



Many Voices Working for the Community

Oak Ridge Site Specific Advisory Board

August 5, 2003

Ms. Jessie H. Roberson
Assistant Secretary for Environmental Management (EM-1)
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Dear Ms. Roberson:

Comments on Long-Term Stewardship of DOE Legacy Waste Sites – A Status Report

The Oak Ridge Site Specific Advisory Board (ORSSAB) has reviewed the *Long-Term Stewardship of DOE Legacy Waste Sites - A Status Report* by the National Research Council (NRC). The ORSSAB heartily endorses the report's Chief Finding as follows:

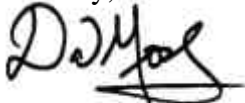
“The committee observed a compartmentalization of cleanup planning and LTS planning at the sites visited: cleanup planning and execution will conclude at a site, and LTS is left to address the resultant end state.

The committee has found no evidence that DOE (a) is considering requirements for and the likely effectiveness of LTS measures when establishing cleanup goals and approaches, or (b) has worked out practical and enduring means of implementing LTS so as to realize its goals for protection over the long term. In the recent emphasis by DOE on the objective of accelerating cleanup, the committee has seen no statement of how DOE will balance that objective against future risks. There is the possibility of a need for additional cleanup in the future if remediation is poorly planned or carried out. Moreover, if greater reliance on LTS is chosen over contaminant reduction, the consequences and in turn the risks of LTS failures may increase. Explicit consideration of LTS issues when establishing cleanup goals and approaches would demonstrate that DOE is taking its responsibilities seriously – a key step in building trust among wary stakeholders. The failure to link LTS to cleanup undermines credibility and strengthens the fear among skeptical stakeholders and regulators that a hollow promise of stewardship is being imposed as a substitute for more costly and complete near-term cleanup.

The committee has seen some progress in DOE efforts on LTS in recent DOE documents, but despite statements embracing LTS, the way in which DOE has selected, developed and implemented remedies means that LTS continues to be an afterthought in practice.”

The information-gathering work of the NRC committee ended earlier than planned, and while we prefer the project could have been carried out fully, the conclusions drawn match many concerns of the ORSSAB as set forth in a number of our recommendations, as well as concerns expressed by DOE. In short, we seem to have reached a solid consensus. We hope this ensures that implementation of long-term stewardship plans will move forward.

Sincerely,



David N. Mosby, Chair

Cc: Dave Adler, DOE-ORO
Sid Garland, Bechtel-Jacobs Company LLC
Dave Geiser, EM-51
Pat Halsey, DOE-ORO
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