



Recommendation No. 101

September 28, 1999

Accelerating Cleanup: Paths to Closure

Background

The purpose of the National and Savannah River Site documents, Accelerating Cleanup: Paths to Closure (ACPC), is to provide an integrated path forward for cleanup of DOE sites in the Environmental Management Program. Discussion drafts were published in June 1997 and released for public comment. The SRS Citizens Advisory Board (CAB) provided comments on the National and Savannah River Site discussion drafts in Recommendations Number 41 (July 22, 1997) and Number 58 (May 19, 1998).

The majority, but not all, of the comments in CAB Recommendations 41 and 58 were considered and responded to by DOE-HQ; however, we still do not feel that our concerns were adequately addressed. The SRS CAB appreciates the September 2, 1999, letter from Gene Schmitt, Acting Deputy Assistant Secretary for Site Operations; however, we remain concerned that the future versions of the ACPC will not incorporate many of our previously noted important issues.

Comment

While the Paths to Closure is only the Environmental Stewardship program, there are other stewardship programs that are critical to the national interest. All of the stewardship programs should be integrated during the decision making process.

Recommendation

The SRS CAB repeats its recommendation that DOE:

1. Provide adequate funding to SRS to support the ACPC activities. In FY 1999 there was a \$116 million shortage in the SRS budget, and the assumption of being able to make up the shortfalls in funding in future years is not realistic. This comment was included in Recommendations 41 and 58; it is being repeated because the SRS CAB considers its resolution vital to the success of the ACPC. In the July 1999 draft of the SRS Paths to Closure, it was stated that the site needs will exceed funding projections by \$200 to \$300 million per year.
2. Contingency plans, schedules and costs were not included in the ACPC for 'show stoppers' because of time and resource constraints (Recommendation 58). Yet we still believe that contingency plans and associated costs should be developed for major 'show stopper'. They do not have to be detailed; however, if they are not included, it appears that DOE is putting all of its eggs in one basket without any thought to the future if that basket fails.

References

1. Letter to Ms. Ann Loadholt from Mr. Eugene C. Schmitt, September 2, 1999.
2. CAB Recommendation 41, Comments on the National and SRS Accelerating Cleanup: Focus on 2006 Discussion Drafts, adopted 7/22/97.
3. CAB Recommendation 58, Accelerating Cleanup: Paths to Closure, adopted 5/19/98.

Agency Responses

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