



*Many Voices Working for the Community*

# Oak Ridge Site Specific Advisory Board

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February 14, 2002

Mr. Gregory Sullivan, EM-51  
U.S. Department of Energy  
1000 Independence Avenue SW  
Washington, DC 20585

## **DOE HQ Long-Term Stewardship Strategic Plan dated December 7, 2001**

Dear Mr. Sullivan:

The Oak Ridge Site Specific Advisory Board at its February 13, 2002, Board meeting endorsed the enclosed comments, previously submitted by members of the public in order to meet the January 29<sup>th</sup> deadline, on the draft Department of Energy HQ's *Long-Term Stewardship Strategic Plan* dated December 7, 2001. Overall, we were pleased with the plan, and the degree to which it encompassed the many stewardship issues we have raised over the years.

Oak Ridge stakeholders have been involved in long-term stewardship at Oak Ridge since 1997 when the first stakeholder stewardship committee was formed. Two major reports on stewardship have been published to date and area stakeholders continue to advocate for effective long-term stewardship by participating on the ORSSAB Stewardship Committee.

We are encouraged that the strong commitment to stewardship expressed in the document will shape future departmental policy and guidance.

Sincerely,

A handwritten signature in cursive script that reads "Luther V. Gibson, Jr.".

Luther V. Gibson, Jr.  
Chair

Enclosure

Cc: Martha Crosland, DOE/HQ, EM-22  
Lori Fritz, DOE/ORO, EM-90  
Dave Geiser, DOE/HQ, EM-51  
Pat Halsey, DOE/ORO, EM-90  
Connie Jones, EPA Region 4  
John Owsley, TDEC  
Jessie Roberson, DOE/HQ, EM-1  
Ralph Skinner, DOE/ORO, EM-90

January 25, 2002

Gregory Sullivan, EM-51  
US Department of Energy  
1000 Independence Avenue SW  
Washington, DC 20585

Dear Mr. Sullivan:

As the Oak Ridge area stakeholders most active in DOE long term stewardship activities, we want to thank you for the opportunity to review and comment on the pre-decisional draft of the Department of Energy Long Term Stewardship Strategic Plan. Oak Ridge stakeholders have been heavily involved in long-term stewardship at Oak Ridge since the first stakeholder stewardship committee was formed as part of the Oak Ridge End Use Working Group in 1997. This evolving group of stakeholders has produced two major reports on stewardship to date and continues to advocate for effective long term stewardship through the Stewardship Committee of the Oak Ridge Site Specific Advisory Board (ORSSAB). Numerous stakeholders participate on the ORSSAB committee including current and former members of the ORSSAB, representatives of other area community groups and other area residents. We are writing to you today as individuals in order to meet your comment deadline. In addition, the ORSSAB will be considering formal comments at its February meeting.

Overall, we were pleased with the plan, and the degree to which it encompassed the many stewardship issues we have raised over the years. We are hopeful that the strong commitment to stewardship expressed in the document will shape future departmental policy and guidance. In particular, we strongly support and look forward to DOE's plans to address the following key stewardship needs:

- the need to ensure DOE's strong commitment to and acceptance of the responsibility for long term stewardship
- the need to provide site-specific and long term flexibility in designing and implementing long term stewardship
- the need to pursue and understand alternative funding mechanisms
- the need to develop and implement departmental policies and guidance for long term stewardship
- the need to incorporate long term stewardship into all departmental planning and policies including the DOE mission statement
- the need to integrate long term stewardship into all remediation decision making
- the need to make long term stewardship a part of individual job responsibility and performance measures
- the need to involve stakeholders at all levels of planning and implementation
- the need to plan for the inter-generational nature of long term stewardship
- the need to quantify costs of long term stewardship and conduct life cycle cost estimates
- the need to build long term stewardship considerations into the planning of new activities
- the need to clearly identify long term stewardship roles and responsibilities
- the need to understand and create response capability for remedy failures
- the need to develop appropriate information management systems
- the need to conduct meaningful long term stewardship research.

In addition, we recognize a number of issues that require additional clarification or development to ensure appropriate application to long term stewardship. These include:

- The plan needs to clarify and strengthen the focus of long term stewardship on contaminated lands. Some of the language in the report suggests that long term stewardship extends beyond care for contaminated lands to issues such as reducing DOE's footprint and broader worker health and safety

issues. While these issues are certainly important, we are concerned that the scope of this report may be too large and confuse real issues of long term stewardship. It is already difficult to define long term stewardship; making it too much of a “catch-all” will only further complicate and distract from the core issue of long term protection of human health and the environment.

- Cleanup is a misleading term, we prefer to use the term “remediation.”
- Item 2.6.2 and similar statements are not functions of long term stewardship but of remedial decision-making and should not be included in the scope of this document.
- On the potential impact of external factors on page 6, we suggest wording be rearranged to suggest setting up buffer zones before population changes make them both imperative and difficult to arrange. One can always withdraw a buffer boundary.
- Relative to strategy 1.3.5, the art and science of stewardship may not be ready for standards development, though a careful effort might clarify that status.
- Discussion of funding does not delineate the unsatisfactory aspects of the dependence on annual budget cycles for stewardship. It would help if trust funds were mentioned as a possible solution.
- While the importance of stakeholder and local involvement is noted in the principles, it is identified too infrequently in the body of the report. The long term success of long term stewardship will rest firmly in local knowledge, authority, and responsibility and the strategic plan needs to recognize this more effectively.
- The plan needs to increase the emphasis on the need for effective information systems, proper identification and organization of information, and public access to information at the local level.
- The relation of stewardship to natural and cultural resources might best be handled in a section on intersecting management areas, rather than as a part of departmental stewardship of contaminated areas. Of course, generalized stewardship concepts are involved in maintaining cultural resources, but does one want also to include “stockpile stewardship?”
- Under Objective 1.6, Potential Measures for information management look both demanding and too slow. Measures to capture essential information are needed in 2002. Management information systems" could be confused with "information management systems" which include rules for saving file space and the routine, planned destruction of information.
- Where transfer of contaminated sites is considered, the document seems far too optimistic that future stewardship responsibilities will still be provided. For example, if deed restrictions are being considered to assure maintenance of institutional controls, a strategy must be developed to assure uniform enforcement of such restrictions by DOE--otherwise they are likely to be held non-binding. Specific strategies for maintaining stewardship accountability in the transfer of contaminated sites should be included in the Strategic Plan.
- Add “public stakeholders” to item 3.1.1.
- Objective 3.3 should focus on bona-fide long term stewardship needs. 3.3.2 should make it clear that existing systems should only be replaced with new technology if that technology offers improvements in functionality, reliability, or cost. Our experience is that the simplest technologies are the best for the types of long term uses required under long term stewardship.

The DOE is right to move forward and implement such a strategic stewardship plan, after necessary thoughtful modifications. Doing so is correct economically, environmentally, and legally. Careful

implementation of wise stewardship activities can save decades of controversy and wasteful expenses reworking old problems. We look forward to the opportunity for more extensive review of future drafts of this document as additional details are provided and we appreciate DOE's ongoing commitment to allowing stakeholder review.

Sincerely,

Robert Peelle  
Lorene Sigal  
Alfred Brooks  
Donna Campbell  
Norman Mulvenon  
Peery Shaffer  
Tyler Johnson  
Alix King  
Roger Macklin  
John Million  
Josh Johnson  
Claudia Lever  
Scott Vowell

Cc: Jessie Roberson, DOE EM-1  
Dave Geiser, DOE EM-51