



Citizens Advisory Board  
Idaho National Engineering and Environmental Laboratory

**Idaho National Engineering and Environmental Laboratory  
Institutional Plan, Fiscal Years 2001 – 2005**

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The U.S. Department of Energy's Idaho Operations Office (DOE-ID) recently requested that the Idaho National Engineering and Environmental Laboratory (INEEL) Citizen Advisory Board (CAB) review and comment on the INEEL Institutional Plan for Fiscal Years 2001 through 2005. As we understand it, the Institutional Plan is prepared by the INEEL contractor to address the site mission as dictated to the contractor and how the contractor will operate to achieve that mission. Although the INEEL Institutional Plan addresses both current cleanup activities and a future site mission, we conclude that the document's primary purpose is to focus attention on establishment of an enduring future mission for the INEEL. We recognize the importance of both, and are keenly aware of the conflicts between today's activities and tomorrow's needs.

There appears to be an overriding assumption supporting this Institutional Plan that warrants extensive discussion between DOE and the public: that establishment and operation of an enduring, world-class scientific laboratory can only be accomplished by diverting some amount of funds from other purposes at the INEEL, including the cleanup program. We assume that the justification for such a diversion must derive from a belief that the laboratory's scientific inquiry will eventually "pay-off" in reduced costs, faster remediation, or enhanced risk reduction. We are nonetheless keenly aware that DOE-ID's funding in recent years has been flat (not increasing) and less-than-adequate.

The INEEL CAB has historically supported establishment of an enduring mission for the INEEL, in part based on a belief that another mission would help ensure continued funding for the cleanup program. We have never attempted to achieve consensus on funding establishment of a future mission at the short-term expense of the cleanup program, however. Further, given the intense public concerns about environmental contamination at the site, we are less than certain whether the public would be willing to short-change the cleanup program, even if long-term benefits could result. Consequently, we conclude that DOE should undertake informed discussion with the public before assuming the public would support pursuit of new missions for the site.

**The INEEL CAB recommends that future Institutional Plans, at a minimum, openly discuss the impacts of any delays in the cleanup program that result from pursuit of a future mission, including impacts on 1) the level of protection of people and the environment, 2) the associated costs, and 3) the revised timing of the anticipated cleanup.**

As occurred the last time that we reviewed an Institutional Plan, the CAB continues to have little success in moving between data presented in the text, figures, and tables. For example we are unable to translate numbers from Table 33 (Section VI) to Figure 5 (Section III). We cannot determine funding by Secretarial Officer for all funds included under the \$451, 915 K flat funding, nor discern the rationale for what is included in the funding gap. Additionally, Table 23 (Section V) appears to have little specificity with regard to identified "projects" or "Construction." We were unable to find reference in the text or other tables just what "High-Level Waste General Plant Projects" include. Neither can we find a relationship with Tables 22 and 25. **The INEEL CAB repeats its prior recommendation that every effort be made to improve the consistency between various sections of the Plan and budget numbers.**

Several figures relate to funding in future years, including Figures 5 (Section III) and 20 (Section V). While addressing different levels and purposes, the figures nonetheless make a point that INEEL expects budget shortfalls. **The INEEL CAB recommends that the Plan more clearly address the management of funds received to accomplish on-going and mandated environmental remediation activities as well as build for the future to sustain a world class facility.**

Statements beginning on page 26 that describe the on-going remedial investigation and feasibility study (RI/FS) at Waste Area Group 7 imply that the RI/FS has been completed; as we understand it is not scheduled for completion until March 2002. It is not yet known what remedial actions will be necessary and appropriate in WAG 7. **Even if a technically defensible strategy for WAG 7 has been developed, the INEEL CAB believes the cleanup process under CERCLA should not be compromised.** Until DOE, the State of Idaho, and the Environmental Protection Agency have signed a Record of Decision, it will be impossible to support the statement that "implementation of this strategy and the supporting technical initiatives will significantly reduce the cost and schedule for remediating the transuranic-contaminated buried waste at the Radioactive Waste Management Complex. Similarly, the discussion under item (b) *Strategic Objectives* (on page 27) appears to be extremely optimistic, particularly the objectives regarding WAG 3, WAG 7, the Sodium Bearing Waste Treatment Facility, and the Calcine Waste Treatment Facility.

**The INEEL CAB recommends that INEEL pursue a diversified energy research and development program to offer the greatest potential benefit to the site. Further, the INEEL CAB recommends that INEEL's nuclear energy program focus on resolving those public concerns (proliferation, nuclear waste, safety, and cost) that hinder public acceptance of nuclear energy.**

**The INEEL CAB recommends that future Institutional Plans provide more specificity with respect to land management and land stewardship of the 890 square miles that constitute the site.** We recommend that future Institutional Plans include:

- Land management and stewardship goals and programs with descriptions of how each contributes to compliance with the Secretary of Energy's directive to "use ecosystem management principles" for managing the entire site;
- Cost information for all land management programs, such as wildfire prevention and suppression, wildfire rehabilitation, weed monitoring and control, and coordination with the Bureau of Land Management on grazing leases; and
- Updated maps of all ecological and cultural resources at the site, including the Sagebrush Steppe Reserve, the 50-year vegetation plots, and other ecological and cultural features.

In addition to the above, a set of detailed comments and suggestions follows:

- We question the apparent omission of compliance with the Idaho Settlement Agreement from the section titled "Laboratory Mission and Roles" which begins on page 11. Failure to mention the Agreement allows the impression that it is not important. Achievement of the commitments made under the agreement is of paramount importance to the citizens of Idaho.
- The core competency discussions (on page 11) appear to focus only on the professional workforce rather than the entire, more academically diverse workforce needed to accomplish all of the site's objectives. Consequently, there is little or no attention paid to strengthening that portion of the workforce that is non-degreed.

- An additional objective that could be added to the description of the LDRD program on page 16 would be to improve the awarding of research grants in the coming year by x percent or perhaps x dollars.
- The fourth assumption listed under the "Institutional Planning Assumptions" on page 21 implies that INEEL's focus will shift from environmental cleanup to research and development. However, the dates and activities in Appendix B will not support such a shift over that time frame.
- The eighth assumption listed under the "Institutional Planning Assumptions" on page 21 suggests that the INEEL Information Network "will be line item funded from base programs through reprioritization activities." The INEEL CAB will be vitally interested in which base program(s) will be tapped and how that funding reduction will affect program performance.
- The "Laboratory Strategic Vision" section on page 22 references Tables 25 and 26 concerning the funding and personnel impacts of long-term stewardship activities. It also references those tables for funding and personnel impacts associated with "significant subcontracting of EM cleanup operations beginning in FY 2002/2003." Review of the two tables does not reveal any information regarding funding and personnel impacts attributable to long-term stewardship nor to significant subcontracting of cleanup operations.
- Figure 3 on page 23 appears to illustrate the ability to fund increasing R&D efforts within the flat EM budget, but an inability to fund EM compliance needs. The INEEL CAB does not quarrel with the need for strong R&D efforts, but we do not support funding those efforts at the expense of environmental compliance needs.
- The second column in Table 3 (on page 28) lists "INEEL Science or Technology Need Identification Numbers" and appears to reference Appendix C." Appendix C does not appear to contain any relevant information.
- Figure 8 on page 32 was apparently included to exemplify the text. It would be nice to find more information about the science and technology initiatives illustrated.
- Page 56 delineates the contributions expected from the Subsurface Science Initiative (SSI) in bullets. We have little reason to doubt the truthfulness of the statements. The implication, however, is that the motivation for the SSI is to justify a lesser level of cleanup because time and money are limited. It would be reassuring to know that the cleanup activities will be selected based on their demonstrated ability to meet remedial objectives. In-situ remediation of buried wastes will certainly offer lesser levels of protection to the aquifer than full excavation.
- We disagree with a statement on page 65. It seems an unneeded expenditure and quite outside INEEL's focus to become involved in "Developing and demonstrating regional transportation system . . ."
- If the level of information contained in the unnumbered table on page 69 is so gross as to require the disclaimer provided and exclusion from other tables, then perhaps it should be left out of the text completely. If the information were to serve some purpose, it would be more meaningful if the annual cost by initiative were provided.
- The discussion under the heading "Stakeholder Communication and Trust" on page 77 addresses communication to the public. The promise falls short of promising to communicate with, seek interactions with, or seek advice from stakeholders and/or the public and the implication is

disappointing. The contractor could certainly do more to support enhancement of effective relationships between DOE and the public.

- The tenor of the discussion on human resources (pages 78-79) implies that INEEL intends to recruit and retain only college graduates and makes only scant reference to the "technician and craft" workforce referred to in table 29 (on page 98.) While the totals table 29 are not added-up, it does appear that "technician and craft" workforce represents more than a third of the total number of full- and part-time employees (other than management and administrative staff). However, recruitment, retention, and other workforce enhancements are not addressed for this significant portion of the workforce. We believe they should be. Recruitment efforts should extend beyond colleges, universities, and minority institutions to include technical schools and other non-traditional programs to ensure a diverse skill mix. In addition, we would like more details regarding how the current workforce will be retained and retrained and how existing labor agreements will be maintained to create a stable and experienced workforce.
- On page 81, under the section titled "Site and Facility Management" a statement says that "*INEEL Infrastructure Project Capital Needs* prioritizes all near-term project requirements and addresses current target-funding levels . . . [which] reflects stakeholder participation." The referenced document was not known to the INEEL CAB. We wonder how it can reflect stakeholder participation if the public has not seen the document, nor had an opportunity to comment on it.
- A list of proposed new projects on page 87 suggests that a Calcined Solids Storage Facility is number 5 on the list. The CAB has never been advised about this proposal, nor was it included in the Idaho High-Level Waste Environmental Impact Statement.
- It appears that the budget figures provided in the Tables 22 through 24 on pages 88 – 91 are reported thousands, rather than millions of dollars as with most other tables and figures in the document.
- A note printed in bold text on page 97 requires further explanation. The Institutional Plan should not just describe planned initiatives but should also include solid estimates of the funding levels that would be required to accomplish the objectives outlined. Omission of this information greatly diminishes the value of the document.
- Table 31 beginning on page 100 identifies "Resources by major program" with several pages of numbers by DOE program area. We assume that the "resources" listed are staff (in full-time equivalent), but it could just as well be vehicles.
- Tables 31 and 33 include a footnote that states "a. Reflects additional new BA funding to meet compliance-driven milestone." What does BA stand for? What is meant by "additional" and "new" amounts and by "compliance-driven milestones"? One of the line items referencing footnote a is titled "SUBTOTAL DOE ROLLUP." What is meant by that term?