



Recommendation No. 41

July 22, 1997

Comments on the National And SRS Accelerating Cleanup: Focus on 2006 Discussion Drafts

Background:

The Citizens Advisory Board of the Savannah River Site (SRS-CAB) has reviewed the National and SRS Accelerating Cleanup Plan - Focus 2006 Discussion Drafts: The Board believes that the plans are useful to stimulate discussion of issues relating to the optimization of costs and schedules. The CAB also believes that extension of the process to other DOE programs would be beneficial.

1. Both documents primarily address results that will be possible by securing the high level funding option, meeting performance enhancement challenges, maintaining level funding for the duration of the program, operating in an economy that maintains an extremely low rate of inflation (2.7% per annum) and encountering no unforeseen problems.

The SRS-CAB recommends DOE include contingency plans which indicate that some thought has been given to the operation of aged facilities, more realistic expectations, and consideration of less optimistic results. For example, the SRS-CAB recommends that a reassessment be made of the assumption that continuous productivity improvements at DWPF can be maintained into the future. (National and SRS Discussion Drafts)

2. The documents must sell their goals and the benefits of providing the resources and making necessary tough decisions to meet those goals to the public and to State and Federal governments. The documents are not currently written to convince the public or legislators of the need to implement the initiatives. (National and SRS Discussion Drafts)

3. The documents should contain executive summaries which present DOE's commitment of who will be responsible for meeting specific goals within cost and schedule limits. Elimination of superfluous wording will aid in producing a more "user-friendly", cohesive document. (National and SRS Discussion Drafts)

4. The SRS-CAB recommends that the documents address final end-states, or identify those programs with uncertain end-states and clearly state the uncertainties and the issues that need to be resolved. For example: Potential new missions may require utilization of existing facilities now scheduled to be deactivated. (National and SRS Discussion Drafts)

5. In the National Draft's Attachment F, the introduction contains the following sentence: "Each Action Plan describes in detail how the Department intends to resolve an issue, clarifying the decision to be made, the decision maker, opportunities for public involvement in the decision process and the schedule for resolution." This sentence expresses exactly what the SRS-CAB

anticipates will be incorporated in both site and national action plans. (National and SRS Discussion Drafts)

6. The SRS-CAB is very apprehensive about privatization initiatives and strongly recommends DOE approach them with a great deal of caution. Risks to humans and the environment due to lowered standards of safety, security or environmental protection are unacceptable. Economic and technical viability of privatization initiatives must be proven and reviewed with the public prior to funding such ventures. (National and SRS Discussion Drafts)

7. In response to the request for comments on Strategic Approaches outlined on page ES-10 of the National Discussion Draft, the Board recommends the following:

1. Reducing risk is the top priority and should be the primary strategy.

The other approaches:

2. Accelerating cleanup
3. Meeting compliance agreements
4. Reducing mortgages
5. Deploying innovative technology

are secondary means to the end of reducing risk rather than independent strategies of their own. Thus, they should be employed as necessary to make risk reduction quicker, cheaper, or more effective. (National and SRS Discussion Drafts)

8. The SRS-CAB recommends that the plans recognize the probability of NRC regulatory oversight sometime before 2006 and evaluate the effect of this change on both schedule and costs. Experience from other sites should be included in the evaluation. (National and SRS Discussion Drafts)

9. DOE should provide opportunities for National review and consensus on Complex-wide issues. Advisory boards and other stakeholder groups should be included in designing this process and identifying appropriate representatives who will report back to the local stakeholders. (National Discussion Draft)

10. SRS CAB members and other stakeholders should be involved in providing input to operations and allocations of funds at other sites and other programs having potential impact on SRS. Several such issues have been identified in Table F-1 of the National Discussion Draft. (National Discussion Draft)

11. The SRS-CAB should participate in the regulatory "workouts". The SRS-CAB will be involved in the outcomes, so representation during the negotiations is appropriate and desirable. (SRS Discussion Draft)

12. The documents should be "reader-friendly", cohesive and easy to follow. The drafts (National and Site) do not agree. For example, SRS draft Section VII-5 has the canyons being available "until at least 2008", while all other sections have the canyons down in 2000 and 2004. The "apple pie and motherhood" statements which introduce many sections are unnecessary and lessen the credibility of the document to the serious reader. (National and SRS Discussion Drafts)

13. Given the complexity of the document and the issues being debated, the present schedule suggests DOE will have an unacceptably short time frame to produce reasoned documents. (National and SRS Discussion Drafts)

Agency Responses

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