



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

**Site Transition Framework for Long-Term Stewardship**

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The Idaho National Engineering and Environmental (INEEL) Citizens Advisory Board (CAB) received the Draft Site Transition Framework for Long-Term Stewardship (Revision 1, dated July 1, 2002) on September 24, 2002 through Frederick Dowd of the U.S. Department of Energy (DOE)'s Office Intergovernmental and Public Accountability (EM-11). We understand that the public comment period on the document ended on October 18, 2002. We further understand that the Paducah Gaseous Diffusion Plant CAB requested an extension in the public comment period and that the extension was not granted, but the Paducah CAB was told that comments received by the middle of November would be considered to the extent practical. Because the INEEL CAB develops all recommendations through consensus, we were not able to meet to discuss our reactions and concerns on the document until our November 2002 meeting. Accordingly, we submit this consensus recommendation in hopes that you will be able to address our comments, although they will be received after the deadline for the public comment period.

The Site Transition Framework for Long-Term Stewardship is comprehensive and of high quality, particularly Sections VII and VIII. We compliment DOE for attempting to understand and document the many items that are required for implementing effective long-term stewardship at a closure site. Our comments are primarily suggestions for improvement.

**The INEEL CAB recommends that the commitment to making all relevant documentation (identifying site historical uses, characterization, and remedial actions) be moved from the bullet under Section II to Section VII.** All relevant documents should be made available to the public, particularly if it is expected that the community will have a role in implementing any long-term stewardship activities once DOE releases the land from federal ownership.

The document does not address the long-term need to conduct research and development activities on new cleanup technologies. It is possible that emerging technologies could further reduce risks to humans or the environment posed by residual contamination (remaining post remediation) and/or the costs associated with long-term surveillance and monitoring of engineered and institutional controls. **The INEEL CAB recommends adding language where appropriate that would commit DOE to implementing new remedies that could reduce risks and/or the costs on long-term surveillance and monitoring.**

**The INEEL CAB recommends that Section IV.2.8 be clarified.** We were unable to discern whether the item refers to institutional control or engineered controls, and could imagine two entirely different interpretations of what DOE intended to say.

Section VI.B addresses funding for long-term stewardship. DOE's funding under the current administration is far from assured, and funding concerns are common to all activities under the Environmental Management Program. **The INEEL CAB recommends that DOE commit to assured funding for long-term stewardship.**

**The INEEL CAB recommends that Sections VII and VIII both include a bullet emphasizing a commitment to continued public access to all relevant documentation.**