The INEEL CAB recommends that the Naval Reactors Facility be included in the Risk-Based End State vision process as it lies within the 890 square mile boundaries of the INEEL.

Cleanup Scenarios

The INEEL CAB recommends that DOE use a “residential” scenario as the baseline for the level of cleanup for the entire 890 square miles of the INEEL reservation. The assumptions of the Risk-Based End State document serve as the first step towards abolishing use of residential future scenarios for cleanup and replacing them with industrial future scenarios. Using the residential standard, at least 50% of the site is currently suitable for residential use and with additional cleanup; much of the remainder could be suitable for residential use at some point in the future. It should be DOE’s responsibility to justify a lower level of cleanup (an “unlimited industrial” scenario) for only those areas that are significantly contaminated or are being used for ongoing missions. Industrial cleanup levels should be the exception rather than the rule.

Some portions of the site that are presently contaminated will no longer pose a threat in years to come. Examples include:

- Test Area North – Active remediation will be completed by 2035, at which time Test Area North will be suitable for unrestricted residential or industrial use with the exception of small areas needing institutional control and monitoring of the groundwater plume.
- Central Facilities Area – Remediation of all contaminated areas is now complete and for the most part this area is suitable for residential use (it was the principal residential area during the Navy days). Old landfills will need to be kept under institutional control for up to 185 years.

In other portions of the site, the marginal cost of cleaning to residential use or to unrestricted surface access (instead of simply to industrial use) would be reasonable. An example would be the site-wide unexploded ordnance. The goals of the current Records of Decision are to completely clean up these areas and that goal should not be compromised.

It would be acceptable to the INEEL CAB if the Risk-Based End States document designated specific locations where residential cleanup is not appropriate. In these cases, the necessary institutional controls should be described.