



**U.S. Department of Energy
Office of Legacy Management**

STRATEGIC PLAN

**“Managing
Today’s Change,
Protecting
Tomorrow’s Future”**

July 2004

Message to the Reader

Dear Reader,

I am pleased to present the Office of Legacy Management's Strategic Plan, demonstrating the Department's vision and commitment to manage legacy responsibilities effectively and efficiently.

The U.S. Department of Energy (the Department) is both reducing the environmental consequences of our past actions and expediting the cleanup of our sites. Accelerated cleanup requires a comprehensive Department-wide approach to plan and monitor our investments in hundreds of sites across the country to make sure that our environmental remedies are working and will continue to protect future generations. To this end, the Department created a new, stand-alone Office of Legacy Management, with the mission to manage the Department's post-closure responsibilities and ensure the future protection of human health and the environment. This Office has control and custody for legacy land, structures, and facilities, and is responsible for maintaining them at levels suitable for long-term use.

This strategic plan explains our Office's responsibilities and outlines a comprehensive management plan for all environmental and human legacy issues. The goals, strategies, and performance measures presented here define the indicators of progress towards our vision of a nation disburdened of its current fears and worries related to these important environmental concerns.

We look forward to working with you to realize the goals and objectives of this strategic plan.

Michael W. Owen
Director, Office of Legacy Management

Executive Summary

Activities of the U.S. Department of Energy (the Department) and predecessor agencies, particularly during the Cold War, have left a legacy of environmental impact at over 100 sites. Workers associated with these historical and current activities number in the hundreds of thousands. Addressing this environmental and human legacy has been, and will continue to be, a major Departmental undertaking.

On December 15, 2003, the Department took a significant step toward managing post-closure activities so as to ensure the future protection of human health and the environment by creating the Office of Legacy Management to carry out this mission. This Office has control and custody for legacy land, structures, and facilities, and is responsible for maintaining them at levels suitable for their long-term use.

Legacy Management's primary goals are to:

- protect human health and the environment through effective and efficient long-term surveillance and maintenance;
- preserve, protect, and make accessible legacy records and information;
- support an effective and efficient work force structured to accomplish departmental missions and assure contractor worker pension and medical benefits; and
- manage legacy land and assets, emphasizing protective real and personal property reuse and disposition.

The strategic plan identifies what the Office of Legacy Management will do to carry out its responsibilities while responding to increasing issues and demands. This strategy includes processes for implementing effective and efficient business practices, incorporating future advances in science and technology, and ensuring close coordination with stakeholders, Congress, and state, Tribal, and local governments.

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Part I. Background

The end of the Cold War and its associated nuclear arms race has brought about a new mission for the Department; one dedicated to managing the environmental and human legacies that remain as a direct result of nuclear weapons production and stockpiling.

For over 50 years, the Department and its predecessor agencies acquired, consumed, and produced a wide variety of nuclear and nonnuclear materials to manufacture weapons and conduct other departmental missions. To accommodate this mission, more than 20,000 facilities throughout the country were built, a large contractor work force was established, and communities were transformed.

The breakup of the Soviet Union in 1991, together with President George H.W. Bush's announcement of the first unilateral nuclear weapons reduction agreement on September 27, 1991, signaled the end of the Cold War and dramatically reduced the need for further nuclear weapons production. This brought fundamental change as the Department shifted from weapons production to other missions such as environmental management, weapons dismantlement, and science and technology research.

Over the last 13 years, the Department has made significant progress in environmental remediation, work force restructuring, and community assistance. Millions of cubic meters of waste have been removed, stabilized, or disposed of, and former weapons facilities are being transformed for other uses. The dedicated former contractor work force, instrumental in accomplishing the Department's nuclear weapons production and environmental remediation missions, are receiving earned benefits that are expected to continue. Resources have been allocated to aid communities affected by the Department's changing mission. And thousands of acres have been designated for conservation/preservation uses.

As more weapons facilities continue to close across the country and remediation is substantially completed, there is an even greater need to manage the Department's legacy liabilities. Thus, the Department has realigned its resources and created a sustainable, stand-alone Office of Legacy Management. This organization will allow

for the optimum management of legacy responsibilities.

The Office of Legacy Management is responsible for ensuring that departmental post-closure long-term responsibilities resulting from the nuclear weapon production and the Cold War legacies are met. Successful completion of the Office of Environmental Management's responsibilities requires a refocusing of that program's efforts and a Department-wide approach in securing the continued protection of human health and the environment. While remediation activities will continue to be conducted by the Office of Environmental Management, the other activities associated with implementation of post-closure functions at sites with no continuing mission will be the responsibility of the Office of Legacy Management.

The transition of long term surveillance and maintenance responsibility from the Office of Environmental Management to the Office of Legacy Management allows both offices to focus on their primary missions. Concentrating all legacy functions in an office dedicated to legacy management will heighten the visibility and, consequently, the accountability to the affected communities for successful performance of these important departmental functions.

Legacy Management was created from staff located in the former Office of Worker and Community Transition and selected personnel from the Environmental Management Office of Long-Term Stewardship; the Grand Junction, Colorado Office, and selected personnel located at the National Energy Technology Laboratory in Morgantown, West Virginia and Pittsburgh, Pennsylvania.

In addition to programmatic functions, Legacy Management will inherit regulatory and legal responsibilities associated with the sites that transfer into its authority. This strategic plan addresses the responsibilities that Legacy Management will inherit and outlines a comprehensive management plan to ensure that all environmental and human legacy issues are appropriately addressed.

Part II. Legacy Management Mission, Vision, and Goals

Mission

To manage the Department's post-closure responsibilities and ensure the future protection of human health and the environment. This Office has control and custody for legacy land, structures, and facilities and is responsible for maintaining them at levels suitable for their long-term use.

Vision

Departmental legacy responsibilities are managed in a manner that best serves the department's contractor worker force, communities, and the environment:

- Human health and the environment are protected, and the effects of residual contamination are maintained at protective levels through consistent and effective long-term surveillance and maintenance.
- Relevant records and information are preserved and made publicly accessible.
- Public trust is achieved through cooperative partnerships with stakeholders and state, Tribal, and local governments.
- The Department's former contractor work force is compensated as required through effective management.
- Land is returned to the most practical and beneficial use consistent with the Department's mission requirements.
- Impacts of departmental and contractor work force restructuring are mitigated, working in partnerships with the department's contractor worker force, labor unions, and communities to adapt to changes in the Department's missions.

Goals



A. Protect human health and the environment through effective and efficient long-term surveillance and maintenance.

- This goal highlights the Department's responsibility to ensure the long-term protectiveness of environmental remedies used to remediate legacy waste.



B. Preserve and protect legacy records and information.

- This goal recognizes Legacy Management's commitment to successfully manage records and information of a site transferring into its authority.



C. Support an effective and efficient work force structured to accomplish departmental missions, and assure contractor worker pension and medical benefits.

- This goal recognizes the Department's commitment to its contracted work force and the consistent management of pension and health benefits. As sites continue to close, the Department faces the challenges of managing pension plan and health benefits liability.



D. Manage legacy land and assets, emphasizing protective real and personal property reuse and disposition.

- This goal recognizes a departmental need for coordinated management of legacy assets, including coordinating land use planning, personal property disposition, and protecting natural, cultural, and historical resources.

Part III. Corporate Management Strategy and Principles

Corporate Management Strategy

The Department recognizes that as environmental remediation efforts are accelerated, completed, and facilities are closed, its legacy management responsibilities will increase, requiring an effective and efficient management approach.

The Legacy Management program will be amended when appropriate to reflect sound analytical foundation, full utilization of good business practices, and effective coordination with stakeholders. The following sound management principles will be incorporated into each of the four goals of the Legacy Management program.

- Utilize effective and efficient business practices to meet the legacy management mission. This principle includes maintaining an effective federal staff, effective competition in procurement functions, and developing business practices that are a model in the federal government.
- Ensure that all stakeholders and state, Tribal, and local governments are informed and that forums are created to encourage public participation in future legacy management decisions. This principle includes achieving excellence in business management services in support of legacy management customers and stakeholders.
- Apply historical practices that have proven effective at sites currently in long-term surveillance and maintenance and incorporate these practices at newly remediated sites.

Principles

These principles have been developed to guide the implementation of this strategic plan. The principles are as follows:

- Legacy management is a Department-wide responsibility.

As a whole, the Department is committed to the protection of human health and the environment in all of its actions. Legacy management

requirements should be considered by all departmental elements.

- Legacy management is a component of all aspects of departmental decision-making.

It is the responsibility of sites and Headquarters offices to ensure that legacy management is considered in each decision that impacts DOE cleanup and long-term surveillance and maintenance. This responsibility extends from the identification of remediation alternatives, remedial design, construction, and operation and through all relevant decisions made over the lifetime of the hazards.

- The Department is a trustee of natural and cultural resources.

Residual hazards should be managed within the larger context of federal land management, which includes trusteeship for ecologically and culturally important areas. The Department will manage these hazards in accordance with applicable regulatory requirements.

- Legacy management responsibilities, especially long-term surveillance and maintenance, should be incorporated into relevant departmental policies, practices, and systems.

Legacy Management's long-term surveillance and maintenance program will be most effective when integrated into existing departmental processes and management systems. As these DOE policies, practices, and systems (such as Real Property Asset Management, Integrated Safety Management, and Environmental Management Systems) are reviewed and/or implemented, a broad range of long-term surveillance and maintenance activities and needs may be incorporated. This approach will facilitate the establishment of long-term surveillance and maintenance as an essential element of all facets of departmental missions.

- An intergenerational approach is needed for legacy management.

Legacy management is a commitment by the federal government. Due to the longevity of

hazards, the ramifications and costs of current and future decisions and missions will be experienced by generations to come. As these generations' land use practices and local community structures change over time, current assumptions that guide departmental policy may require reevaluation and modification.

- Legacy management policy must provide a consistent framework and acknowledge sites' need for flexibility.

Although a consistent framework for legacy management responsibilities is required for complex-wide management, Headquarters and sites must be responsive to site-specific requirements (local, Tribal, state, regional, and Federal). Therefore, departmental legacy management policy must be sufficiently flexible to enable sites to perform necessary long-term surveillance and maintenance functions based on site-specific regulatory frameworks and communities.

- The involvement of stakeholders and state, local, and Tribal governments in the planning and implementation is critical to legacy management.

The Department has the responsibility to consult with affected parties on legacy management issues. Ongoing interaction and exchange increases public awareness. In turn, heightened public and Tribal government awareness facilitates informed decision making and increases the likelihood of successful management of legacy responsibilities. The Department also recognizes its responsibility to ensure that environmental justice principles are incorporated into all legacy management decisions.

Part IV. Objectives and Strategies for Legacy Management Goals



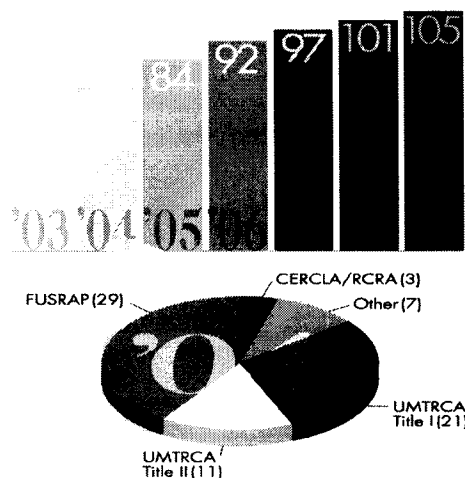
Goal A. Protect Human Health and the Environment through Effective and Efficient Long-Term Surveillance and Maintenance

Situation

Many departmental facilities cannot be remediated to levels that allow for unrestricted use because of technical or economic limitations, or worker health and safety challenges. These facilities are, or will be, required to meet regulatory standards, ensuring that engineered and institutional controls employed as part of the remedy maintenance integrity are protective of human health and the environment. Legacy Management will ensure that these controls remain effective. Given the long-lived nature of radionuclides and other residual hazards, it is reasonable to assume that long-term surveillance and maintenance will be required for hundreds or even thousands of years at some facilities.

The Department currently conducts long-term surveillance and maintenance at more than 50 sites, including Formerly Utilized Sites Remedial Action Program sites (FUSRAP), Uranium Mill Tailings Radiation Control Act sites (UMTRCA), and portions of departmental sites where active cleanup has been completed.

The following chart lists the number of sites in Legacy Management's long-term surveillance and maintenance program. All of which are and will be non-continuing mission sites.



The Department recognizes that, as its environmental remediation efforts are accelerated and facilities are cleaned and closed, its long-term surveillance and maintenance responsibilities will increase, requiring a comprehensive and effective management approach. Legacy Management will continue to improve the Department's long-term surveillance and maintenance program, ensuring the protection of human health and the environment.

Objective A.1. Effectively manage post-remediation responsibilities and liabilities.

⊕ **Strategies**

- Utilizing sound project management, engineering, and scientific principles, conduct long-term surveillance and maintenance at Legacy Management sites, ensuring protection of human health and the environment.
- Perform and manage final activities required upon completion of Environmental Management responsibilities.
- Conduct monitoring and maintenance, evaluating and improving the effectiveness of long-term surveillance and maintenance strategies.
- Ensure contingency plans are in place and that adequate funds are available.
- Comply with all applicable environmental, health, and safety requirements and regulations.
- Communicate with stakeholders involved in long-term surveillance and maintenance activities, and work with federal, state,

Tribal, and local governments to share lessons learned and technologies.

- Manage the Department's environmental liability for surveillance and maintenance consistent with laws and regulations.
- Develop and implement a site transition framework to ensure smooth transition of sites into Legacy Management.

 **Success Indicators**

- Periodic reviews and monitoring completed on time with regulator concurrence and/or acceptance of remedy performance.
- Post-closure requirements met and final remedies maintained in accordance with applicable laws.
- Community, state, and Tribal government acceptance of remedy maintenance.

Objective A.2. Ensure that long-term surveillance and maintenance responsibilities are understood and built into the way the Department does business.

 **Strategies**

- Develop the long-term surveillance and maintenance baseline, integrating it into the Department's management policies and principles.
- Facilitate Department-wide understanding and agreement on the scope of long-term surveillance and maintenance and resolve relevant issues through Department-wide forums or processes, such as the DOE Field Management Council.

 **Success Indicators**

- Effective and efficient long-term surveillance and maintenance plans developed and implemented for all sites requiring them.
- Incorporation of critical long-term surveillance and maintenance elements into all relevant departmental orders, planning, and management systems.

Objective A.3. Ensure resources and tools are in place to provide continuous improvement in the effectiveness of long-term surveillance and maintenance for current and future generations.

 **Strategies**

- Identify, assess, and obtain the capabilities and resources needed to conduct long-term surveillance and maintenance through annual budget requests to Congress.
- Track and use advances in science and technology to improve sustainability and ensure protection.

 **Success Indicator**

- Reduction in the cost of effectively operating, monitoring, and maintaining environmental remedies.
- Risk prevention to human health and environment maintained or improved.



Goal B. Preserve, Protect, and Make Accessible Legacy Records and Information

Situation

The Department's closure site records are managed consistent with legal and regulatory requirements, using National Archive and Records Administration guidance. As sites are identified for mission closure, remediated, and transferred into Legacy Management's authority, the associated site records and information will be transferred as well. Legacy Management will be the custodian for closure site records. Ultimately, this will be an enormous and costly undertaking, which will include managing the records for more than 100 sites across the country. For example, following closure of Mound, Fernald, and Rocky Flats Legacy Management will be the custodian of more than 200,000 cubic feet of records.

The records that Legacy Management receives from closure sites will support the office's mission in a number of ways:

- The records contain information on the cleanup processes employed at the sites, which will be instructive to Legacy Management's long-term surveillance and maintenance program.
- The records contain data on compliance with regulatory requirements and the technical remedies for cleanup of the sites, assuring regulators that these sites do not pose an unacceptable risk to human health or the environment.
- The records include information on work activities and health data of site personnel, information crucial to assuring workers the continuity of their medical and pension benefits.
- The records will also ensure that the public has access to information on governmental operations.

Legacy Management's records and information program will protect, preserve, improve, and

provide appropriate access to records and information systems. Additionally, the program will provide the structure and solutions for effectively and efficiently identifying, collecting, and disseminating information from record sources to internal and external users. The program will work closely with the public, ensuring that information needs are met and that stakeholder issues are incorporated into Legacy Management's processes and future decisions.

Objective B.1. Effectively and efficiently manage records integral to conducting Legacy Management's mission, including those used to perform long-term surveillance and maintenance and ensure benefits continuity.

⊕ Strategies

- Develop and implement a records management program that provides appropriate access to records and retention of critical information necessary to perform the legacy management mission.
- Identify, evaluate, and coordinate the development of Legacy Management records and information management practices with internal and external organizations.

👉 Success Indicators

- Compliance with records management laws and regulations.
- Effective and efficient transfer of records from closure sites to Legacy Management's authority.
- Maintenance and storage of records in a cost-effective manner.
- Timely access to information for internal and external users.

Objective B.2. Identify and establish accessibility and security requirements for records and information management systems, providing effective access to information for impacted contractor workers and stakeholders.

⊕ **Strategies**

- Determine records and information requirements and functional access needs by reviewing existing and documented record and information requirements of the federal, state, Tribal, and local governments; stakeholders; and the public. Reevaluate these requirements periodically.
- Determine the information resource requirements needed by Legacy Management sites to support the development, operation, and maintenance of, and access to information systems.

- Develop sustained capability for public access, retrieval, and comprehension of the long-term surveillance and maintenance information.

👉 **Success Indicators**

- Access mechanism provided for internal and external requests of legally releasable records for which Legacy Management is custodian.
- Access provided to stakeholders to legally releasable custodial information.
- Significant use of public access systems.
- No release of custodial records to unauthorized source.
- Compliance with the National Archive and Records Administration guidance.



Goal C. Support an Effective and Efficient Work Force Structured to Accomplish Departmental Missions, and Assure Contractor Worker Pension and Medical Benefits

Situation

The Department is committed to mitigating the impacts of departmental restructuring on its contractor work force and ensuring the continuity of their pension and medical benefits. Legacy Management will oversee the administrative tasks related to work force planning for the Department, assist in developing benefits packages for displaced contractor workers, oversee labor relations efforts, and minimize the impact of work force restructuring on affected workers.

Since 1993, more than 50,000 contractor personnel have been separated without work disruptions at the sites or legal actions. Through this work force reduction the Department has realized annual savings of almost \$4 billion. Legacy Management will continue to support restructuring efforts within the Department while maintaining the effectiveness of the contractor work force.

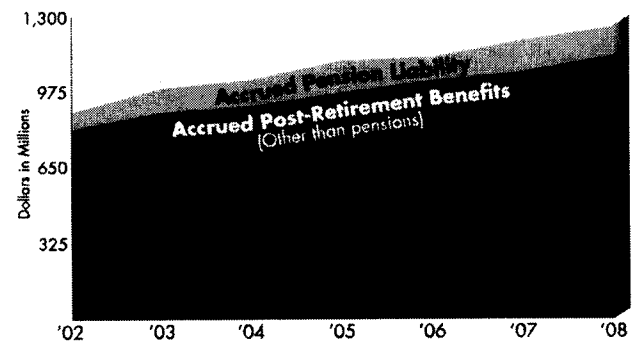
In addition, Legacy Management will ensure the continuity of this work force's pension and medical benefits. In the next three to five years, three departmental sites (Mound, Fernald, and Rocky Flats) are expected to close as active site remediation is completed. The contracts with the site contractors will terminate, and contracted employees subsequently will lose their jobs. However, these closure site employees are contractually entitled to an array of employee benefits funded by the Department. Some of the benefits (defined benefit pension, self-insured long-term disability, medical continuation, severance, retiree life and health insurance) have been either not fully funded or not funded at all.

It is anticipated that, at least with respect to retiree medical benefits, there will be a continuing need to administer and manage a benefit program to deliver the promised benefits. It is against departmental policy to assume the role of plan sponsor and fiduciary duties, as those responsibilities must remain with the plan sponsor. Thus, Legacy Management will work with plan sponsors to ensure that medical and pension

benefits are paid consistently and comprehensively at all closure facilities

The total liability for unfunded post-closure benefits (for Rocky Flats, Mound, Fernald, Pinellas, Grand Junction, and the gaseous diffusion plants in Ohio, Kentucky, and Tennessee) is in excess of \$1 billion (unfunded pension benefits, retiree health and life insurance, and post-employment benefits such as accrued vacation, severance, long-term disability, and medical benefits for displaced workers). The liability will, more than likely, not be fully settled for decades. Legacy Management will develop a plan to facilitate the consistent and comprehensive pay out of medical and pension benefits at all closure facilities. Legacy Management will create sound policy and guidance to adequately and efficiently fulfill the Department's obligations to its contractor work force.

The following chart depicts the cost to the Department for accrued pension liability.



Objective C.1. Develop and implement a departmental approach and guidance, ensuring contracted employees continuity of their pension and medical benefits.

Strategies

- Establish policy, coordinate implementation of, and evaluate the

outcomes of work force restructuring consistent with Section 3161 of the National Defense Authorization Act for Fiscal Year 1993.

- Prescribe a consistent methodology for cost analysis for current employee and retiree benefits programs.
- Clarify and streamline the processes, roles, and responsibilities from review to approval of benefit plan changes.
- Evaluate the feasibility of implementing a model program designed to make the medical benefits program more consistent across closure sites, and facilitate efficient and effective benefits delivery.
- Acquire and maintain contractor support of this program.

Success Indicator

- Consistent legacy benefit and pension delivery to all departmental contractors at closure facilities.

Objective C.2. Ensure the fair treatment of workers by effectively planning and managing work force restructuring and by providing incentives for orderly reductions in contractor personnel.

Strategies

- Provide definitive direction on the amounts of severance permitted for work force separations.
- Provide separation benefits comparable to industry standards.
- Coordinate with departmental field management in managing the work force planning process (e.g., approving necessary involuntary separations, providing enhanced benefits, and submitting final work force restructuring plans to Congress).

- Ensure that necessary work force reductions are conducted in a manner that encourages voluntary separations, assists displaced workers in securing new employment, provides basic benefits for a reasonable transition period, and conforms to cost guidance and best business practices.
- Ensure work force restructuring is conducted in a manner that retains critical skills for ongoing mission requirements, enhances efficiency, and accurately forecasts mission performance implications of potential future budget reductions.

Success Indicators

- Reduction of work force separation prior to completion of the mission at hand and the closure of departmental facilities.
- Reduction of displaced work force on unemployment.

Objective C.3. Promote an improved working relationship between labor and management in the Department's contractor work force by ensuring the uniform application of relevant labor standards to increase productivity, enhance safety and security, and reduce disruptive labor disputes.

Strategies

- Establish policy for and oversee the collective bargaining process.
- Assist field organizations in labor/management relations.
- Implement the contract reform initiative, outsourcing policy, and other strategic alignment elements.

Success Indicator

- Annual cost savings (as compared to the one-time cost of separation).



Goal D. Manage Legacy Land and Assets, Emphasizing Protective Real and Personal Property Reuse and Disposition

Situation

The Department is the fourth largest federal land manager, conducting its mission at 50 major sites on 2.4 million acres across the United States. In addition to land, the Department's assets include distinctive world-class facilities; irreplaceable natural and cultural history; and rare assemblages of plants, animals, and mineral resources. Numerous sites and tens of thousands of acres of land will be transferred to Legacy Management after active environmental remediation has been completed. The office will act as a steward for lands under its authority, overseeing the proper management of these manmade and natural resources and ensuring their beneficial use for current and future generations.

Legacy Management will consider environmentally sound future land uses for its properties, directing a significant effort to maintaining healthy land and evaluating possible land reuse options. To accomplish this, Legacy Management will implement departmental land use planning processes taking into account economic, ecological, social, and cultural factors surrounding each facility or parcel of land. Where compatible with departmental missions, Legacy Management will make excess lands and facilities available for government, public, and private use consistent with the tenets of sustainability and good land management practices.

Additionally, Legacy Management will assist communities through its personal property reuse program. This program promotes the transfer of departmental personal property that has been declared excess by local departmental property managers to Community Reuse Organizations at little or no cost to the organization. This property is used to bring in new business, expand existing business, or fund economic development programs within communities. Legacy Management will encourage the reuse of existing departmental personal property to encourage community economic viability and diversification.

Objective D.1. Manage Legacy Management property assets, maintaining the health of the land and cultural, natural, and historical resources.

⊕ Strategies

- Manage Legacy Management's real property assets and evaluate execution through on-site reviews, visits, reports, and assessments.
- Seek to expand opportunities for collaborative land use planning with site management teams to be transferred to Legacy Management.
- Seek to expand opportunities for collaborative land use planning with federal, state, Tribal, and local governmental authorities.
- Record, maintain, and share knowledge of natural, cultural, and historical/critical resources through documentation, conservation, information exchange, and public participation.

👉 Success Indicators

- Development and implementation of a credible and affordable land assessment strategy.
- Periodic reviews of the program's land management strategies and assessment of strategy effectiveness.
- Integration of natural, cultural and historical resource protection requirements for lands and facilities.

Objective D.2. Provide opportunities for land transfer availing departmental lands to other federal agencies and nonfederal entities.

⊕ **Strategies**

- Work with other federal agencies and external organizations to transfer real property from the Department.
- Work with land users, local communities, and others in updating existing land use plans to address emerging opportunities.
- Investigate viable and environmentally sound land reuse options for lands under Legacy Management's authority.

👉 **Success Indicator**

- Increase in the number of acres transferred, leased, converted to beneficial use, or set aside for preservation.

Objective D.3. Effectively manage and coordinate the Department's requirements for strategic materials.

⊕ **Strategies**

- Provide advice to the administrator of the Department of Defense's National

Stockpile Center on the acquisition and disposition of strategic and critical materials.

- Represent the Department on the Presidential Advisory Management Impact Committee (co-chaired by the Departments of State and Commerce).

👉 **Success Indicator**

- Adequate amounts of strategic materials in the stockpile are allocated to the Department for future program needs.

Objective D.4. Effectively work with and assist Community Reuse Organizations, facilitating departmental personal property transfers.

⊕ **Strategy**

- Facilitate, consistent with DOE guidance, the transfer of personal property to the Community Reuse Organizations where appropriate.

👉 **Success Indicator**

- Increase the amount of personal property transferred to Community Reuse Organizations.