



Recommendation No. 48

November 18, 1997

Complex Wide Environmental Management Integration **(EMI)**

The Savannah River Site Citizens Advisory Board heartily endorses the DOE Accelerated Clean-Up Plan (ACP) and the EMI¹ initiative. We believe implementation of the EMI is necessary to the success of the ACP. We believe that now is the time to reach a national accord on the ACP and on the EMI. Our previous motion supports this need². Much of the savings in time and money to be realized through the EMI involve arrangements between various DOE sites. This raises issues which have to be resolved by DOE-HQ or between directly affected states for a particular action in the EMI. In both cases, proactive and timely leadership is necessary from DOE-HQ.

Issues such as standardization of characterization methods, consolidation of national and local procurement practices, changes to transportation systems and regulations for transuranic waste, changes in Waste Isolation Pilot Plant Waste Acceptance Criteria, establishment of uniform clean up standards for environmental restoration and establishment of de minimis levels can only be resolved with active leadership from DOE-HQ.

An obvious consideration in implementation of the EMI is addressing and resolving concerns of stakeholders and political leaders regarding state equity issues for particular proposed actions in the EMI. Detailed costs need to be developed as a basis for evaluation of particular proposed actions in the EMI but they can not be done in isolation without resolution of the political, regulatory and equity issues.

Therefore, the Savannah River Site Citizens Advisory Board recommends that DOE-HQ:

1. Move aggressively to resolve nation-wide issues such as standardization of characterization methods, consolidation of national and local procurement practices, changes to transportation systems and regulations for transuranic waste, changes in Waste Isolation Pilot Plant Waste Acceptance Criteria, establishment

of uniform clean up standards for environmental restoration and establishment of de minimis levels,.

2. Resolve equity, regulatory and political concerns among the states by working at the highest levels of state government to obtain buy-in to the EMI.
3. Encourage the local DOE sites involved to work at the local political and stakeholder levels to obtain buy-in to the EMI.
4. Include in the EMI plutonium and uranium disposition. This should be done for completeness. Other documents address this but a DOE integration plan should also include it; the public does not recognize the differences caused by DOE organizational structure.

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1. A Contractor Report to the Department of Energy on Environmental Management Baseline Programs and Integration Opportunities (Discussion Draft), May 1997
 2. Savannah River Site Citizens Advisory Board Recommendation 45, July 22, 1997

Agency Responses

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