



April 30, 2003

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Mr. Weingartner:

The Fernald Citizens Advisory Board (FCAB) appreciates the opportunity to review the draft *Long-Term Stewardship Science and Technology Roadmap*. We were pleased that this document illustrates a comprehensive vision of a long-term stewardship system. Implementation of the *Roadmap*, as presented in Section 3 of this draft would provide dramatic benefits to communities that will bear the long-term risks of legacy wastes remaining at completed U.S. Department of Energy (DOE) remediation sites.

The FCAB has long maintained the view that “closure” of DOE sites does not constitute an end to the science and technology needs of those properties. As this draft document recognizes, there will be a continued need to ensure health and safety through monitoring, maintenance, and institutional controls. DOE must continue to find better technologies to contain and monitor legacy waste, even after a site has made a full transition from remediation to stewardship.

Key Capabilities 4 and 5 were of particular interest to FCAB members, because we have spent much of the past two years focused on post-closure information needs and the role of the community in the implementation of long-term stewardship. We were heartened to see that the enhancements proposed in this document matched well with the concept of Community-Based Stewardship, which we outlined in our report *Telling the Story of Fernald: Community-Based Stewardship and Public Access to Information*. As the draft *Roadmap* recognizes on page 26, local citizens and other stakeholders will play a vital role in the stewardship system. We offer three specific comments regarding the treatment of these topics in the draft *Roadmap*:

- Fulfilling the need to “interpret and display information according to the needs and requirements of diverse information users” (page 24) is key to maintaining community awareness and building stakeholders’ capacity to become meaningfully involved in stewardship. To date, however, we have seen no detailed plans for how DOE would accomplish this. The *Roadmap* should offer a few specifics on how DOE could accomplish these goals.
- We view the use of web-based systems to provide information regarding a site (page 25) as largely positive.

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For example, we have been positively impressed by the web-based records search and map-based databases developed at the DOE Grand Junction Office. However, DOE must also recognize that some members of the public do not have access to computers or are not familiar with receiving information in this manner. While web-based information systems will be a very valuable tool, they will not be a panacea for all community information needs.

- The *Roadmap* emphasizes the important role of public involvement in planning for stewardship. It also suggests that the public should be involved in the *conduct* of site stewardship (page 29). However, this draft does not provide examples of how the community should be involved in the conduct of stewardship (e.g., monitoring the integrity of certain engineered and institutional controls, developing annual budgets, or setting priorities for research).

We also would like to emphasize the importance of Enhancement 7.1, “Develop legal pathway modules to help identify potential legal strategies, assess established agreements, and develop draft alternative legal instruments.” The need to answer questions regarding liability and responsibilities is particularly time-critical for sites like Fernald, which are planned for closure in 2006. As we work towards achieving our end-state vision for the site, we will likely need to pursue partnerships with institutions outside DOE. We suspect this will be difficult, unless there is real clarity regarding roles and legal responsibilities.

Overall, we believe the *Roadmap* should be considered a valuable resource for DOE. The FCAB urges the Office of Environmental Management and soon-to-be-realized Office of Legacy Management to consider the ideas presented in the draft *Roadmap* as they set policies that will guide the transition of sites from Environmental Management to Legacy Management and the implementation of long-term surveillance and maintenance programs.

Sincerely,



James C. Bierer
FCAB Chair

cc:

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