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November 2, 2007

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Olympia, WA 98504-7600

Elin Miller, Regional Administrator
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue
Seattle, WA 98101

Re: Clarity and Readability of Agency Reports

Dear Messrs. Brockman, Manning, and Ms. Olinger and Miller,

Background

The U.S. Department of Energy (DOE), its contractors, and the regulatory agencies have issued large documents (risk assessments, feasibility studies, and environmental impact statements) which are then made publicly available. Comments from stakeholders and the public are solicited, with comment resolutions inserted into the final drafts of the documents. This procedure is an important part of the agency-public involvement process and aids the public understanding of DOE's proposed actions.

Because of the size of these documents, it is essential that the principal conclusions be clearly presented in the Executive Summary. Based on a reading of the Executive Summary, a reader can then decide whether or not the conclusions and recommendations are suitable and sensible. Or, the reader may decide to delve into the detailed analyses and data bases that support the report's conclusions.

HAB Consensus Advice #202
Subject: Clarity and Readability of Agency Reports
Adopted: November 2, 2007
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A problem faced by readers of the Executive Summaries of many of DOE's large documents is that the key results and conclusions are not presented at all or are presented in a confusing manner. Often the Executive Summary consists of sections of text extracted from the various chapters of the detailed analyses. As a result, the meaningful conclusions are often lost, if present at all.

Another problem is the practice of stacking all referenced figures and tables at the end of the text in a chapter. This practice forces the reader to search through numerous pages of tables and figures to find the one he is reading about at a given point in the text. This problem is exacerbated if the reader reads the document on-line.

Some reports rely heavily on information contained in other documents to support the analyses and conclusions presented in the report. These supporting documents are often difficult for the serious reader to obtain, thus making it difficult or impossible for the reader to confirm the applicability of the referenced information.

Advice

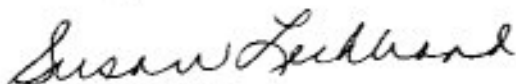
To assure that quality Executive Summaries are produced for these documents, the Hanford Advisory Board recommends the following:

- DOE should establish a standard template that includes a brief introduction that identifies the bases (technical/regulatory/programmatic) for preparing the report, a concise statement of the problem(s) being examined, conclusions reached, the impact of those conclusions on future decisions, and, if appropriate, an indication of what action(s) should be taken in response to these conclusions. To the extent possible, the results should be presented in tabular or graphic form, with only minimal text as required to explain important aspects of the information in the tables and graphics. Where more detailed discussions are needed to support the conclusions, the summary should reference the appropriate locations in the body of the report.
- Professional technical writers and editors should be used to assist in creating the Executive Summary to ensure it will enable non-technical readers to understand the subject matter.
- In printed versions of a report, each figure and table in a given chapter should be placed in the text of the chapter immediately following its

discussion. The same approach should be employed in the construction of any appendices to the report. Online versions of a report should contain simple methods to provide figures and tables to the reader at their points of reference in the text.

- References to separate documents should include, when available, online addresses where the referenced documents can be viewed.

Sincerely,



Susan Leckband, Chair
Hanford Advisory Board

This advice represents HAB consensus for this specific topic. It should not be taken out of context to extrapolate Board agreement on other subject matters.

cc: Doug Shoop, Co-Deputy Designated Federal Official, U.S. Department of Energy, Richland Operations Office
Nick Ceto, Environmental Protection Agency
Jane Hedges, Washington State Department of Ecology
Doug Frost, U.S. Department of Energy Headquarters
The Oregon and Washington Congressional Delegations