



Citizens Advisory Board  
Idaho National Engineering and Environmental Laboratory

**IMPLEMENTATION OF THE COMPREHENSIVE  
ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY  
ACT AT THE IDAHO NATIONAL ENGINEERING AND  
ENVIRONMENTAL LABORATORY**

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**INTRODUCTION**

The following recommendation is submitted to the Department of Energy's Idaho Operations Office (DOE-ID); Region X of the U.S. Environmental Protection Agency; and the State of Idaho as the Idaho National Engineering and Environmental Laboratory (INEEL) Citizens Advisory Board's (CAB) comments on the approach being followed by the three agencies to comply with the Comprehensive Environmental Response Compensation, and Liability Act (CERCLA) at the INEEL.

The INEEL CAB has recently completed reviews of the Proposed Plans for Waste Area Group 1 (WAG 1 – Test Area North), Waste Area Group 8 (WAG 8 – Naval Reactors Facility), and Waste Area Group 9 (WAG 9 – Argonne National Laboratory–West). Our recommendation and comments are based on those reviews.

The INEEL CAB recommends that the agencies consider involving the Board when Proposed Plans are in the draft stage. We believe that we could better serve the agencies as a sounding board, with an overall goal of helping to produce documents that are ready for review by the public. In addition, we submit the following comments.

Responses to questions addressed to the DOE-ID Manager for WAG 1 revealed that the selection of the preferred alternatives may have involved consideration of issues beyond the evaluation criteria required by CERCLA. The full rationale should be fully explained and should include consideration of whether the alternative will resolve the problem at hand or simply move it somewhere else.

With regard to cost estimates and how they are presented, the three Proposed Plans we have recently reviewed present cost estimates for all remedial alternatives considered, yet the cost estimates do not appear to represent DOE's best estimates of the total life cycle costs. This conclusion is based on notes in the comparison tables in the Proposed Plans as well as remarks made during presentations to the Board and the Board's Environmental Restoration Committee. In addition to cost estimates that are required for presentation in Proposed Plans, the INEEL CAB recommends that future Proposed Plans for remediation at the INEEL include total life cycle costs for each alternative that are calculated in as straightforward a manner as possible and represent DOE's best estimate of the true and real costs.

If cost information is presented in the requested manner, the public will be better able to make comparisons among the alternatives based on costs. In addition, the Board recommends that all assumptions that provide the basis for the cost estimates be uniformly applied.

The Board's review of the WAG 1 Proposed Plan resulted in concerns that extend beyond the scope of that document. As a result, we have two additional recommendations that apply to all future Proposed Plans.

The proposed remediation plan for the Mercury Spill Area (TSF-08) at WAG 1 will be the third cleanup that has occurred at that site since the mercury was spilled. The description of prior cleanup activities in

the WAG 1 Proposed Plan raised concerns about repeated efforts that prove to be insufficient to reduce risks to acceptable levels. The Board recommends that all future remediation activities, whether interim or final, be carried out in such a way that they will reduce risks to humans and the environment sufficiently that remediation activities will not have to be repeated at a later time. Repeating remediation activities at the same site is unacceptable. The INEEL CAB is certain that cleaning up a contaminated site multiple times is more costly than doing it once.

Finally, the INEEL CAB thought the Proposed Plan for WAG 1 was very difficult to read as there were so many alternatives presented for so many different types of contaminated sites. The presentation to the Board included details that allowed for an improved understanding of the nature and extent of the contamination not provided in the Proposed Plan. The Board recommends that future Proposed Plans provide descriptions that the public can understand.