



Department of Energy
Savannah River Operations Office
P.O. Box A
Aiken, South Carolina 29802

FEB 04 2000

Ms. Ann Loadholt, Chair
SRS Citizens Advisory Board
P.O. Box 365
Barnwell, SC 29812

Dear Ms. Loadholt:

SUBJECT: Citizens Advisory Board (CAB) Recommendation No. 115, SRS Strategic Plan, dated December 13, 1999

Thank you for submitting the subject recommendation on the December 1999 draft 2000 SRS Strategic Plan (Plan). We have considered each of the comments and made changes in the draft Plan as appropriate. Below is a response to each comment.

Comment 2. From the references made to top-level strategic documents throughout the Strategic Plan (i.e., "SRS Defense Programs Strategic Roadmap," "Natural Resource Management Plan," "Phased Canyon Strategy," etc.), it appears that the Strategic Plan is only one of many top-level strategic plans. It is unclear how this reported "top-level" document could have requirements that tier from other SRS documents.

Response: The SRS Strategic Plan is the Site's top-level strategic document. Other plans referenced in the SRS Strategic Plan are lower-level documents used to further define and provide more details on how SRS strategic goals and objectives will be implemented. The specific reference to the SRS Defense Programs Strategic Roadmap has been eliminated. Definitions for the "Natural Resource Management Plan" and the "Phased Canyon Strategy" have been included in the Plan's Glossary.

Comment 3: For the past three years, the SRS CAB has been concerned about the majority of needed infrastructure improvements falling below the cut line in SRS's annual budget with only the most important infrastructure projects receiving funding. Inconsistencies between the budget and the Strategic Plan infrastructure priorities need to be corrected.

Response: We agree there is a need to establish a stable and consistent long-term budget strategy for infrastructure improvements and have included this as Strategy EM 3.1.2 in the Environmental Stewardship section of the Plan. To move this strategy forward, the Site is working with the Department of Energy Headquarters Office to establish an Infrastructure Restoration Line Item Project for inclusion in the Fiscal Year 2002 budget. This proposed 10-year project will address major aspects of infrastructure at SRS.

Ms. Ann Loadholt

2

FEB 04 2000

Comment 4: There is a concern in the stakeholder community that not enough emphasis is placed on the final disposition of waste and excess nuclear materials in both the Environmental Stewardship Program and the Nuclear Materials Stewardship Program in the Strategic Plan. The Plan does emphasize, and rightly so, the temporary, interim, and long-term processing, handling, and storage of waste and excess nuclear materials; however, additional emphasis is needed to reinforce the urgency of final disposition of this waste, as well as, excess nuclear materials. This concept is supported by the SRS CAB Recommendation #23 which states: "One issue that concerns SRS Stakeholders is that various wastes are coming to SRS for temporary, interim, and long-term storage with no provision for final disposal. The board encourages DOE to pursue permanent storage with vigor".

Response: Establishing clear disposition pathways for wastes and nuclear materials originating from or coming to SRS is a high priority. We are committed to working with Department of Energy Headquarters Office, other Field Offices, and the State of South Carolina to ensure an off-site disposition path for waste forms such as high-level waste and transuranic waste and nuclear materials. We are also committed to finding mutually acceptable solutions for disposition of low-level and mixed, low-level wastes. The *Future Challenges* section of the Plan has been revised to clearly reflect this commitment. We are currently working with the South Carolina Governor's office to develop a comprehensive plan for SRS. The comprehensive plan, which will be shared with the CAB for comment, will address issues related to the disposal pathways and schedules for wastes and nuclear materials. We also have added Strategy ES 1.1.5 under Goal ES 1 in the Environmental Stewardship section of the Plan that reads "Ensure SRS HLW and other waste forms such as transuranic waste are included in all planning efforts for off-site federal repositories to limit interim storage at SRS."

Comment 5: Another stakeholder community concern is the management of SRS forestland, specifically the reference to Sustainable Forest Management in the Strategic Plan. The multiple-use forest management tools used to support ecosystem health and bio-diversity go well beyond those listed in the Strategic Plan.

In addition, the "SRS Natural Resources Management Plan" is not consistent with the principles of Sustainable Forest Management. Update and improve the discussion on principles of Sustainable Forest Management to SRS natural resources.

Response: We agree that ecosystem health and bio-diversity go beyond timber harvesting practices. To ensure clarity, we have added a definition of "sustainable forest management" to the Glossary in the Plan. The Plan supports the multiple use concept within the context of ensuring that site missions are balanced with the stewardship of natural resources, and the appropriate level of public access. The *Future Challenges* section of the Strategic Plan has been revised to clearly reflect this commitment. We also recognize the current SRS Natural Resources Management Plan is out of date. It is being revised to better reflect the principles of sustainable forest management. We have revised Strategy ES 3.2.3 to now read the "Revisions to SRS Natural Resources Management Plan will be developed in cooperation with stakeholders."

Ms. Ann Loadholt

3

FEB 04 2000

Comment 6: The SRS CAB acknowledges the principle of maintaining effective stakeholder relationships in all stewardship missions. While the CAB acknowledges the effectiveness of stakeholder involvement in the Environmental Management (EM) programs at SRS, it is not true for other programs like Defense Programs and Material Disposition. Include strategic requirements to ensure all programs have effective communication with SRS stakeholders.

Response: SRS is committed to providing opportunities for stakeholder involvement in our decision making processes. DOE's Office of Environmental Management is the only DOE program that has established site-specific advisory boards like the CAB. However, each program develops public participation plans that identify opportunities to provide information to the public or to request their input to a decision, including a range of activities such as informational briefings, public meetings, activities under National Environmental Policy Act, and others. We will continue to ensure open, ongoing communication and involvement in SRS programs and decisions over the months and years ahead.

Comment 7: Address Decommissioning and Decontamination (D&D) objectives and strategies of surplus SRS facilities in the Strategic Plan.

Response: We have addressed D&D of surplus SRS facilities several places in the Strategic Plan. Environmental D&D activities are addressed by Objective ES 2.2 in the Environmental Stewardship section of the Strategic Plan. Objective ES 2.2 is included to ensure environmental protection activities are taken prior to excessing facilities and that, to the degree possible, funding beyond regulatory requirements is available to mitigate possible future environmental concerns. If the areas are considered inactive units, Objective ES 2.1 in the Environmental Stewardship section addresses releases to the environment. Also, Strategy CM 3.1.5 addresses the planning required to determine what facilities should be excessed in the future and what needs to be done to the facilities to ensure worker safety and to protect the environment.

Thank you again for your comments on the SRS Strategic Plan. We plan to publish the updated SRS Strategic Plan in the very near future. The updated Plan provides us a base for our continuing planning process. We will continue to share our plans with the CAB and we appreciate the CAB's thoughtful input.

If you have any questions related this matter, please call me or John Pescosolido at 803-725-5590.

Sincerely,



Greg Rudy
Manager

NA-00-006