

Recommendation 338

Revision of the Savannah River Site Community Involvement Plan

Background

CERCLA¹ and Part 300 of the National Contingency Plan requires development of a Community Relations Plan (CRP) for removal actions where these onsite actions will last longer than 120 days. The CRP specifies the community relations activities the lead agency (DOE) plans to undertake during the remedial response. This CRP is to be based on community interviews and other relevant information gathered by DOE

In 1991, DOE conducted 85 interviews with local officials, public interest groups, or other interested parties to determine their concerns and information needs, and to learn how citizens wanted to be involved in the cleanup process. Also in 1991, DOE prepared a public involvement document called the SRS Public Involvement Plan (PIP) that was accepted by EPA and SCDHEC as meeting the requirements of a CRP.

The PIP described the community relations activities that DOE would undertake during SRS remedial responses. The PIP was based on community interviews and other relevant information gathered by DOE. In 1999, DOE modified the CERCLA community relations portion of the PIP to develop the SRS CRP. DOE currently follows the requirements established in the SRS Community Involvement Plan (CIP), which replaced the SRS CRP in 2006. The CIP provides an overall framework for community involvement, explaining the purposes, requirements, and opportunities for stakeholder involvement in SRS cleanup under the *Federal Facility Agreement* (FFA). This CIP addresses the SRS relationship with the community (Section 2.0), provides a background of the community (Section 3.0), presents the SRS community involvement program (Section 4.0), and provides a list of resources available (Appendices A-M). Section 3.3 briefly summarized CAB concerns (as of 2010), including 'Liquid Waste, Plutonium Storage, Surveillance & Disposition, Budget Development, Transuranic Waste Disposition and Canyon Utilization."

The "Community Involvement Activities" scheduled in the CIP state it will be reviewed every three years and updated "as necessary." The CIP was last updated in 2011, wherein DOE indicated it would "...host meetings and/or conduct interviews in local communities to determine community concerns ...before the next CIP revision." This planned rebaselining may include "...interviews, similar to those conducted in 1991, to discuss the types of information residents want to receive about the site, and the most effective ways for DOE to communicate that information."

Discussion

¹ The Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) established a federal government program designed to cleanup sites contaminated with hazardous substances and pollutants.

Revision of the SRS CIP is now warranted, as 25 years have elapsed since DOE first baselined its CIP, and the cleanup and waste management programs at SRS have substantially evolved since then. As of today, almost half the DWPF canisters have been filled; 8 HLW tanks have been closed; over 400 of the FFA waste units have been remediated and the backlog of TRU and Mixed wastes have been disposed. However, more recently SRS cleanup budgets are no longer keeping up with regulatory commitments; tank closure milestones are being pushed back and the pace of soil and groundwater cleanup has slowed. These achievements and problems may have changed opinions among local elected officials and SRS public stakeholders, which warrant a revised CIP.

Recommendations

The SRS Citizens Advisory Board recommends that DOE immediately initiate a rebaselining of its CIP using innovative information gathering activities including the following:

1. Announce publicly plans to update the CIP through print and television outlets, offer briefings to community organizations, and invite public comments.
2. Conduct surveys or interviews of current and past CAB members, as well as public participants in SRS' public tours of SRS, Information Pods, "Town Hall Meetings," public hearings and other public outreach venues.
3. Analyze the concerns expressed within the CAB's recommendations and position statements over the past 2 decades, as well as comments received from the public at CAB meetings and through its e-mail and social media venues.
4. Analyze concerns expressed by the public on SRS's social media sites.
5. Post the existing CIP prominently on the SRS External Web Site (www.srs.gov) and invite public comment on its revision.