



Citizens Advisory Board  
Idaho National Engineering and Environmental Laboratory

**Implementation of the Department of Energy Long-Term  
Stewardship Strategic Plan at the INEEL**

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The Idaho National Engineering and Environmental Laboratory (INEEL) Citizens Advisory Board (CAB) has reviewed pre-decisional draft, version 1.0 of the Department of Energy (DOE) Long-Term Stewardship Strategic Plan (dated December 7, 2001). In general, the INEEL CAB is pleased with the mission, vision, goals, and draft principles as presented. We particularly appreciate the fact that DOE-HQ has proposed a schedule for implementing the objectives outlined in the Plan and the fact that the document reflects prior comments from the INEEL CAB and our sister Site Specific Advisory Boards.

The INEEL CAB supports DOE's conclusion, inherent throughout the document that the Department must commit to change its internal corporate culture to effectively perform its Long Term Stewardship responsibilities. Corporate culture is very difficult to change, however, and successful efforts require consistent direction, competent leadership, and clear commitment from the very top of the organization. **The INEEL CAB recommends that the DOE's Idaho Operations Office (DOE-ID) take all necessary steps to enable successful corporate change at the INEEL to embrace Long Term Stewardship into the corporate culture.**

Some intermediate steps toward implementing new thinking regarding LTS will require changes in corporate culture. Every planning document prepared by DOE could, and should, allow for consideration of LTS implications related to all alternatives being evaluated. **The INEEL CAB recommends that DOE-ID immediately require that all documents carefully delineate the LTS actions that would be required under each alternative considered, beginning with those written to comply with the National Environmental Policy Act (NEPA); the comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); and the Resource Conservation Recovery Act (RCRA).** In that manner, DOE personnel will begin to consider the LTS routinely as part of all planning efforts and all decision making processes. This would also provide an opportunity for the public to participate in decision-making processes that entail not just alternative approaches to DOE's mission, but also the LTS implications of those alternatives.

**The INEEL CAB recommends that sections addressing the LTS implications of each alternative considered in NEPA and CERCLA documents include the follow:**

1. Full discussions of the nature and extent of residual contamination that would remain after DOE has completed any proposed mission and any associated cleanup actions.
2. An assessment of the expected risks that would be associated with the described residual contamination.
3. A description of the end state that DOE used to develop the LTS requirements and how that end was envisioned.