



## **SRS Citizen's Advisory Board**

### **Savannah River Site Citizens Advisory Board**

#### **Recommendation 208 SRS Artifact Storage and Long-term Records Management**

##### **Background**

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 of Energy (DOE) shifted from weapons production to other missions such as environmental management, weapons dismantlement, and science and technology research.

The National Historic Preservation Act (NHPA) of 1966, as amended through 2000, requires that all Federal agencies consider the impacts to historic properties in all their undertakings, such as accelerated clean up. DOE-SR has been consulting with the South Carolina State Historic Preservation Office (SHPO) on NHPA. SHPO is the implementing agency for NHPA in South Carolina. Compliance with NHPA is usually done in three steps: 1) inventory resources; 2) evaluate for National Register eligibility; and 3) avoid or mitigate effects to historic properties. DOE-SR inventoried 732 facilities, all of which were constructed between 1950 and 1989. Two hundred and thirty-three SRS structures are considered historic. Eleven properties are also individually eligible. As part of the accelerated clean up, DOE-SR has developed an SRS Cold War History Programmatic Agreement (PA) to meet the requirements of NHPA, as defined in the Protection of Historic Properties regulations (36 CFR 800) (Ref. 1).

As part of the PA, SRS has prepared a Cold War Cultural Resources Management Plan (CRMP) which contains the process for reaching decisions concerning the future treatment of SRS Cold War NRHP-eligible historic properties. Efforts are underway to identify, collect and store artifacts. Currently small and medium sized artifacts are stored in Building 105-C which does not fully meet curation standards (30 CFR 79). Work is also underway through the local Citizens for Nuclear Technology Awareness (CNTA) to create a non-profit corporation, the SRS Heritage Foundation, as a 501(c)3 educational (non-lobbying) group, to open a facility called the SRS Heritage Center. When funds for the Center are secured, then it will be a permanent place for displaying the SRS artifacts.

SRS Records Administration plays a critical role in keeping site history alive. This group helps select artifacts and identify records for retention. Records and artifacts differ in that a record is the documentary content and the artifact is an object (drawing, model, etc.) of that content. Records management practices are critical to the functions of Federal agencies because records provide information about, or evidence of, the organization, functions, policies, decisions, procedures, operations, or other activities. Therefore, the information generated by an agency is created, maintained, and dispositioned through records management processes that ensure the appropriate preservation and retrieval of essential information. SRS Records Administration is a leader in DOE's record management and has received several prestigious awards (Ref. 2).

##### **Comment**

The SRS Citizens Advisory Board (CAB) is very supportive of the SRS Heritage Center and is interested in the collection and storage of important SRS artifacts. The SRS CAB is concerned about the current storage condition of the SRS artifacts. With the potential for a lengthy time frame before the SRS Heritage Center is suitable as the permanent storage location, deterioration and destruction of these important artifacts is an immediate and real possibility. In addition, fully integrating the artifact selection walk-throughs in the D&D process should be

a priority to prevent the unnecessary destruction of potentially overlooked artifacts.

The SRS CAB believes that SRS has a strong and capable records management program. However, the unknowns associated with records management after site cleanup activities are complete are of major concern to the SRS CAB. The SRS CAB understands that the Office of Legacy Management at DOE-Headquarters is responsible for ensuring that departmental post-closure long-term responsibilities resulting from the nuclear weapons production and the Cold War legacies are met. In addition to these programmatic functions, Legacy Management will inherit regulatory and legal responsibilities for the management of SRS records (i.e., GPS location of closed waste units and D&D facilities).

The SRS CAB has many questions regarding this transfer and the availability of records hundreds of years from now. How will the local community get access to these records? How will Legacy Management keep updated on records management technology? How will the local stakeholders be involved in the transfer decisions? Will the decisions being made at Rocky Flats set a non-negotiable precedent for SRS when it transfers into Legacy Management control? Currently, there is considerable discussions at Rocky Flats concerning the legislation and guidance surrounding the establishment of the Local Stakeholders Organization (LSO). The controversy centers around who should be on the LSO – only elected officials or should it include the public (Ref. 3). If the local stakeholders are not included, how will the closure records be accessible to the public?

### **Recommendation**

The SRS CAB recommends the following:

1. By July 2005, DOE-SR upgrade the climate and temperature controlled curation needs of Building 105-C or locate and move the artifacts to another facility that currently meets these requirements and provide a qualified curator to maintain the artifacts.
2. DOE-SR provide a flow chart describing the process for integration of historical preservation activities for all facilities into the D&D schedule and present the process to the SRS CAB by May 24, 2005.
3. DOE-SR, along with Legacy Management, provide a formal presentation to the SRS CAB by May 24, 2005 concerning the transfer of SRS programmatic functions and records management to Legacy Management. In addition, describe the process for local stakeholder input into the transfer process and accessibility of closure records, including GPS coordinates for all waste units and D&D facilities.
4. As national security issues allow, DOE continue to provide public access to historical data through Internet access, via the SRS web site. DOE should brief the SRS CAB on or before May 24, 2005, on how such information can be made available to the public in a timely manner given the current security review requirements.
5. DOE expand the Cold War Cultural Resources Management Plan (CRMP) to include all eligible historic properties and not restrict the eligibility to only Cold War designated facilities and properties.
6. DOE ensure that the SRS Records Administration interacts with the Artifact Selection Team and the SRS Cold War Heritage Team and assure that historical artifacts and records receive certified archival input and oversight.
7. DOE-HQ, through congressional legislation, ensure that the public is included as members of any Local Stakeholders Organization (LSO) associated with a DOE site starting with Rocky Flats and that they have access to all available public records.

### **References**

1. Overview of the SRS Cold War built Environment Preservation Annual Summary Report – Fiscal Year 2004, presentation to the Strategic & Legacy Management Committee by Dennis Godbee (DOE-SR), January 18, 2005.
2. SRS Records Administration Helps Keep Site History Alive, presentation to the Full SRS Citizens Advisory Board by Tom McCarthy (WSRC), January 25, 2005.
3. Rocky Flats Weekly Report, February 7, 2005.

## **Agency Responses**

Department of Energy-SR

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