

Long-Term Stewardship Public Involvement Report for Fiscal Year 2003



**Idaho
Completion
Project**

Bechtel BWXT Idaho, LLC

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Long-Term Stewardship Public Involvement Report for Fiscal Year 2003

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ABSTRACT

From March through July of 2003, U.S. Department of Energy (DOE) and Bechtel BWXT Idaho, LLC (BBWI) personnel conducted several public meetings with stakeholders and government officials in the communities surrounding the Idaho National Engineering and Environmental Laboratory (INEEL). The meetings centered on topics related to long-term stewardship. The communities involved included Fort Hall, Rexburg, Idaho Falls, and Arco, which are Idaho communities, as well as the community of Jackson, Wyoming.

This report includes a brief background of long-term stewardship public involvement, a DOE presentation, an implementation plan public comment period, and stakeholder questions and comments. Ten stakeholder organizations invited DOE and BBWI personnel to present a brief overview of the INEEL long-term stewardship program and the long-term stewardship implementation plan. Two organizations communicated concerns through conference calls. These meetings provided an opportunity for stakeholders to ask questions and supply feedback. The INEEL long-term stewardship program plans to report annually to stakeholders and Shoshone-Bannock Tribes, obtain their ideas for achieving the strategic objectives, and incorporate that information into stewardship management planning. Additionally, the long-term stewardship program will coordinate its stakeholder involvement activities with other Idaho Completion Project programs.

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Long-Term Stewardship Public Involvement Report for Fiscal Year 2003

1. INTRODUCTION

To protect the public and the environment long after cleanup is completed, the Idaho National Engineering and Environmental Laboratory (INEEL) established the long-term stewardship (LTS) program in 2001. The *INEEL Long-Term Stewardship Strategic Plan* (DOE-ID 2002a) and the *INEEL Long-Term Stewardship Implementation Plan* (DOE-ID 2003) define the LTS program. The Strategic Plan contains INEEL long-term stewardship goals, objectives, and mission and vision statements, while the Implementation Plan describes current and future activities that support objectives in the Strategic Plan.

The INEEL wrote the *Long-Term Stewardship Public Involvement Plan* in 2001 (INEEL 2001), outlining how stakeholder groups and the Shoshone-Bannock Tribes would help define the LTS program and be involved in developing the Strategic Plan and Implementation Plan. One goal of the Strategic Plan is to help stakeholders and the Shoshone-Bannock Tribes understand and be involved in long-term stewardship. To support this goal, the INEEL developed two strategic objectives: (1) identify appropriate levels of stakeholder and tribal involvement in INEEL long-term stewardship decisions and actions, and (2) maintain close relationships and communication with programs, agencies, stakeholders, and members of the Shoshone-Bannock Tribes to ensure that the U.S. Department of Energy (DOE) consistently understands and considers their long-term stewardship concerns.

In 2002, the Citizens Advisory Board, citizen activist groups, city and county officials, agencies, and members of the Shoshone-Bannock Tribes participated in the development of the Strategic Plan by reviewing and commenting on a draft of the plan. Their comments were incorporated into the final plan and were used as a basis for the development of the Implementation Plan. In 2003, these groups reviewed draft copies of the Implementation Plan and some provided comments, which were incorporated into the final Implementation Plan (DOE-ID 2003).

2. FISCAL YEAR 2003 STAKEHOLDER INVOLVEMENT ACTIVITIES

From March through July of 2003, DOE and Bechtel BWXT Idaho, LLC (BBWI) personnel conducted several public meetings with stakeholders and government officials in the communities surrounding the INEEL. These communities included the Idaho cities of Fort Hall, Rexburg, Idaho Falls, and Arco, in addition to Jackson, Wyoming. This report includes a brief background of LTS public involvement, the DOE presentation, the Implementation Plan public comment period, and stakeholder questions and comments.

Long-Term Stewardship personnel contacted the following 22 local and regional stakeholders to determine their interest in learning more about the INEEL LTS program (refer to Appendix A for more detail about these groups):

- Shoshone-Bannock Tribes
- Citizens Advisory Board and its subcommittee

- Resource Conservation and Development (RC&D) groups in Rexburg, Gooding, Twin Falls, and Pocatello
- Association of Idaho Cities
- INEEL State Oversight
- Butte County commissioners
- Idaho Department of Fish and Game
- Coalition 21
- City councils in the Idaho cities of Arco, Ketchum, Rigby, Twin Falls, Pocatello, Hailey, Idaho Falls, Rexburg, and in Jackson, Wyoming
- Snake River Alliance
- Keep Yellowstone Nuclear Free.

Ten stakeholder organizations invited DOE and BBWI personnel to present a brief overview of the INEEL LTS program and the LTS Implementation Plan. Two organizations communicated concerns through conference calls. These meetings provided a good opportunity for stakeholders to ask questions and supply feedback. For example, the public and the Shoshone-Bannock Tribes were invited to review a draft of the INEEL LTS Implementation Plan and provide feedback.

3. PUBLICATIONS AND OTHER OUTREACH MATERIALS

The LTS program presentation included a number of historical pictures of the INEEL, a brief summary of the strategic objectives, and an introduction to sections of the LTS Implementation Plan (DOE-ID 2003). Copies of the slides used in many of the presentations are presented in Appendix B. A brochure (see Appendix C) that summarizes the LTS program, defines many of the most common LTS terms, and lists additional LTS resources was handed out to participants.

Stakeholders who requested a hard copy were mailed a draft of the Implementation Plan one week ahead of schedule on July 7, 2003; the plan was also posted on the Internet on July 7. A press release notified the public that the plan was available for review. The public then had until August 15, 2003, to review and comment on the plan. Relatively few stakeholders provided comments in the allotted time.

4. CHANGES TO LONG-TERM STEWARDSHIP PROGRAM, BASED ON STAKEHOLDER COMMENTS

The INEEL LTS program was modified in response to comments from the public, tribal governments, and INEEL employees.

Before the first draft of the Strategic Plan was written, INEEL LTS personnel researched documents recording local and national public comments about long-term stewardship to extract the concerns of stakeholders and the Shoshone-Bannock Tribes. These comments were used to develop proposed vision and mission statements and the implementing objectives. The INEEL LTS personnel then consulted other DOE sites with long-term stewardship activities, the Shoshone-Bannock Tribes, the

INEEL Citizens Advisory Board, federal and state agencies, regulatory organizations, environmental advocacy groups, a local Resource Conservation and Development Council, and local municipal governments. As a result of these consultations, personnel revised many of the objectives and the vision and mission statements before issuing the Strategic Plan (DOE-ID 2002a) for formal public comment.

Local stakeholders and the Shoshone-Bannock Tribes expressed concerns about management of INEEL land after DOE finishes its mission. Because DOE plans to continue using the INEEL as a national multipurpose laboratory, DOE intends to retain management of the INEEL lands as currently configured. Before INEEL makes any final land-use decisions, DOE will consult stakeholders and the Shoshone-Bannock Tribes to ensure that their concerns are considered. In addition, DOE has an Agreement in Principle with the Shoshone-Bannock Tribes, establishing the protocols and expectations for interaction about the INEEL. The DOE will continue to abide by that agreement when making land-use decisions for the INEEL.

5. STAKEHOLDER INVOLVEMENT OBSERVATIONS

INEEL officials met with interested groups, took part in telephone conference calls, and received written comments. Meetings effectively informed stakeholders about LTS activities, but the audience numbers were relatively low. Small group discussions were, however, a good venue for stakeholders to ask questions. Appendix D summarizes comments and questions.

Advertisements published in local newspapers in advance of meetings with community leaders or civic organizations did not appear to increase public attendance. Personal contact with clearly interested parties has been shown to be more effective, so advertisements may be dropped in the future.

Interestingly, most stakeholders did not comment on the implementation plan; however, all stakeholder comments received were incorporated into the final LTS Implementation Plan (DOE-ID 2003). A list of the public comments on the draft LTS Implementation Plan is included in Appendix E.

6. LONG-TERM STEWARDSHIP PATH FORWARD

The 2002 announcement by DOE to change INEEL's landlord responsibility from Environmental Management (EM) to the Office of Nuclear Energy, Science, and Technology (NE) brought questions from stakeholders and the Shoshone-Bannock Tribes about stewardship responsibility. The current DOE assumption is that EM will continue to fund and manage stewardship activities until the Idaho Completion Project finishes remediation activities. Once the EM mission is complete, NE as the site landlord is expected to assume remaining long-term stewardship responsibility. Postponing the transfer to NE until remediation is complete would allow time to (1) establish a plan and operating baseline for long-term stewardship activities, (2) determine and reprogram resources and budget required for those activities, and (3) reach final agreement between EM and NE on the path forward for conducting long-term stewardship activities.

Given the lengthy time frames and the issues of risk that long-term stewardship must address, uncertainty is inevitably an important element in the decision-making process. The LTS program plans to report annually to stakeholders and Shoshone-Bannock Tribes, obtain their ideas for achieving the strategic objectives, and incorporate that information into stewardship management planning. The LTS program will primarily target those groups that have expressed an interest in staying involved. Additionally, the LTS program will coordinate its stakeholder involvement activities with other Idaho Completion Project programs.

7. REFERENCES

- DOE-ID, 2002a, *INEEL Long-Term Stewardship Strategic Plan*, DOE/ID-11008, Revision 0, U.S. Department of Energy Idaho Operations Office, September 2002.
- DOE-ID, 2002b, *Environmental Management Performance Management Plan for Accelerating Cleanup of the Idaho National Engineering and Environmental Laboratory*, DOE/ID-1106, Revision 0, U.S. Department of Energy Idaho Operations Office, July 2002.
- DOE-ID, 2003, *INEEL Long-Term Stewardship Implementation Plan*, DOE/ID-11084, Revision 0, U.S. Department of Energy Idaho Operations Office, September 2003.
- INEEL, 2001, *Long-Term Stewardship Public Involvement Plan*, INEEL/EXT-01-01445, Idaho National Engineering and Environmental Laboratory, October 2001.

Appendix A
Contacted Groups

Appendix A

Contacted Groups

A-I. CONTACTED GROUPS

A-I.1 Governments

Mayors, city council members, and county commissioners were among the local government representatives briefed on the LTS Implementation Plan in the summer of 2003. City representatives in the Idaho communities of Arco, Idaho Falls, Pocatello, Rexburg, Rigby, Hailey, Ketchum, Twin Falls, as well as representatives in Jackson, Wyoming, were contacted. Briefings and copies of the plan were offered to all representatives. An Idaho Falls City Council member told the LTS team about an opportunity to reach several city representatives at once at an Association of Idaho Cities meeting, so the team took advantage of that opportunity with the June 2 briefing in Rexburg.

Members of the Fort Hall Business Council and other leaders of the Shoshone-Bannock Tribes were briefed in Fort Hall.

Representatives of the INEEL State Oversight organization, which monitors activities at the INEEL on behalf of the citizens of Idaho, were briefed in Idaho Falls.

A-1.2 Idaho Department of Fish and Game

The Upper Snake Region of the Idaho Department of Fish and Game showed interest in and commented on the Implementation Plan. The mission of the Fish and Game department is to preserve, protect, and perpetuate the fish and wildlife resources of the state.

A-I.3 Resource Conservation and Development

Members of the Wood River (Gooding), High Country (Rexburg), Mid-Snake (Twin Falls), and Three Rivers (Pocatello) Resource Conservation and Development (RC&D) organizations were contacted. Their mission is to accelerate the conservation, development, and utilization of natural resources, improve the general level of economic activity, and enhance the environment and standard of living in designated RC&D areas.

A-I.4 Snake River Alliance

The Snake River Alliance is an Idaho-based group with the stated goal of working through research, education, and community advocacy to end nuclear weapons production and to work toward responsible solutions to nuclear waste and contamination problems.

A-1.5 Coalition 21

Coalition 21, a small group mostly consisting of former INEEL employees, was established to support technologies, including nuclear technologies that can meet the needs of a productive society. The group was founded by people who believe that nuclear energy must have a vital role in our nation's future.

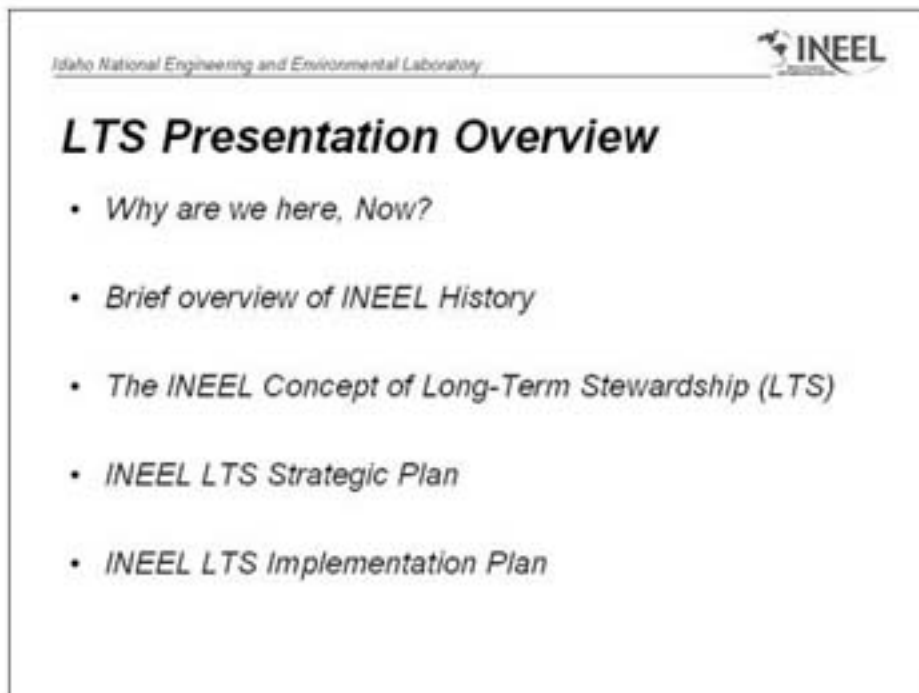
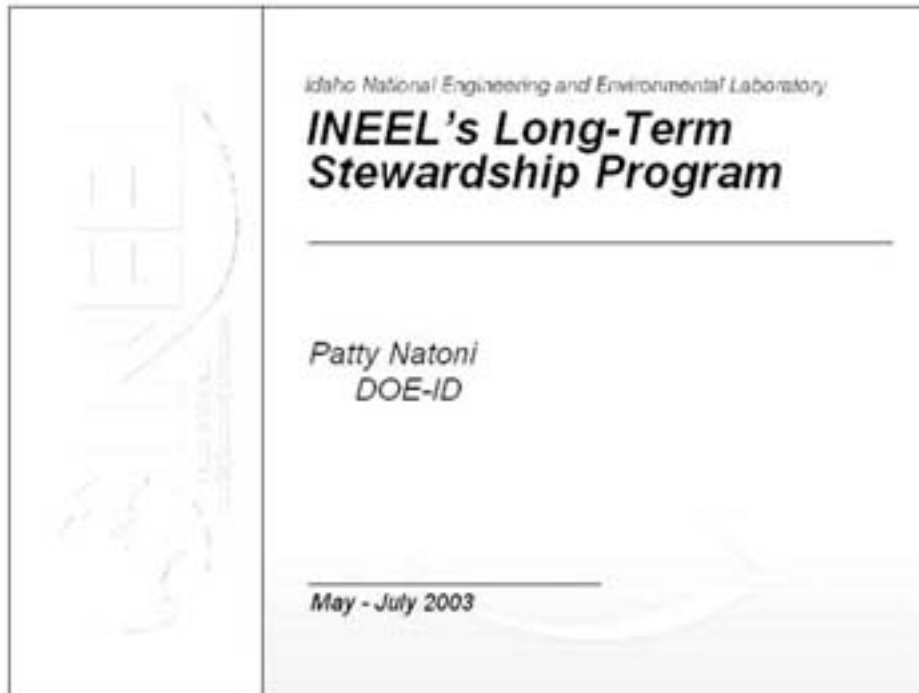
A-I.6 Keep Yellowstone Nuclear Free

Keep Yellowstone Nuclear Free’s stated mission is to protect the citizens, environment, and wildlife of the greater Yellowstone and Grand Teton ecosystems and the Jackson Hole valley from radioactive and hazardous emissions from the INEEL, and to “elevate public awareness of the threat posed by toxic and hazardous facilities operating at INEEL.”

A-I.7 INEEL Citizens Advisory Board

The INEEL Citizens Advisory Board is a community advisory group that gives DOE recommendations on INEEL cleanup and waste management plans.

Appendix B
Long-Term Stewardship Presentation



INEEL History

- *The Arco Desert in eastern Idaho has been used by federal agencies to conduct various conventional weapons testing and nuclear research dating back to the 1940s.*
- *During the past five decades, these activities created waste by-products that were disposed at the INEEL using common techniques of the time. Leaks, discharges, and accidental releases also contributed to contamination at the INEEL.*



CONSTRUCTION OF TANK FARM AT INEEL



CONSTRUCTION OF HANGER AT TAN



DISPOSAL OF BARRELS AT RWMC

Our approach for INEEL Long-Term Stewardship implementation

"OPTIMIZATION & IMPROVEMENT"

Identify existing activities that address LTS and the strategic objectives

Make improvements to programs and procedures with respect to LTS

Achieve the strategic objectives and get the work done more efficiently.

Schedule of LTS activities

***FY-01: Interfaced with HQ to define the LTS Program
Developed the LTS transition guidance***

***FY-02: Developed the LTS Public Involvement Plan
Developed INEEL LTS Strategic Plan with stakeholders***

***FY-03: Develop INEEL LTS Implementation Plan
Develop INEEL LTS Information Management Plan***

FY-04: Implement the INEEL LTS Strategic Objectives

Long-Term Stewardship scope limitations

- *The INEEL Long-Term Stewardship Program does not determine end states*
- *The INEEL Long-Term Stewardship Program does not make land disposition/transfer decisions*

What Next?

- *The LTS implementation plan will be posted on the internet (July 2003) at*
<http://www.inel.gov/environment/ineel-lts.shtml>
- *Hard copies will be available upon request.*
- *Comments can be submitted to: Patty Natoni*
natonipm@id.doe.gov
- *The comment period runs through August 15, 2003. Please submit all comments to DOE-ID.*

The takeaway message:

Following completion of the Idaho Completion Project, an INEEL LTS Program will remain to consolidate long term commitments, manage and monitor residual contamination, and coordinate activities for management of natural and cultural resources.

An INEEL LTS Program will be the connection between the past and the future – sustaining the knowledge about what happened and what can be done with Idaho land currently managed by DOE.

INEEL LTS Strategic Plan – Goals and Strategic Objectives

GOALS						
Goal 1: Establish the foundation of the long-term program	Goal 2: Monitor and coordinate all activities	Goal 3: Develop a management plan that is consistent with the cleanup process, and identify the activities to be undertaken	Goal 4: Develop a management plan that is consistent with the cleanup process, and identify the activities to be undertaken	Goal 5: Develop a management plan that is consistent with the cleanup process, and identify the activities to be undertaken	Goal 6: Develop a management plan that is consistent with the cleanup process, and identify the activities to be undertaken	Goal 7: Develop a management plan that is consistent with the cleanup process, and identify the activities to be undertaken
STRATEGIC OBJECTIVES						
Strategic Objective 1.1: Develop a management plan that is consistent with the cleanup process, and identify the activities to be undertaken	Strategic Objective 1.2: Develop a management plan that is consistent with the cleanup process, and identify the activities to be undertaken	Strategic Objective 1.3: Develop a management plan that is consistent with the cleanup process, and identify the activities to be undertaken	Strategic Objective 1.4: Develop a management plan that is consistent with the cleanup process, and identify the activities to be undertaken	Strategic Objective 1.5: Develop a management plan that is consistent with the cleanup process, and identify the activities to be undertaken	Strategic Objective 1.6: Develop a management plan that is consistent with the cleanup process, and identify the activities to be undertaken	Strategic Objective 1.7: Develop a management plan that is consistent with the cleanup process, and identify the activities to be undertaken
<p>The INEEL Strategic Plan is currently posted on the INEEL web page: http://www.ineel.gov/ineel/strategic</p>						

Next steps

FY2003

- **March – August**
 - **Briefings and discussion with stakeholders and members of the Shoshone-Bannock Tribes**
- **July – August**
 - **Formal public comment period on “Draft INEEL Long-Term Stewardship Implementation Plan”**
- **September 2003:**
 - **Produce Final Implementation Plan**

FY2004 and beyond

- **Implement strategic objectives**
- **Implement information management approach**

How Can You Help

- **The implementation plan will be posted on the internet (July 2003) at**
 - <http://www.inel.gov/environment/ineel-lts.shtml>**
- **We will be seeking the public’s input on our plan.**
 - *What activities should we undertake as our highest priorities?*
 - *How should we objectively measure progress on completing the strategic goals?*
 - *Are there other activities we need to do to accomplish the strategic objectives?*



THE INFORMATION MANAGEMENT CHALLENGE

Information Management

- *Define LTS information and retention times*
- *Define and establish a subset of "Critical" LTS information*
- *Summarize benchmarking activities*
- *Summarize current information infrastructure*
- *Establish information management procedures*
- *Describe how information will be transferred to new formats over time as technology changes to ensure continued access*
- *Define process for information archival and retrieval*

LTS Implementation Plan

- ***Implementation Plan (IP) is currently in development. The plan describes:***
 - ***Definition and scope of INEEL LTS***
 - ***History of LTS program***
 - ***Interfaces with other programs and responsibilities for LTS***
 - ***How stakeholder comments for implementation have been incorporated***
 - ***How LTS Strategic Objectives are currently being implemented***
 - ***Additional implementation needs to achieve the Strategic Objectives***
 - ***LTS information management***

Public Comments received on LTS Strategic Plan

- ***LTS information management***
- ***Notification of what LTS changes affect stakeholders***
 - ***Use of new technology***
 - ***Remedy degradation***
 - ***Procedure/policy changes***
- ***Clarification of roles & responsibilities***

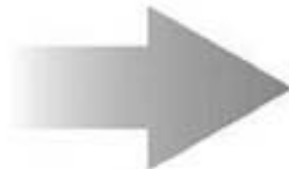
INEEL LTS Strategic Plan

- ***Developed in 2002***
- ***Defines the Mission, Vision, and Goals of the INEEL LTS Program***
- ***Outlines and defines fifteen strategic objectives to be implemented at the INEEL.***
- ***Currently posted on the INEEL Web page:
<http://www.inel.gov/environment/ineel-lts.shtml>***

LTS Strategic Plan & LTS Implementation Plan

- *The INEEL LTS Program is currently in the process of preparing the INEEL LTS Implementation Plan.*
- *We need your help preparing the plan.*

**LTS
Strategic
Plan**



**LTS
Implementation
Plan**



NATURAL RESOURCES STAKEHOLDERS



EBR-I, A NATIONAL HISTORIC MONUMENT



**CEMENT-ENTOMBED WASTE CALCINING
FACILITY AT INTEC**

Long-Term Stewardship also includes:

- *Protection of the historic and cultural resources*
 - *Buildings and structures eligible for listing on the National Register of Historic Places*
 - *Resources of great importance to the cultural heritage of the Shoshone-Bannock Tribes*

- *Management of natural environment*
 - *Weed control*
 - *Ecosystem management (such as the Sagebrush Steppe Reserve)*



INSITUTIONAL CONTROLS SIGN



ROCK-ARMORED CAP ON REMEDIATED WASTE DISPOSAL POND AT TRA

Long-Term Stewardship includes:

- ***Surveillance & monitoring activities***
- ***Groundwater monitoring***
- ***Long-term operations***
 - ***pump and treat***
- ***5-Year CERCLA Reviews***
- ***Institutional controls***
 - ***access control***
 - ***Signs***
- ***Record-keeping activities and Information Management***
- ***Long-term maintenance***
 - ***entombed buildings, barriers, caps, and containment structures***



TEST AREA NORTH SOIL SAMPLING

What is Long-Term Stewardship?

1. *After clean-up is complete, some residual contamination will remain in some areas of the INEEL.*
2. *Some of these areas will require perpetual management (long-term stewardship), and may not be suitable for unrestricted use.*
3. *The long-term stewardship mission is to ensure that contaminated sites are managed responsibly for as long as necessary.*

Long-Term Stewardship (LTS) definition

"....., long-term stewardship refers to activities necessary to ensure protection of human health and the environment following completion of cleanup, disposal, or stabilization of a site or a portion of a site.

**FY2000 National Defense Authorization Act
(NDAA): LTS Report to Congress**



**REMOVAL OF OLD TRASH DUMP DEBRIS
AT BORAX**



**DISPOSING OF UNEXPLODED ORDNANCE
FROM NAVAL GUNNERY RANGE ERA**

Appendix C
Long-Term Stewardship Brochure

*INEEL's
Long-Term Stewardship Program*



What does the Long-Term Stewardship Program do ?

- Manages the natural environment
 - Surveys and monitors groundwater and soils
 - Manages the ecosystem (such as the Sagebrush Steppe Preserve)
 - Controls weeds
- Protects historic and cultural resources
 - Buildings and structures eligible for listing on the National Register of Historic Places
 - Resources of interest and value to the heritage of the Shoshone-Bannock Tribes
- Enforces institutional controls and places access control signs
- Operates long-term groundwater treatment processes
- Maintains barriers, caps, entombed building and containment structures
- Takes care of long-term record keeping and information management
- Prepares five-year reviews of cleanup sites as mandated by law
- Promotes stakeholder involvement and communication

Summary

DOE will continue to maintain the safety and health of the public and the environment and continue to conserve the natural, ecological



Resource study of INEEL cave

and cultural resources of the INEEL. Please take advantage of these involvement opportunities to learn more about the LTS program and provide us with your ideas for better stewardship and a better INEEL.

Stakeholder Involvement Opportunities

The INEEL makes LTS information available to the public in several ways. These include:

- Briefings and discussions with stakeholders and Tribal governments
- A toll-free phone line (1-800-526-5620) that allows anyone to ask questions and request documents related to the INEEL LTS Program
- Distribution of fact sheets and brochures
- A mailing list of interested individuals is maintained for citizens who have expressed interest in receiving information related to LTS
- A World Wide Web site (<http://www.inel.gov>) that provides information on all aspects of the INEEL, including the LTS Program (<http://www.inel.gov/environment/inel-lts.shtml>)
- Document reading rooms in Idaho Falls and Boise areas

For More Information

Patty Natoni
DOE Idaho Project Manager
208-526-0977
natonipm@sl.doe.gov

Definitions

Long-Term Stewardship (LTS) - Activities necessary to ensure the protection of human health and the environment following completion of cleanup or stabilization of a site or a portion of a site. The purpose of the INEEL LTS Program is to ensure the safe and informed use of INEEL facilities and land.

Groundwater - Water that soaks into the ground and percolates downward through rock or soil pores until an impermeable layer stops it. Natural sources are rainfall, snowmelt, and water that seeps into the ground beneath streams, rivers and lakes. Other sources can include irrigated fields, canals, wastewater drain fields, injection wells, leaking pipes and industrial cooling ponds.

Institutional Controls - Generally includes all restrictions on activities or on access or exposure to land, groundwater, surface water and other areas or media. Some common examples of tools to implement institutional controls include restrictions on use or access, zoning and public advisories.

Five-year Review - Periodic reviews of the protectiveness of cleanup activities that are mandated by the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). The review is required at any site where the remedial action leaves hazardous substances on site.

History

Because of its remoteness and distance from any major population base, 890 square miles of desert in eastern Idaho has been used by federal agencies to conduct various conventional weapons testing and nuclear research dating back to the 1940s. After World War II, the U.S. Navy and other military branches conducted ordnance testing, aerial bomb tests, and naval artillery testing at an area of the desert designated as the Naval Proving Grounds. In 1949, the



Nuclear airplane engine

Atomic Energy Commission, a predecessor to the U.S. Department of Energy, created the National Reactor Testing station, which is now known as the INEEL. The primary mission at the time was to design, construct and test nuclear reactors for the purpose of generating electricity to power naval vessels and to conduct nuclear materials testing. More than 50 reactors have been built and tested in the past 50 years.

During the past five decades, these activities created waste by-products that were disposed at the INEEL using common techniques of the time, such as shallow burial, injection wells and unlined wastewater disposal ponds. Waste generated at a DOE facility in Colorado was disposed of at the INEEL. Hazardous and radioactive contaminants were also introduced into the environment from accidental spills, leaks and discharges.

The Environmental Restoration Program was established in 1989 to identify, assess and clean up contaminated areas that pose an unacceptable risk to people or the



Historic method of barrel disposal

environment. Since that time, the INEEL has removed thousands of unexploded ordnance devices, excavated and disposed of thousands of cubic yards of contaminated soil and debris, treated thousands of gallons of water, and placed protective covers over contaminated areas.



Unexploded ordnance

Why Long-Term Stewardship ?

In 1989, the INEEL was added to the U.S. Environmental Protection Agency's Superfund National Priorities List, which requires investigation of all contaminated sites and cleanup of these sites, as necessary.

As cleanup projects are completed, there is a requirement to continue maintenance and monitoring to avoid any activity that could reduce the protectiveness of current barriers. The Long-Term Stewardship Program will ensure that clean-up remedies and institutional controls continue to protect people and the environment long after the INEEL has completed its cleanup mission. The LTS program will sustain information about what hazards remain, so that DOE can make informed decisions when considering future missions at the site. DOE will make sure the communities around the site have information about the risks remaining, and will continue to communicate with those communities while planning and doing stewardship activities.



Soil and vegetation monitoring

Which documents contain information about Long-Term Stewardship?

Department of Energy Long-Term Stewardship

- A Report to Congress on Long-Term Stewardship, DOE/EM-0563, January 2001
<http://its.apps.em.doe.gov/center/ndsareport.html>
- Long-Term Stewardship Study, DOE-EM-0605, October 2001
<http://its.apps.em.doe.gov/center/stewstudy.html>

INEEL Long-Term Stewardship

- INEEL Long-Term Stewardship Strategic Plan, DOE/ID-11008, Rev. 0, September 2002
<http://www.ineel.gov/environment/its-strat-pin-doe-id-11008-r0.pdf>
- INEEL Long-Term Stewardship Baseline Report and Transition Guidance, INEEL/EXT-01-01410, November 2001
- INEEL Long-Term Stewardship Public Involvement Plan, INEEL/EXT-01-01445, Rev. 0, October 2001
- Comprehensive Facility Land Use Plan, DOE/ID-10514, U.S. Department of Energy Idaho Operations Office (1998)
<http://ncorn/waig/>
- INEEL Long-Term Stewardship Implementation Plan (July 2003 Draft)

Appendix D
Summary of Stakeholder Comments and Questions

Appendix D

Summary of Stakeholder Comments and Questions

D-1. SUMMARY OF STAKEHOLDER COMMENTS AND QUESTIONS

D-1.1 Shoshone-Bannock Tribes — 3/13/03

1. How will future generations know of underground contamination if the land surface has been covered or remediated?
2. What is the relationship of NE to the INEEL and LTS? Will NE change the stewardship? Questions arose about what is meant by “accelerated cleanup,” whether the site is shutting down, what it means to have a new mission, and how the transition works.
3. How do we know we have an accurate understanding of what really went on at the facilities, what was really dumped and where, and if we are losing people all the time (through retirement, cutbacks, etc.)?

D-1.2 High Country Resource Conservation and Development Board Meeting — 5/29/03

1. Are the Idaho Nuclear Technology and Engineering Complex (INTEC) tanks irradiated?
2. How are the INTEC tanks neutralized?
3. Are the INTEC tanks stainless steel?
4. How much liquid have you lost?
5. Are you going to dig the tanks up and send them to the Waste Isolation Pilot Plant (WIPP)?
6. Discuss the rumors surrounding the SL1 accident, i.e., the buried ambulance and the “love triangle.”
7. How much ordnance is at the site?
8. Will you ever allow unlimited access to the INEEL?
9. Are the tribes allowed access? Which tribes?
10. Can you guarantee continued funding for the LTS program?

D-1.3 Council of Mayors — 6/2/03

1. Linda Milam commented that the counties surrounding the INEEL need to be interested in the long-term future of the INEEL.
2. Milam expressed concern about the “shrinking of the INEEL.”

3. The DOE needs to work with local agencies as land use plans are developed.
4. Someone asked: Is my confidence justified in assuming the DOE is taking good care of the site?
5. A number of individuals were interested in the site tours.
6. The DOE was admonished to keep communication open with surrounding communities.

D-1.4 INEEL State Oversight Office — 6/5/03

1. Is the LTS program connected with the integrated groundwater program?
2. Where will LTS end up with the split between NE and EM? Who's going to fund it?
3. Will LTS be an active participant in remediation decisions, or will it just passively receive information?
4. Will the LTS program participate in the feasibility study phase of the environmental restoration (ER) process?
5. Some of our former managers wanted a cumulative impact analysis for the INEEL. Do you think LTS is the place for that?
6. What is the policy on "*official use only*" information, and things like maps? Who decides this, and how is the release of information coordinated?
7. Is the INEEL ahead of the game with respect to LTS, compared to other DOE facilities?
8. What is the actual administrative procedure for LTS activities?
9. What are the procedures for emergency response at LTS sites?
10. How does this plan affect the risk-based end states for the INEEL?

D-1.5 Butte County Commissioners — 6/9/03

1. Discuss sagebrush steppe issues.
2. Do you have a relationship with the Arco publisher/editor of the Advertiser? (This was discussed in the context of communicating with Arco residents.)
3. In reference to the photo of the drums being dumped into the pit, the question was asked: How good were records kept for this kind of activity?
4. How broad is your LTS committee? What resources do you have? Is it both DOE and contractor resources?
5. Does the local community have access to the process of LTS?
6. Will LTS be involved in allowing the hunting of migrating animals on the INEEL?

D-1.6 Idaho Fish and Game — 6/11/03

1. What role do you see us playing in your LTS program?
2. Would we be on some interdisciplinary council?
3. What is the timeline for the review of the implementation plan?
4. Are site tours available?
5. What kind of LTS working committees are there?
6. Any interagency committees? It would be good to consider what agencies would be needed and what disciplines would be useful.
7. Some kind of interagency liaison is needed.

D-1.7 Coalition 21 — 6/13/03

1. How long will the organic contamination in the vadose zone (OCVZ) units operate?
2. How long will the Test Area North (TAN) pump and treat units operate?
3. How does the LTS program tie into the decommissioning, decontamination, and dismantlement (DD&D) of facilities? Does LTS have anything to do with the facilities in use? Is LTS involved only with facilities or buildings no longer in use? What about the tank farm?
4. How clean does it need to be to be clean? How contaminated does it need to be to be contaminated? Some assume that the site will be free released. Is this no longer the case?
5. Is it true that as soon as the INEEL gets turned over to another organization, then LTS stops?
6. There was some talk about some of the land being turned over to the public. Is this true?
7. Has the change from EM to NE made major changes in your direction? How will this change impact stewardship?
8. As you go forward and think about new facilities, what would make your successor's job easier?
9. Are you saying you will not produce any more waste?
10. The Process Experimental Pilot Plant (PREPP) and the situation of how it was not finished was mentioned. It makes them a little nervous.
11. Has anyone attempted to compare the different sources of fuel, for example, coal, hydro, nuclear, oil? Coal and oil produce a lot of waste that goes to the atmosphere.
12. There was a meeting earlier in the week on the *Environmental Munugement Performance Munugement Plan* (DOE-ID 2002b) Did anyone attend?
13. Getting information is difficult. More communication with the public is needed!

- 14 What would make your successors' jobs easier 50 years in the future?

D-1.8 Jackson City Council — 6/16/03

1. Do you have any monitors at the bottom of the Waste Calcining Facility?
2. What is an experimental breeder reactor?
3. What are you doing to take care of the old plumbing at the INTEC tank farm?
4. How does the LTS program work with the removal of transuranic (TRU) waste? Concern was expressed about how waste area groups (WAGs) select remedy options and the long-term impact of those options.
5. Disappointment was expressed at the closing of the INEEL office in Jackson.
6. What is the current thinking on the long-term future of the INEEL?
7. The big issue is the INTEC tank farm plumbing.

D-1.9 Citizens Advisory Board LTS Subcommittee Conference Call — 6/18/03

1. The subcommittee wanted an overview of the LTS schedule.
2. It may be difficult to provide comments because of the INEEL review process. (Recommended scheduling a discussion of the INEEL document review process for the next Citizens Advisory Board meeting.)
3. When is the last day for the review?

D-1.10 Snake River Alliance Conference Call — 6/18/03

1. Do you have the sites identified where you will have residual contamination? Do you have a list of the specific sites? Can we get a copy of those sites? Why won't they be in this document (LTS Implementation Plan)?
2. Do you monitor outside the site boundaries, for example, in the Magic Valley area?
3. Do you depend on an electronic record keeping system? Are you looking at that?
4. How is LTS going to relate to the new reactor?
5. Have you gotten any feedback on the definition of LTS? The New Waste Policy Act (NWPA) requires that all high-level waste be disposed of in a geologic repository. Will any high-level waste be left after cleanup is done?
6. People don't have a good overview of everything going on at the site. How can someone like me find out about LTS as a whole? How can we develop a good understanding?

7. Is the groundwater monitored just within the INEEL boundaries? Will groundwater be monitored as long as there are LTS areas? Is BBWI doing all the monitoring at LTS sites?
8. How long do you have to keep LTS records?
9. How will LTS records transfer to the new contractor?
10. Can you send a hard copy of the LTS Implementation Plan to each of the offices?
11. How is LTS going to handle the nuclear waste from a new power plant?
12. Can we comment on the definition of LTS?
13. Comment concerning the NWPA: INEEL cannot leave any high-level waste on the site.
14. What specifically does LTS mean? How many DOE sites will need LTS?
15. How often do you survey and monitor?
16. Is there a way to look at LTS as a whole to understand how it fits together?
17. Are there plans to release any site areas to the public in the future?
18. How can we be sure there will be funding to do this work? Can you really be sure you will have funding?
19. Historically there has not been a lot of trust between the public and the DOE. You have a real problem with public trust. The public has not always been informed.
20. Most DOE documents are not easily readable. Are you going to include a “lay” person to review this document? You need to summarize for the public what the document actually means. You’ll never gain the public’s trust without understandable documents.
21. The INEEL used to be the lead for cleanup development. This technical “know how” seems to have disappeared. We don’t think you can maintain that status without an adequate research and development (R&D) program.
22. Is there a timeline for getting comments back on the Implementation Plan? Will you have a workshop or public meeting to discuss comments?

D-1.11 Citizens Advisory Board Meeting — 7/15/03

1. Some of the strategic objectives say that things will be done and others state that things could be done. Is this really what you want to say?
2. When does LTS begin with respect to completion of a remedy? The board liked the reference to end state. What does “current position” mean?
3. Is the land management plan the same thing as the comprehensive facility and land use plan (CFLUP)?

4. Are you interested in cultural and natural resources in contaminated areas or the whole site?
5. How will things be handed off from EM to NE? Will the hand-off be after cleanup is complete? Will NE accept things “as is”? What is the expectation of how smooth the transition will be?
6. Who will own LTS from 2012 to 2035?
7. The strategic objectives seem so broad. Identifying performance measures may be difficult.
8. The Bureau of Land Management (BLM) or others may have natural resources plans. Does INEEL have a land management plan? Is DOE responsible for preparing a land management plan?
9. Will EM really own environmental cleanup until 2035?
10. How will the strategic objectives be enforced?
11. What happens if there is no funding for LTS?
12. The language in strategic objective 5.1 is discouraging because there doesn't appear to be much commitment to incorporate LTS needs into procedures.

D-1.12 Arco City Council Meeting — 7/28/03

1. Have you established a way to determine where contamination is left in place?
2. Have you established a baseline for the groundwater and the subsequent monitoring?
3. Are you also monitoring surface contamination?
4. There is a concern that during a fire, contamination could become airborne.
5. Could the surface areas that have contamination be capped with gravel?

Appendix E
List of Public Comments

Appendix E

Public Comments on the Draft LTS Implementation Plan

Comment Number	Comment
1	The INEEL CAB recommends the incorporation of measurable performance objectives into the Long-Term Stewardship Program
2	What level of consultation will DOE-ID conduct with the Shoshone-Bannock Tribes? Before DOE-ID makes any final decisions regarding land use on the INEEL, it must conduct high-level consultation with the Tribes. Government-to-Government consultation will more than likely be required, Section 3.D. of the AIP.
3	Section 5.1.1. Paragraph that begins with “Management systems at the INEEL...”), 4th sentence. The INEEL Architectural Properties Management Plan and the INEEL Cultural Resource Management Plan (APMP) are both draft documents. They should be noted as such. In addition, the Programmatic Agreement is not final and has not been signed by the SHPO and Advisory Council. This sentence should state that DOE-ID is in the process of getting the APMP and PA finalized. This change should also be made on page 12, regarding these documents.
4	Section 5.1.3, 1st paragraph under status. I’m sure that the INEEL did not identify about 100bird, 70 mammal, and 23 amphibian and reptile species in the Great Basin, which is a great expanse that includes the INEEL. The number of species was probably identified by some other Federal agency, like the USFWS or BLM. Suggest that this sentence be revised to accurately reflect the relationship between the INEEL and the Great Basin. In any case, it would be helpful to mention or describe the Great Basin area and how the INEEL fits into it. Although there are currently no Threatened or Endangered species on the INEEL, it should be noted that there are efforts by conservation groups to list the Sage Grouse on the Tand E species list. If this happens, it will have an impact on how the Sagebrush Steppe reserve is managed.
5	Section 5.1.3. Begins with “In 1999, a portion...”. Suggest replacing “a portion” with “approximately 73,263 acres”
6	Section 5.1.3, Change the DOE-ID cultural research coordinator to the DOE-ID Cultural Resources Coordinator.
7	Future Implementation Opportunities. The long-term stewardship program will develop a cultural resource surveillance and monitoring plan. What does this mean? What personnel make up the LTS program? Will a member of the DOE-ID M&O contractor’s Cultural Resource Management Office (CRMO) be part of the LTS program, or will the cultural resources work be contracted out to a sub-contractor or another Federal agency? If the CRMO is not part of the LTS program, then a member of the CRMO should provide input to the plan with concurrence by the DOE-ID cultural resources coordinator. I recommend that a member(s) of contractor CRMO be part of the LTS program or offer input into the plan. Whoever develops the plan will need to consult with the Idaho SHPO and the Tribes.

8	Consider adding a Performance Objective to eliminate conversion of sagebrush steppe ecosystem to a non-native invasive plant community
9	Develop a baseline invasive plant species map as part of the ecological resource management plan to implement the previous suggestion.
10	Reduce number and size of invasive plant species infestations on the INEEL when compared to baseline invasive plant species map to implement the suggestion in comment 8.
11	<p>The fact that the government finds it necessary to even put this question before the public makes me extremely suspicious. There should be no question about the government's responsibility to insure that "cleanup measures remain protective of human health and the environment" . . . but, in my opinion, your track record to this point remains less than stellar.</p> <p>Your most recent attempt to reclassify the existing radioactive wastes and ultimately allow them to remain buried, posing a potential future disaster in contaminating the Snake River aquifer, is but an example of your past "stewardship". You should be setting a defining example as a responsible landlord so that if/when these lands are abandoned or returned to the State of Idaho, there is no question about future generations suffering from your intentions. Expedient solutions, shaped to satisfy current industry greed, should not be a consideration . . . regardless of the cleanup cost!</p>
12	The Department of Energy should select remedies that protect the long-term safety and health of the community and of the environment surrounding the Idaho National Engineering Laboratory and other DOE facility.
13	The DOE should consider all aspects of establishing, maintaining and ending long-term stewardship activities during the remedy selection process.
14	The DOE should compare the costs of immediate cleanup with those of long-term monitoring and maintenance through independent cost-benefit analysis.
15	The DOE should clean up facilities to a level that allows unrestricted use and avoids the need for LTS whenever possible.
16	The DOE should immediately explain the relationship between its LTS plans and its risk-based end states initiative.
17	Where full cleanup to unrestricted use is not practical due to current technical constraints, the DOE should include details of a complete protection plan in remedy decision documents.
18	The DOE must aggressively pursue new clean-up technologies for sites where contaminants are slated to remain in place.
19	The DOE should fully characterize, disclose, and document the location of all residual contamination and make those records readily accessible to the public, for instance by placing complete records of contaminants on file with regional libraries and state archives.
20	The DOE should compensate local governments for the costs of emergency response staff, training, protective equipment, and retention of information about the nature of remaining contaminants.

21	The DOE should adopt financial assurance mechanisms to ensure adequate funding for long-term environmental protection.
22	The DOE should design contingency plans at the time cleanup decisions are made.
23	What does it mean that the Old Waste Calciner becomes a long-term stewardship responsibility after it receives its post-closure permit? For instance, what effect will it have on establishing the baseline and monitoring for contaminants in the perched water? What will be LTS's relationship with Idaho's Department of Environmental Quality? Will the records be in the CERCLA-mandated administrative record?
24	Why aren't RCRA sites and facilities included in the Comprehensive Facility and Land Use Plan? Is it still accurate that the CFLUP will be available on the INEEL web page? What are the differences between the publicly available CFLUP and the controlled version?
25	The Alliance strongly urges a well-thought-out and aggressive communication plan for the comprehensive five-year remedy review process. The Alliance volunteers to help design such a plan.
26	5.3.1 This draft rightly acknowledges that electronic document management systems are "vulnerable to outdated technology." We commend LTS's intention to design an information management plan that includes data migration strategies. We further encourage LTS to maintain the information on acid-free paper.
27	What does "environmental management style" (23) mean?
28	We are concerned by the frequent references to and acceptance of funding and resource limits and uncertainties. Long-term stewardship of the risks caused by nuclear weapons production is the quintessential federal responsibility. What kind of "outsourcing of long-term stewardship activities" is contemplated?