



AK RIDGE RESERVATION

E n v i r o n m e n t a l M a n a g e m e n t

April 7, 1998

Mr. Rod Nelson
Assistant Manager for Environmental Management
DOE/ORO
P.O. Box 2001
Oak Ridge, TN 37831

Dear Mr. Nelson:

The February 1998 draft "Accelerating Cleanup Paths to Closure" was reviewed by the Budget and Prioritization Team of the Oak Ridge Reservation Environmental Management Site Specific Advisory Board (ORREMSSAB). The attached general and specific comments on the document were approved by the ORREMSSAB at its April 1, 1998 meeting.

Although the comments appear extensive, the goal of the reviewers was to help the Department of Energy Environmental Management Program provide the interested public with an understandable planning document for remediation of contaminated areas. We realize how difficult it is for those actively involved in such a multifaceted program to produce an integrated document, particularly when milestones and budgets are continually changing.

The comments are both substantive and editorial. The substantive comments draw attention to the content of the document. The editorial comments simplify and/or clarify ideas and sentences. In addition, a mark up of the document is enclosed; please use it in conjunction with the attached general and specific comments.

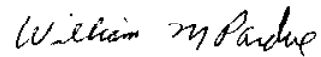
If there are questions about the comments, please contact Lorene Sigal, Budget and Prioritization Project Team Leader, telephone 482-4125.

Mr. Rod Nelson
April 7, 1998

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Thank you for your continued support of the ORREMSSAB

Sincerely,



William M. Pardue, chair

WMP/sb

Enclosure

cc: Barbara Brower, DOE/ORO
Marianne Heiskell, DOE/ORO
Karol Hazard, DOE/HQ
John Hankinson, USEPA Region IV
Earl Leming, TDEC
Susan Gawarecki, LOC
ORREMSSAB Members



**GENERAL COMMENTS ON THE
ACCELERATING CLEANUP PATHS TO CLOSURE
February 1998**

- Paths to Closure must be written to be understandable by an interested stakeholder. Greater care is needed with acronyms and abbreviations.
- Tables and figures should be self explanatory to facilitate their use out of context.
- Avoid use of jargon (e.g., outsourcing, scope)
- Consider discussion of institutional controls/stewardship where appropriate in Paths to Closure. Since stakeholder end use recommendations include leaving some wastes in place, the issue of stewardship/institutional controls is paramount. DOE must come to terms with this issue as it develops its watershed strategy. Furthermore, the State has gone on record in regard to DOE's plans for stewardship/institutional controls. In addition, DOE should say something about the fact that some contaminants remaining in place will be radioactive/hazardous beyond 2070. DOE must be prepared to respond to stakeholders on these issues at the public meeting scheduled for Mid-April.
- The waste management assumptions in Appendix A should be revised for clarity, particularly parts III. A., B., and C.
- The City of Oak Ridge is very sensitive about the fact that most of the ORR is within the City boundaries. Can the maps in Appendices B and C be improved to clearly reflect this condition?
- The maps in Appendices B and C for the ORR must be revised and improved. They are misleading. Please see specific comments.
- Although Appendix D "EM Program Subprojects Scopes" was not reviewed, project managers should review the text to ensure it is representative of current plans.
- The text in Appendix G that accompanies the OR waste and material disposition maps should be reviewed for clarity and rewritten. Text for all disposition maps should follow a similar pattern and the level of detail should be similar throughout. A single author might reduce the disparities. Please ensure that acronyms/abbreviations are spelled out the first time used and also included in the list of abbreviations on page ix.
- The prioritized list of subprojects in Appendix H does not match the 2/19/98 ranking list. Please ensure that the final iteration of Paths to Closure has the most current prioritization list.

**Specific Comments on the
Accelerating Cleanup Paths to Closure
February 1998**

Page	Paragraph	Comment
xi	1 st	Delete "accelerating" since there is no reference against which the "acceleration" can be compared.
	2 nd	Find other descriptor (e.g., projects, activities) for "new scope." It is jargon.
	3 rd	Does this include reindustrialization?
	After 3 rd	Add descriptions of EM-30, EM-40, and EM-60
	11 th	Spell out nCi/g someplace, either following abbreviation or in the abbreviation section
xiii	1 st	Change second sentence to read "The name was changed in response to . . ."
	2 nd	Reference to the rivers that have been contaminated - sounds as if it is all DOE's fault - rewrite; see also on pages 2-5 and 4-2
	2 nd	Last sentence, no explanation of how Paducah relates to Oak Ridge which is the topic of balance of paragraph.
	4 th	Delete "for sustainment" - poor use of words and unnecessary
	4 th	Last sentence, "centerpiece" - this is an overly optimistic statement
xiv	3 rd	Delete "efficiencies" after "surveillance and maintenance"; insert "decreased" or "reduced" in front of "surveillance and maintenance"
	Last heading	Change "documents" to "document is"
	7 th	Add "s" to action" in next to last line
xv	3 rd Bullet	This doesn't seem consistent with the Glossary, page xi

Page	Paragraph	Comment
xvi	1 st	Under Compliance, 2 nd sentence, delete “achievement of compliance at the”
	2 nd	What does this mean?
	4 th	Second line, “... funding <u>from</u> ” sounds better
	5 th	See suggested revision in document
xviii	Table ES.2	Future use assumptions for ORNL, ETTP, and Y-12 do not agree with End Use Working Group’s future use recommendations. Note: Y-12 and ETTP recommendations are in progress and will be completed by the time <i>Paths to Closure</i> is finalized.
	1 st	Add “d” to “enhance”
	1 st	Second sentence, insert “annual” before enhanced
	Bullets 2 & 3	Can you find a better word(s) - “outsourcing” is jargon!
	Bullet 5	Use of “subcontractors to provide support (e.g., health and safety)” will raise the hackles of some stakeholders! See also page 4-7.
	Bullet 6	Not clear
xix	Bullet 2	Does not make sense “. . . before remediation on D&D and escalation”
	Bullet 2	Last part of sentence, beginning with “surveillance and maintenance...” is not clear
	Bullet 5	What is “cost reduction support?”
	1 st	Bullets 2 & 3, what are these?
	Last	Replace “This documents the culmination of . . .” with “Paths to Closure is . . .”
1-1	1 st	See suggested change for page xiii, first paragraph
	3 rd	Last two sentences are a good description of the “life cycle effort”
	5 th	Second sentence, change “scope is” to “activities are” - “scope” is jargon and meaningless to the lay reader.

Page	Paragraph	Comment
1-1	5 th	Fourth sentence, delete "that constitute the specific, individual locations."
1-4	Bullet 2	Is this for all three plants with UF ₆ and consistent with EIS?
	Bullets 3&4	Confusing
	3 rd	
	Section 1.3.2	Second sentence, Did "uranium enrichment" continue to 1993?
1-8	4 th	The planning, including costs, for institutional controls must extend beyond 2070 if wastes remain in place.
	Section 1.7.2	See comment for page 3-8. Suggest you incorporate paragraph 3, page 3-8 here.
	Section 1.7.3	Please provide additional information on length of delays. Please modify Table 1.2 to show original completion data and delayed completion date. How much will declining budgets affect delays? Please provide estimate.
1-9	1 st	Suggest rewrite.
	2 nd	Last sentence revised to read "The Paths to Closure is a living document that will be revised annually to reflect the life cycle baseline." This document begs the question of how the ORO share of the total \$5.75B annual EM budget for DOE is determined.
2-1	1 st	
	Section 2.1	First sentence, what does "Following the confirmation of a release ..." mean?
	2 nd	Second through fifth sentences, suggested revision, "The end use categories described in Table 2.2 are used for purposes of the life cycle baseline. Once an end use is identified, human health and environmental risk assessments are used to determine acceptable cleanup levels. These risk-based levels are the basis for selecting remedial actions." Appendix B . . .
	3 rd	First sentence, "Following remediation, the end state of the Oak Ridge Reservation is estimated to be"

Page	Paragraph	Comment
2-1	3 rd	Third and fourth sentences, "The Site Specific Advisory Board convened the End Use Working Group to develop end use recommendations to guide . . . Actual end states will be identified in watershed or . . ."
2-2 & 2-3	Table 2.1	<p>Revise table to reflect current decisions.</p> <ul style="list-style-type: none"> • Use of ISV for disposal pits and trenches (see also page A-8. Some stakeholders question use of ISV.) • Where are the mercury-contaminated soils in Bethel Valley? • Surface impoundment sediments isolated in a consolidation cell?? I thought the proposed plan said removal! • Long-term stewardship has more requirements/activities than listed in Table 2.1 (e.g., recordkeeping, access, education, research). • Page 1-8 says, the period of institutional controls has been extended to 2070. This table says 22 years (FY 2020). Reconcile times and dates throughout document. Also define "institutional controls" and "long-term stewardship" and ensure consistent use throughout. • <u>Section Bethel Valley D&D</u>, "The Oak Ridge National Laboratory Graphite Reactor will be preserved as a national landmark" is redundant. • Bullet 4 is redundant.
2-7	GOOD STEWARDSHIP WRITE UP!	
	4 th	<p>First sentence "The End Use Working Group and the Friends of Oak Ridge National Laboratory have . . ."</p> <p>Why is "Strategy" in Section 3? Parts of it sound as if they should be up front.</p>
3-1	Section 3.1.1	"Vision. Revitalization of scientific infrastructure at ORNL." What does this mean, what is wrong with it now?
3-2		Add a bullet to the list at the top of the page "- establish stewardship programs for sites where wastes remain in place." Punctuate previous bullets appropriately.
3-2	Bullet 1	DOE-ORO can't do this alone.

Page	Paragraph	Comment
3-8	3 rd	This paragraph explains my question marks on page 1-8 in Section 1.7.2 about removal of the assumption "...return of waste management responsibility to the generators. . . ." Suggest you incorporate this in Section 1.7.2.
3-8	3 rd	Second sentence, "through 2070" and 3 rd sentence, "After 2013" - are these contradictions?
3-11	4 th	Fifth line from the bottom, what/where is "Table 0.9.1 of the site summary level . . . " ?
3-12	1 st	Middle of paragraph "Table 0.9.2 of the site summary level . . . "
	3 rd	Spell out abbreviations here or in the abbreviation section.
	4 th	"Table 0.9.3 of the site summary level"
	5 th	Third sentence, insert "Site Specific Advisory" in front of "Board"
3-13	Table 3.1.	Spell out RA here or in the abbreviation section or use footnotes to the table for RA, D&D, WAG, and DNAPL. My preference is that a table or a figure should be able to stand alone since they are often used out of context.
3-15	Section 3.6.2	First bullet on use of the TSCA incinerator is in jeopardy given the State's attitude on importing wastes.
	Bullet 2	"Oak Ridge capabilities available to other DOE sites. Oak Ridge lead site for National scrap metal reuse/recycle program" Will State regulators buy into this? What commitment do we have from other sites to date or in the works?
	Last bullet	Explain why Oak Ridge is chosen site (it has 80% of the waste) - - how will it be reused - will regulators accept off site waste.
3-16	Section 3.7	If applicable, is the potential cost for long-term institutional control/stewardship factored into the mortgage reduction methodology? If not, it should be. If not applicable to a particular case, it should be so stated.

Page	Paragraph	Comment
3-17	Section 3.8.1.	“Contracting Strategy.” Public participation is being encouraged in all other aspects of the clean up. Will the SSAB or public be allowed or encouraged to give input on review of contractor performance objectives relating to fee awards? OR Any public input to determination of M&I Contractor fees for performance?
3-18	3 rd	Is there a mechanism/plan/procedure for existing subcontractors to retain staff during the change to the M&I and the competition for subcontracts? Please address this issue in the document.
3-19	item 1.	Spell out “m ³ ” here or in the abbreviation section.
	item 2.	“RCRA hazardous waste” into the onsite waste management facility? Is this issue resolved? Please clarify in the document. “TSCA waste”; document states elsewhere that TSCA incinerator waste would be returned to generator. Not clear what is meant here. Please clarify.
4-1	1 st	If applicable, need to include institutional control/stewardship into the life cycle baseline of projects/subprojects.
	Section 4.3	Fifth line, change “criteria” which is plural to the singular “criterion” Add “Site Specific Advisory Board members” to the list of ex-officio members.
4-2	Section 4.5	Please address institutional controls/stewardship costs in paragraph two. If DOE does not want to include such costs, it must explain: (1) why not, (2) how such costs will be managed, and (3) who is/will be responsible for the costs.
4-3	4 th	What is “level 6”? Not clear to the reader.
4-4	Figure 4.1	Finally see the note to Figure 4.1 that gives the first clue to annual institutional control/stewardship costs through 2070. Given the current interest in the issue by stakeholders, I believe DOE should be more “upfront” with the plans, management, and costs for an institutional controls/stewardship program for the Oak Ridge Reservation.

Page	Paragraph	Comment
4-5		“DOE-ORO Risk reduction score table.” ETTP and Y-12 scores drop off significantly over the next several years as opposed to ORNL. Why is this? Prioritization and sequencing ranking of projects?
4-7	Bullets 8, 9, 11, and 14	See comments for page xviii
4-8	2 nd	Middle of paragraph, more “outsourcing”!! “Decreased landlord costs at ETTP, reduction in general use facilities and utility systems.” Clarify on utility systems. Is it related to removal of specific buildings or general reduction of utility systems?
4-9	Figure 4-4	“ACP” should be changed to Paths to Closure (two places). Once again it would be helpful to the reader and those who might want to use this figure if the abbreviations were spelled out in footnotes or in the title of the figure. At least, ensure that BEMR, ACP, PAD, PORT, GDPs, GCEP, STUs, D&S, and WSSRAP are spelled out in the abbreviation table.
5-1	2 nd	Second line, “... funding <u>from</u> ...” sounds better. (I bet the managers of such programs are delighted to hear this not once, but twice. See page xvi.)
5-3	Section 5.2	The line between NEPA assessment and CERCLA for the onsite waste management facility is probably not settled/drawn as far as some stakeholders are concerned. The third sentence may give such stakeholders additional “ammunition” for their cause. Perhaps DOE could revise this sentence to briefly explain why the onsite waste management facility is a CERCLA project and not a project subject to NEPA review and documentation.
	Section 5-3	The ORREMSSAB requests a stakeholder seat on the ORR Natural Resource Trustee Council. Provide more information about the Council’s role and report. SSAB or EUWG might benefit from participation on the Council.
6-1	2 nd	Fourth and fifth sentences, “As issues are resolved, Paths to Closure and subsequent documents will be modified.” Delete last sentence; it is redundant.

Page	Paragraph	Comment
6-2	Last paragraph	Suggested rewrite. Original paragraph is not accurate. "The Budget and Prioritization Team of the Oak Ridge Reservation Site Specific Advisory Board is dedicated to understanding DOE's prioritization and budgeting systems. This includes learning about . . . This group will gain an understanding of how DOE plans on making the most of its shrinking pool of funds, and will provide advice and recommendations to the DOE-ORO EM Program through the Site Specific Advisory Board."
6-2	Last paragraph	DOE has been responsive to the public's need for input into this process and we commend them. Please continue the process so that the public may assess and comment at the earliest opportunity.
Appendix A		
A-4	item A	The last sentence is not clear. What is meant by "provided"? Is "land" given to the private sector or is it provided for use during the term of the lease? Please clarify.
A-5	item J	These budget targets do not agree with current estimates. Please revise and include a date (e.g., The February 4, 1998 budget targets are as follows:).
A-6	C.	ORR Assumptions. The waste management facility (waste cell - Bear Creek Valley?) Please clarify what types of waste and from where and from what activities.
A-7	E.	Remedial investigation. What are "data quality objectives"?
A-7	item f	"No Further Action (NFA) decisions are made as part of the five major RODs." Unclear what is meant. Please revise.
	item h, no. 1	Why is the portion of contaminated groundwater in the sumps and drains expected to increase? Please explain. "The federal government acknowledges its responsibility for these activities in perpetuity." These are nice words but stakeholders will want to know more - where written, who ensures, who funds, who oversees. In other words, does DOE have a plan/program?
A-8	item h, no. 7	There are stakeholders with a consuming interest in criticality risks on the Reservation. The ORREMSSAB suggests that you provide more information (e.g., Where are these deposits? What is the status of the risk? Who will do the work? Have there been any criticality events in the buildings?)

Page	Paragraph	Comment
A-8	item h. no. 7	What will be done with uranium deposits? How much? Is this a major or minor task? You probably should say something about the group that oversees criticality risk on the Reservation.
	item i. no. 4	Although can not find the page, believe it was said the Graphite Reactor will be maintained as an historic landmark. What is meant by decommissioning it? Please clarify.
A-8	item i. no. 7	Not yet accepted "with in situ vitrification."
A-9	item i. no. 8	The subsurface grout sheets will require stewardship/institutional controls for a very long time. Perhaps you should say so here to help waylay comments.
	item l. no. 9	Why "left in place"?
A-9	item j. no. 6	Change "The sources of contaminated..." to "The sources that contribute to contaminated..."
A-10	item 3, no. b	Revise to read "The area of the Oak Ridge Reservation subject to CERCLA is reduced by 85% by the end of FY 2000."
A-14	III. A. 1.	Unclear. Are you talking about waste volumes, waste costs. Please rewrite sentence.
	III. B. 3.	Unless you mean "treated and dispositioned", the final phrase about "no residues" being returned is unnecessary.
A-15	III. B. 4.	What are "burden-of-proof schedule requirements"? Are they described elsewhere in the document; if so, please give reference.
	III. B. 5.	How can funding for " <u>nonmixed</u> " waste be "... provided by the <u>Mixed</u> Waste Type Project." ? Please revise sentence to clarify.
	III. B. 7.	This is a politically sensitive issue since according to the State, the 1998 burn plan for the TSCA incinerator (which the State rejected; see the Oak Ridger, March 11, 1998) grants permission for out-of-state sites to ship waste to Tennessee. Thus, it appears that this statement does not agree with the 1998 burn plan. Please resolve because when these kinds of important issues are at cross-purposes, DOE loses credibility quickly. (See also item C.13. on page A-16)

Page	Paragraph	Comment
	III. C. 1.	Insert "storage" in front of "operations" at the end of line one. Would help to add "MLLW waste storage will be consolidated at ETTP."
	III. C. 2.	Last sentence, "at all three sites" is unclear change to "at the X-10, Y-12, and ETTP".
	III. C. 6.	Last sentence is unclear. Please revise.
	III. C.7	"documentto" should be "document to"
A-16	III. C. 10.	Would help to give a few examples of what the projection includes (e.g., solid wastes, sludges, ???).
	III. C. 11.	Where is the "small fraction of the current storage capacity needed"? at ORNL, Y-12, ETTP?
	III. C. 13.	See comment for item III. B. 7. on page A-15. These items must agree with each other and with any related statements in the document.
A-17	III. D. 10.	The nature of the "Mixed Waste Type Project" is unclear. (see comment for item III. B. 5.). Can you resolve this so the reader understands why this project funds so many different activities?
A-18	III. E. 11.	Add "storage or disposition on" to first sentence because out-of-state TRU waste may be targeted for treatment on the ORR.
Appendix B		<p>ORR Current Use</p> <p>It is not clear that the ORR is mostly within the boundary of the City of Oak Ridge. Suggest you change "City of Oak Ridge" title in upper middle of maps to "Oak Ridge Residential area", and somehow unscramble the City of Oak Ridge Boundary and the DOE-Owned Boundary. This also applies to the ORR Maps in Appendix C.</p>

Page	Paragraph	Comment
Appendix C		
		ORR Current State Environmental Remediation This map is misleading! It looks as if most of the ORR is the responsibility of EM and that remediation is required but not complete on almost the entire ORR. I think you are trying to show that most of the ORR is currently a NPL site, and the next map is showing the hoped for 85% reduction, and the next map is a future end state when EM has completed its tasks. Somehow you must clarify the message of the maps in the titles. Furthermore, there will continue to be use restrictions for many of the EM sites well into the future because wastes will remain in place. Your end state map should show such restricted areas and not mislead the public into thinking they will be able to freely roam the Reservation at some time in the future.
Appendix D		
		The "EM Program Subproject Scopes" was not reviewed. However, it was called to our attention that item 1.X.06.10.01.12 suggests that in situ vitrification will be used in the pits and trenches in Melton Valley. Please revise if this text is in error.
Appendix E		
E-3	1 st	See editorial changes on document.
	Bullet 3	Add description of EM-50 to third bullet. Also add to Glossary on page xi.
	Last bullet	Unclear statement. Be more specific about <u>who</u> is doing <u>what</u> to <u>whom</u> .
E-4		Please see editorial comments for the section "Barriers to Implementation".
Appendix F		
		What do the numbers in parenthesis mean (e.g., [1,3,1])? Please describe in title or in footnote.
Appendix G		
		Impossible to read information in some of the black blocks. Too many unknown abbreviations/acronyms.
G-21	1 st	See editorial changes to clarify this paragraph.
	4 th	Is it certain that Envirocare can accept the waste?
	3 rd & 5 th	These paragraphs are confusing. Please revise.
	6 th & 7 th	Please revise.

Appendix H

Ranking of subprojects does not match the 2/19/98 ranking list. Please ensure that the most current list is included in the final iteration of Paths of Closure.

Appendix I

The ORREMSSAB Budget and Prioritization Team reviewed the Stakeholder Issues/Action Plans (particularly the Resolution Approach and Stakeholder Involvement parts) and is providing the following evaluation of DOE's actions. Specific comments are found in the accompanying table.

- As applicable, the action plans should be updated to reflect current information and decisions.
- The DOE must soon come to agreement with the State on issues (raised by the State) that are roadblocks to remediation and waste management on the Oak Ridge Reservation (e.g., institutional controls, interim RODs, excavation of uranium.)
- Items that are the responsibility of DOE-HQ can not be resolved by DOE-ORO; however, it is important that DOE-ORO understands stakeholder concerns and factors them into its negotiations with Headquarters.

Evaluation of the Status of Stakeholder Issues/Action Plans in Appendix I

<u>Issue number</u>	<u>Status¹</u>	<u>Comments</u>
OR-1-97	+	<ul style="list-style-type: none"> • Resolved to the satisfaction of interested stakeholders. EM deserves compliments.
OR-2-97	0	<ul style="list-style-type: none"> • No apparent progress at HQ on the questions of planning and funding for activities/facilities that presently are not the responsibility of EM but may become EM responsibilities in the future.
OR-3-97	-	<ul style="list-style-type: none"> • This action plan should be updated. The issues of reduction of environmental liability and diversion of resources from higher risk activities are not addressed satisfactorily.
OR-4-97	-	<ul style="list-style-type: none"> • Although DOE may be doing everything it believes is necessary for reindustrialization at EITP, some stakeholders continue to be dissatisfied with levels of contamination, worker safety. CROET's approach to leasing, and the adequacy of the NEPA EA. The DOE must try to resolve such issues during the CERCLA process leading to the ROD.
OR-5-97	-	<ul style="list-style-type: none"> • Unresolved. An important issue is the preparation of "other CERCLA decision documents . . . in addition to watershed RODs." What are the effects on scheduling and funding?
OR-6-97	+	<ul style="list-style-type: none"> • Interested stakeholders are satisfied with DOE's process for estimating costs of environmental remediation and waste management. But as always, estimates are subject to change. As long as DOE continues to inform and involve stakeholders, confidence should remain high.

¹ +, resolved; -, unresolved; 0, Headquarters initiative.

- OR-7-97 - • As long as institutional controls, if needed, are planned for within the CERCLA process and included in the RODs, we see no need for NEPA review. Addressing Reservation-wide institutional control under NEPA would be time consuming and costly. For greater benefits would result from devoting such time and money to the development of an institutional control/stewardship program/plan.
- OR-8-97 + • The State and DOE must come to agreement on this issue. Many stakeholders support the facility and want no more delays.
- OR-9-97 - • Unresolved. The State and DOE must work together to resolve problems associated with movement of wastes to and from the ORR. The Governor's panel determined the use of the TSCA incinerator was safe.
- OR-10-97 0 • HQ is responsible for the National Action Plan and Dialogue. This is not really a local issue.
- OR-11-97 - • See comment for OR-9-97.
- OR-12-97 + • Appears to be resolved. However, the ORREMSSAB believes a stakeholder (s) should be appointed to the ORR Trustee Council.
- OR-13-97 + • Resolved. See page 3-8.
- OR-14-97 - • Unclear what this is all about. Please revise, update, and rewrite.
- OR-15-97 + • Resolved.
- OR-16-97 + • The schedule for watershed RODs is ambitious and may suffer some delays along the way. Nevertheless, stakeholders, EPA, and the State must work together with DOE to expeditiously complete the CERCLA process so that remediation can proceed.
- OR-17-97 + • Resolved. DOE agrees to collect additional data if DOE, EPA, and the State decide they are necessary.

- | | | |
|----------|---|---|
| OR-18-97 | + | <ul style="list-style-type: none"> • Resolved. However, stakeholders may continue to ask why the onsite waste management will not/cannot be designed to accept RCRA waste as well as CERCLA waste. |
| OR-19-97 | 0 | <ul style="list-style-type: none"> • HQ is responsible for plans related to disposal of non-defense TRU waste and determination of the waste acceptance criteria for WIPP. |
| OR-20-97 | - | <ul style="list-style-type: none"> • Appears unresolved until the Melton Valley Watershed CERCLA process is completed. |
| OR-21-97 | - | <ul style="list-style-type: none"> • Unresolved |
| OR-22-97 | 0 | <ul style="list-style-type: none"> • The targets for enhanced performance and productivity improvements are program goals. Stakeholders may consider them unrealistic but we also should encourage DOE to try to reach the goals. We ask that DOE honestly evaluate its progress toward reaching the targets and report to the public. |