



Department of Energy

Oak Ridge Operations Office
P.O. Box 2001
Oak Ridge, Tennessee 37831—

May 31, 1996

Mr. Robert Peelle, Chair
Oak Ridge Reservation Environmental Management
Site Specific Advisory Board
3 Main Street
Oak Ridge, Tennessee 37830

Dear Mr. Peelle:

Transmittal of Responses to Comments for the Department of Energy-Oak Ridge Operations Office Fiscal Year 1998 Integrated Environmental Management Prioritization

The Department of Energy (DOE) appreciates both the effort expended and the comments received from the Oak Ridge Reservation Environmental Management Site Specific Advisory Board (ORREMSSAB) on the DOE-Oak Ridge Operations Office (ORO) Fiscal Year 1998 Integrated Environmental Management (EM) Prioritization. DOE is committed to emphasis of risk reduction in management of the EM program; and in support of this objective, the Management Evaluation Process (MEP) was developed by the DOE EM Program to serve as a consistent, risk-based methodology for determining the priority of all EM activities. The MEP is a tool to assist DOE, regulators, and the stakeholders in dealing with all EM activities in an orderly, cost-effective manner. Given the limited resources, DOE-ORO will be using the MEP to assist in the best distribution of funds.


DOE is concerned with the issues you identified and will continue to strive to improve the prioritization process. Specifically, DOE would like to improve the means for stakeholder participation by involving the regulators and other state representatives earlier in the prioritization process. At the present time, DOE does not believe that having a member of the ORREMSSAB attend the DOE-ORO EM Prioritization Board scoring sessions would be the most efficient means for incorporating input from the public and specifically the ORREMSSAB. In order to allow equal participation for all of the stakeholders this would not be a practical solution given the number of states involved at the DOE-ORO EM level. Nonetheless, DOE will be making every effort to obtain stakeholder participation earlier in the prioritization process and will continue to modify the prioritization process based on comments received from each of the stakeholders.

Mr. Robert Peelle

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DOE reiterates its appreciation for the ORREMSSAB's involvement and believes that with additional communication the prioritization process will continue to be improved to benefit all stakeholders involved. Attached you will find specific responses to your comments. All comments received have been transmitted to DOE Headquarters. This feedback will be used to improve the MEP. If you have any questions, please feel free to contact me at (423) 576-0742.

Sincerely,



Rodney Nelson,
Assistant Manager for Environmental Management

Enclosure

COMMENTS AND RESPONSES - DRAFT PRIORITIZATION OF FISCAL YEAR 98

No.	Originator	Item (RDS #, Work Pkg Title, etc.)	Comment	Response
1	ORREMSSAB	General Review	<p>The Oak Ridge Reservation Environmental Management Site Specific Advisory Board (ORREMSSAB) approved the attached recommendations and comments on the Draft Prioritization of Fiscal Year 98 Environmental Management Projects. The items included in the attached recommendations and comments are based on review of the available documents. In the future, with more time, our findings should display increasing insight. The ORREMSSAB appreciates the opportunity that you and your staff have provided for comments on the 1998 EM Prioritization Process. The Board is equally optimistic that you will receive these comments as being constructive and that you will incorporate them in an obvious manner. Please provide the Board with a date by which we can expect to receive written responses from you or your staff. While the ORREMSSAB takes no position on the comments from individual stakeholders, we strongly endorse reasoned consideration of their comments by DOE. We trust that all comments received by your office, along with your responses, will be transmitted to DOE-Headquarters.</p>	<p>DOE will be making every effort to obtain public participation earlier in the prioritization process for the next budget formulation cycle. DOE is committed to involving stakeholders in decisions affecting the Environmental Management Program and will continue to update the public on the prioritization process.</p> <p>All comments received by the stakeholders will be forwarded to DOE Headquarters. The DOE response to the comments will be made available in the IRC within a few days after the April 15 submission to Headquarters.</p>

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No.	Originator	Item (RDS #, Work Pkg Title, etc.)	Comment	Response
2	OOREMSSAB	General	<p>The recommendations in the report are grouped into three categories: (I) The process used to develop the priorities for 1998; (II) the documentation and presentation of the process during February 1996; and (III) the resulting draft project priority list distributed and explained February 8 and 22, 1996, to groups of interested citizens.</p> <p>On November 15, 1995, the OOREMSSAB was introduced to the concept of the Environmental Restoration Benefit Assessment Matrix (ERBAM) presented as a risk-based prioritization method for Environmental Restoration projects. On February 8 and February 22, 1996, a majority of OOREMSSAB members attended the DOE-Oak Ridge Operations (DOE-ORO) public meetings where the Management Evaluation Process was presented as a consistent risk-based methodology to determine the priority of Environmental Management (EM) activities. An OOREMSSAB Prioritization Committee was formed at the OOREMSSAB meeting of February 21, 1996 to study the prioritization materials. Eight Prioritization Committee meetings were held during the first three weeks of March, 1996. During the OOREMSSAB meetings of March 6 and March 13, successive preliminary committee reports were discussed. At the OOREMSSAB meetings on March 13 and March 25, the comments and recommendations were reviewed by</p>	<p>Comment noted and specific comments are addressed below.</p>

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No.	Originator	Item (RDS #, Work Pkg Title, etc.)	Comment	Response
2	OOREMSSAB	General (continued)	the ORREMSSAB prior to approval.	
3	ORREMSSAB	Stakeholder Input	We find in general that: There was an attempt to solicit stakeholder comments. However, due to the time schedule imposed on the process and the methodology of the process, public participation was limited.	DOE will be making every effort to obtain public participation earlier in the prioritization process. The materials were prepared and public meetings were held as soon as the information was available. Additional stakeholder meetings will be scheduled once updated information is available.
4	ORREMSSAB	Environmental Management	The combination of Environmental Restoration and Waste Management projects into a single list is beneficial from the standpoint of a more holistic understanding of the Oak Ridge Reservation (ORR) cleanup.	The Prioritization Lists for FY98 Projects represent all Environmental Management (Environmental Restoration, Waste Management, Formally Utilized Sites Remedial Action Program, and Weldon Spring Site Remedial Action Project) programs for the DOE Oak Ridge Operations Office.
5	ORREMSSAB	Management Evaluation Process	The use of the Management Evaluation Process represents an improvement over previous methods for budget prioritization. However, we point out some shortcomings in the approach in later sections.	DOE is committed to incorporating risk management into the Environmental Management program. The Management Evaluation Process has been developed to provide a meaningful way to prioritize the risks at the DOE sites so that DOE can work with the Congress, the regulators, and the public to deal with the risks in an orderly and cost-effective manner. Specific comments are addressed below.

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6	ORREMSSAB	General	<p>ORREMSSAB members supplemented their review of the Draft Prioritization Document with review of associated material as well as personal knowledge of some project areas and management tools. The plausibilities of the likelihood and severity data used by DOE were scanned and the risk-based methodology was studied during the month and a half that we had the data.</p> <p>We also reviewed and discussed the questions and suggestions submitted to DOE by other groups and members of the public (see Attachment I.) We believe that these are important and are pleased that DOE plans to respond to each comment. DOE will find that some of the points made by others are contained within or closely related to the comments prepared by the ORREMSSAB. We believe such concurrence highlights areas of particular concern. Moreover, there are additional interested individuals and groups that could contribute to prioritization efforts in subsequent years.</p>	<p>Comment noted and specific comments are addressed below.</p>

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7	ORREMSSAB	Relative Ranking	<p>It is appropriate that DOE uses the prioritization process as guidance, recognizing that the results are relative rather than absolute.</p> <p>Although the ORREMSSAB accepts that DOE retains the option of rearranging the priorities after the initial ranking based on other considerations, we believe that such "judgement calls" should be identified in the final document, perhaps in a comment column. Examples of this that have been mentioned to us are: cases of mortgage reduction; the application of a "Small Site Strategy" to rapidly eliminate the existence of stand-alone, widely separated contaminated sites as a matter of reducing overall costs; and the increased priority given to maintenance of the general infrastructure of the K-25 Site - a task which was not highly rated by the method.</p>	<p>You are correct in stating that the Prioritization List is a relative ranking.</p> <p>Unfortunately, we were not able to present to the public a comprehensive overview of the prioritization assumptions. DOE would like to continue improving the prioritization process and make this level of information available to all involved in a timely fashion in support of the budget formulation cycle.</p>

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No.	Originator	Item (RDS #, Work Pkg Title, etc.)	Comment	Response
8	ORREMSSAB	MEP	<p>The method used to establish scores does not appear to be logically sound. DOE should attempt to obtain a supportable method with documentation. For example, both direct off-site economic impacts and impacts to future generations appear to be under weighted. Nonmarket values should be included. The method should include these areas as they are some of the chief incentives for environmental restoration. In future years, documentation of the method should include sensitivity analysis to illustrate how much the rankings change as the method is altered. Otherwise, the attentive public may distrust the method even for use to generate a first approximation ranking.</p>	<p>The weights used for scoring were determined by the EM Prioritization Board. They are based on the relative importance the Board members place on these categories and are consistent with the mission of EM. However, DOE is concerned with all of the impact categories.</p> <p>Non-market values are included in the Social/Cultural/Economic category. However, in the future DOE hopes to involve stakeholders earlier so that potential concerns are addressed early in the process. The current application of the MEM has focused on the direct impacts of potential releases to human health, worker safety, and the environment, giving these categories higher weights.</p>
9	ORREMSSAB	Independent Review	<p>Because an approximate method of this type is conceptually complex, independent peer review of the method should be required and made available to the public along with any DOE response.</p>	<p>DOE Oak Ridge Operations Office anticipates that an independent review of this process will be conducted in addition to the several levels of peer and stakeholder review. Once the independent review is conducted, these comments will be made available to the public.</p>

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No.	Originator	Item (RDS #, Work Pkg Title, etc.)	Comment	Response
10	ORREMSSAB	Standard Assumptions	The ORREMSSAB believes that the guidelines established for determination of the severity and likelihood of potential impacts of projects are too subjective and result in inconsistent measurement of the magnitude of an impact. Differences exist in individual's interpretations of risk. Therefore, efforts should be made to ensure consistency in manager's interpretations of severity and likelihood. Guidelines should be as objective as possible. Efforts to ensure consistency should be communicated to the public.	<p>It is important that we develop a standard set of assumptions to support the determination of impact and likelihood of occurrence. The CERCLA guidance for risk assessment is the basis for the Public, Safety and Health and Environmental Protection categories.</p> <p>Unfortunately, we were not able to present to the public a comprehensive overview of the prioritization assumptions. We would like to continue to improve the prioritization process over the next year and part of this should be to make this level of information available to all involved in a timely fashion in support of the next RDS submittal.</p>
11	ORREMSSAB	Independent Review	We recommend independent peer review of the likelihood and severity data be continued as standard practice. The review should be directed towards data quality, data consistency, data usage, and data credibility. The results of this activity now conducted by contractors should be clearly communicated to the public and external independent review should be included. We recommend ORREMSSAB be included in this process.	DOE Oak Ridge Operations Office anticipates that an independent review of this process will be conducted by a national independent panel comparing submittals across operations offices.

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12	ORREMSSAB	Consistent Scoring Methods	Scoring methods for all projects at each operations office should be consistent and the results should be used as a first approximation to establish the relative priorities for EM funding to the various operations offices. This recommendation does not imply that there should be no adjustment of the estimated funding after project ranking, only that these adjustments should be for stated reasons.	The Management Evaluation Process is intended to identify and relatively rank projects that reduce risk based on the prescribed criteria. Unfortunately we were not able to present to the public a comprehensive overview of the prioritization assumptions. We would like to continue to improve the prioritization process over the next year and part of this should be to make this level of information available to all involved in a timely fashion in support of the next RDS submittal. The MEP is somewhat subjective; however, the method is based on a set of general assumptions that are consistent across the DOE complex and with the Environmental Management mission. The weighting and interpretation of categories are different for each operations office.
13	ORREMSSAB	Future Land Use	We recommend in the future that projected land use and population data, as well as current data, be used.	Future land use and population data as it affects future land use is included in the Public Safety and Health score.
14	ORREMSSAB	Off-site contamination	The ORREMSSAB believes that DOE has a perpetual and nontransferable obligation to address environmental problems caused by activities on the Oak Ridge Reservation (ORR) that impact surrounding communities. The prioritization process should be modified such that issues in the surrounding communities are addressed as expeditiously as are problems that occur on the ORR.	Indeed, the Management Evaluation Process is weighted so that off-site exposure receives greatest priority. Public Safety and Health is weighted 25% because the greatest concern is associated with the release of contamination to off-site areas beyond the control of DOE. In addition, because there are releases to off-site areas which are outside of DOE control, Public Health and Safety is considered by the Board to be the foremost category of concern.

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No.	Originator	Item (RDS #, Work Pkg Title, etc.)	Comment	Response
15	ORREMSSAB	Prioritization Process	The ORREMSSAB also recommends that DOE: (1) include a member of the ORREMSSAB at the DOE-ORO EM Prioritization Board scoring sessions and (2) convene a workshop at the start of the prioritization process for members of the ORREMSSAB and other interested organizations and public.	DOE does not believe that having a member of the ORREMSSAB attend the DOE-ORO EM Prioritization Board scoring sessions would be the most efficient means for incorporating input from the public and specifically the ORREMSSAB. In addition, in order to allow equal participation for all of the stakeholders this would not be a practical solution given the number of states involved at the DOE-ORO EM level. Nonetheless, DOE will be making every effort to obtain stakeholder participation earlier in the prioritization process and will continue to modify the prioritization process based on comments received from each of the stakeholders. DOE will schedule additional stakeholder meetings once updated information is available.
16	ORREMSSAB	Document not user-friendly	The ORREMSSAB found the document "DOE-ORO Draft Prioritization of Fiscal Year 98 Environmental Management Projects" was difficult to use and insufficient for a satisfactory understanding and evaluation of the prioritization list. We believe attention to the following items would facilitate use of the document by the public:	Given the compressed schedule of the FY98 submittal, the draft list provided to the public was not as fully completed and quality assured as desired. DOE would like to continue to improve the prioritization process over the next year and make more complete information available to all involved in a timely fashion. In the future, project narratives will be in rank order corresponding to the MEM ranking. This modification in addition to other improvements will assist in making this document easier to review.

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No.	Originator	Item (RDS #, Work Pkg Title, etc.)	Comment	Response
17	ORREMSSAB	MEP Description	include a thorough written description of the Management Evaluation Process, including references to supporting information (e.g., Management Evaluation Matrix Training Package and Reference Material);	A description of the Management Evaluation Process and other supporting documents will be included in the next submittal.
18	ORREMSSAB	Acronyms	include a glossary and a list of acronyms and abbreviations:	A list of acronyms and abbreviations will be included in subsequent versions of this report.

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No.	Originator	Item (RDS #, Work Pkg Title, etc.)	Comment	Response
19	ORREMSSAB	Format requests	<p>revise the prioritization lists to include information on:</p> <ul style="list-style-type: none"> - specific compliance authority (e.g., FFA, CERCLA, RCRA) - project location (e.g., Portsmouth, Paducah, ORNL, Y-12, K-25) - better titles (e.g., more descriptive, consistent from year to year, consistent with Federal Facility Agreement titles) - status of the project (e.g., feasibility study, proposed plan, engineering evaluation/cost analysis, action memorandum, Record of Decision; if in progress, percent complete) - fewer columns of planning dollars (e.g., consider deletions of the cumulative columns for defense, non-defense, and decontamination and decommissioning); - local economic effects. 	<p>Completed Risk Data Sheets will provide this information.</p> <p>A site location for all projects will be included in subsequent versions of this report.</p> <p>During the last year, DOE-ORO has specifically attempted to align project titles across all DOE-ORO efforts. DOE will continue to improve project title consistency in the next submittal.</p> <p>The status of the projects should be included in the Risk Data Sheets (RDSs). However, particular attention will be given to include missing project status information in subsequent versions of this report.</p> <p>DOE will consider all SSAB requests for revisions to presentation of data.</p> <p>Local economic effects are considered in the Social/Cultural/Economic impact category. Details are provided in Risk Data Sheets where applicable.</p>

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No.	Originator	Item (RDS #, Work Pkg Title, etc.)	Comment	Response
20	ORREMSSAB	Federal Salaries	remove the federal salaries and program management activities from the top of the prioritization list. A footnote to the list could explain administrative costs approximating 10 percent of the available must be subtracted from the expected total funding.	In order to account for all of the EM funds, these categories were included in the list even though they are not scored using the MEM criteria. DOE wanted to ensure that all designated funds were listed so that this information would be available to all stakeholders. Since the federal salaries item does not affect the prioritization list, it can be placed anywhere. DOE will consider all SSAB requests for revisions to presentation of data.
21	ORREMSSAB	Project Scope Information	require and include complete risk data sheet project scope summaries for all projects (R94A0059, R94F0001 and R95M0028 are good examples);	Unfortunately, due to the short time-frame to collect and assemble this data, we were not able to provide a few of the project scopes. This information will be included in subsequent versions.
22	ORREMSSAB	Stakeholder Input on RDS	include stakeholder input on the risk data sheet project scope summaries;	DOE will look into the feasibility of doing this.
23	ORREMSSAB	Project Scope in Rank Order	arrange project scope summaries by management evaluation matrix rank rather than by risk data sheet numbers;	In the future, project scopes will be in rank order corresponding to the MEM ranking.
24	ORREMSSAB	Format	include work package planning forms for major projects in the document and provide remaining work package planning forms as an appendix;	DOE will consider all SSAB requests for revisions to presentation of data.
25	ORREMSSAB	Change Control Documentation	include comments about any changes between budget years in project titles, recombination of activities within a project or other changes in the risk data sheet project summaries, and note that there are such changes on the prioritization list;	A new change control process is currently being implemented and will hopefully provide this information in subsequent reports.

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No.	Originator	Item (RDS #, Work Pkg Title, etc.)	Comment	Response
26	ORREMSSAB	Format-Project History	include a brief project history with dates, on the risk data sheets, activity data sheets or elsewhere so that the information is available to the public;	DOE will consider all SSAB requests for revisions to presentation of data.
27	ORREMSSAB	Format-Funding History	include funding history of projects on the risk data sheets, activity data sheets or elsewhere (i.e., actual dollars spent and/or planning dollars for the life of the projects);	Completed Risk Data Sheets include 8 years of funding estimates, life cycle cost estimates, and start and completion dates.
28	ORREMSSAB	Compliance	include a brief summary of EPA, TDEC, and DOE negotiations for compliance projects that are below the estimated funding level;	Pertinent status information where available will be incorporated.
29	ORREMSSAB	Master List of Funded and Unfunded Projects	provide a master list of all projects (funded and unfunded, including those not listed) that includes activity data sheet and risk data sheet numbers, management evaluation matrix ranking (including before risk score and the "delta" or difference), and ERBAM and Waste Management prioritization (if applicable in future years); and	It would be preferable to include both funded and unfunded information for clarification. All projects in the current baseline are included in the prioritization process; however, some of these projects will be completed by the year on which the submittal is based (FY 98) and others, which may be ranked higher than some on the list, cannot be started because of the lack of funds (more costly over a longer period of time than those on the list). DOE will consider including a master list of all projects for informational purposes.

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No.	Originator	Item (RDS #, Work Pkg Title, etc.)	Comment	Response
30	ORREMSSAB	Quality Assurance	develop and implement a quality assurance program for consistency of data among lists (e.g., the project ranking list, the project category weights list, and the project scope summaries.) Several examples of errors which, while not critical, detract from the inspection of the document and also its overall credibility are listed below:	Given the compressed schedule of the FY98 submittal, draft information was provided to the public without fully completed and quality assured narratives in order to allow the stakeholders more time for review/input; however, DOE would like to continue to improve the prioritization process over the next year and make more complete information available to all involved in a timely fashion.
31	ORREMSSAB	RDS Identification Number	-Page 3 (#31). "Mixed Waste Private Sector Support" is designated as R96G0011; but in the tabulation of Project Scopes on page 122, the risk data sheet is given as R96G0015.	This has been corrected.
32	ORREMSSAB	Mercury Reduction	-Page 3 (#47). The risk data sheet on page 72 shows mercury release will be reduced from 17 to 5 grams per day by December 31, 1998. This reduction will be completed after Lower East Fork Poplar Creek has been cleaned up. DOE should reduce releases to the creek in conjunction with cleanup of the creek. See R94C0005 which states cleanup is completed one year earlier.	The reduction of mercury is occurring in incremental time periods from now until 1998. Upper East Fork Poplar Creek RMPE and the Lower East Fork Poplar Creek OU are different projects that are working concurrently to reduce the mercury levels by 1998. However, the project completion date for Lower East Fork Poplar Creek is 2003. The 1998 date refers only to the reduction in mercury levels.
33	ORREMSSAB	BCV OU	-Page 61 (#21). The risk data sheet shows the Sampling and Analysis Plan for Bear Creek Operable Unit was completed November, 1994. However, this budget states it is four years later before a risk evaluation is done, which seems to be an excessive time period.	The Baseline Risk Assessment was completed in March 1996 for the Bear Creek Operable Unit and the Remedial Investigation will be ready for internal review in May of 1996. This information will be included in the Risk Data Sheet.

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No.	Originator	Item (RDS #, Work Pkg Title, etc.)	Comment	Response
34	ORREMSSAB	Project Management	<p>-Page 130 (R960003). "K-25 Mixed Waste Treatment and Disposal" states "all project management is included in this activity." We find this consistent with the concept of project budgeting, but question whether this is done consistently across all projects in the budget.</p>	<p>Some project management is included in all of the projects whether it is specifically designated or not, but may not be all inclusive for certain management and technical support multi-project support activities.</p>
35	ORREMSSAB	Project Scope	<p>-Page 131 (R96Q0006 and R96Q0002). Both of these project scopes as written appear to relate to the High Ranking Facilities Project. We believe the project scope for R96Q0006 should read "Isotope Facility", not "High Ranking."</p>	<p>The scope for R96Q0006 will be modified to read the "Isotope Facility Deactivation Project" rather than the "High Ranking project."</p>
36	ORREMSSAB	Funding Limits	<p>The ORREMSSAB finds that the amount of money anticipated for FY98 EM work would be inadequate to perform the tasks required. We also believe that ORO has returned unspent funds to DOE-HQ each of the past few years. We believe strong actions need to be implemented to prevent loss of needed funds in the future. Otherwise, we find little to comment on regarding the relative ranking of the listed projects. However, we repeat that the presentation and lack of availability of data prevented a definitive assessment. We reviewed the integrated priority list against those criteria which are most compelling (e.g., fixed costs for administration, surveillance and monitoring, maintenance, waste treatment, storage and disposal; compliance; and other desirable activities.)</p>	<p>DOE Headquarters (DOE-HQ) determines the distribution of funds to the DOE field offices. Of course, DOE-ORO requests funds from DOE-HQ; however, DOE-HQ makes the ultimate decision in field office allocation after Congress has appropriated the funds to DOE. Given the limited funds, DOE has devised the Management Evaluation Process to assist in the best distribution of funds. ORO will use this as one of many tools to maximize the effectiveness of limited resources.</p> <p>DOE will be making every effort to obtain public participation earlier in the prioritization process. The materials were prepared as soon as the information was available and distributed to the public. Additional stakeholder meetings will be scheduled once updated information is available.</p>

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No.	Originator	Item (RDS #, Work Pkg Title, etc.)	Comment	Response
37	ORREMSSAB	Funding Limits	We found that within an expected budget cut-off of \$650M, about 52 percent of the funding goes to fixed cost activities, about 23 percent to compliance projects, and about 22 percent to other desirable projects. The remaining three (3) percent is for projects that data were unavailable in the project scope list. Thus, there is little room for giving high priority to additional items.	One of the important considerations of the Prioritizations Board is to fund projects that will reduce the amount of structures and acreage requiring ongoing surveillance and maintenance.
38	ORREMSSAB	Unfunded Projects	<p>While we recognize the priority of and need for the tasks which were ranked above the target budget of \$650M, we have a concern that there is not more actual cleanup activity planned for FY 98, (i.e., there is less "moving of dirt" than we would desire.) Specific projects which at this point appear to be below the anticipated budget cut-off and which we feel should be undertaken are:</p> <p>Those which have strong regulatory drivers or which have been specified in the FFA; and</p> <p>The activities at David Witherspoon and Atomic City Auto Parts. These should be expedited and completed. There are perceptions of equity and fairness involved in these projects, as well as a need to demonstrate DOE commitment to complete a task once initiated.</p>	<p>In the past five years, the proportion of projects in cleanup versus assessment status has greatly increased. DOE is continuing to place emphasis on cleanup results.</p> <p>David Witherspoon Inc. and Atomic City Auto Parts would both be funded at the target budget for FY98. However, these projects would not be funded at decrement level.</p>

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No.	Originator	Item (RDS #, Work Pkg Title, etc.)	Comment	Response
39	ORREMSSAB	Emergency Funds	<p>Our review of the projects within the \$650M cut-off also raises the question of how DOE presently funds unanticipated situations related to environmental restoration and waste management. Is there a reallocation of the \$650M to cover emergencies so that the lower ranking projects are delayed or is the total budget adjusted and the prioritization process reinitiated? Such contingencies should be explained in the prioritization process methodology. We believe that DOE should develop a systematic approach to the funding of unexpected situations.</p>	<p>Management of environmental projects is a dynamic process that requires frequent adjustment to the annual project scopes, schedules, and resource allocations. The baseline change control process governs these changes. Each year as the prioritization of projects is refined and revisited, new emerging work and project changes are factored into the list. The prioritization list and the baseline are then made consistent.</p>