

**PREPARING FOR LONG-TERM STEWARDSHIP:
CURRENT POLICY AND FUTURE DIRECTION**

David Geiser
Director, Office of Long-term Stewardship
Office of Environmental Management, DOE
1000 Independence Avenue, S.W., Washington, DC 20585

J. Kang
Office of Long-term Stewardship, DOE
1000 Independence Avenue, S.W., Washington, DC 20585

J. Gilman, J. Wilson
Project Performance Corporation
Fifth Floor, 7600 Colshire Drive, McLean, VA 22102

ABSTRACT

This paper describes the most recent status of the long-term stewardship program, as of January 2002. This paper, and the following discussions during the workshop, will offer an opportunity to provide feedback on the evaluation of the long-term stewardship program and the recommendations on the path forward. This will provide a unique opportunity for the audience to ask questions and fully understand the long-term stewardship program and anticipated direction.

INTRODUCTION

During the past decade, the U.S. Department of Energy (DOE) has made significant progress in addressing the environmental legacy of the Cold War. It has reduced the risks and costs associated with maintaining protective conditions across the DOE complex. However, in spite of that effort, the majority of DOE sites will not be cleaned up to the point where they can be released for unrestricted use and unlimited access. Factors such as technical infeasibility, excessive worker risk or irreversible environmental damage, and costs dictate the extent to which sites are undergoing remediation and the consequent end-states achieved. When cleanup is completed, most DOE sites will require some level of long-term stewardship to ensure protection of human health and the environment from hazards that remain after the cleanup is complete.¹ It is the role of the long-term stewardship program to ensure that all activities required to ensure protectiveness take place and that future stakeholders have access to the information necessary for them to evaluate the consequences of events and proposed changes over time.

DOE anticipates that long-term stewardship will be required at over 100 sites across the nuclear weapons complex. At some sites, such as some of the Uranium Mill Tailings Remedial Action Project (UMTRA) disposal cells, the transition to long-term stewardship activities has already taken place. At other sites, such as the Weldon Spring Site, long-term stewardship planning has

been on-going for some time as the site prepares for closure. Regardless of the nature and extent of activities that will be required at the sites in order to ensure long-term protectiveness of human health and the environment, several key issues need to be resolved. These issues range from policy issues such as who will ultimately be responsible for implementing long-term stewardship; to technical issues, such as what sort of monitoring programs are required to ensure confidence in the remedy performance in the future; to stakeholder and local citizen concerns regarding long-term stewardship activities and assurances that the sites will remain protective.

Currently, the approach to addressing long-term stewardship responsibilities is being evaluated, as mentioned in the October 26, 2001, memorandum from the Assistant Secretary for Environmental Management (EM), Jessie Hill Roberson. Part of the evaluation is to clarify the purpose of the long-term stewardship program, as well as clarify roles and responsibilities for management of long-term stewardship within the Department, both at Headquarters and the Field. This will include reviewing the approach to planning at the site level as well as transferring responsibility for long-term stewardship activities after EM's cleanup actions are complete. To date, several decisions regarding the management of long-term stewardship have been made by the Assistant Secretary for EM. The decisions focus on programmatic responsibility, composition of the Executive Steering Committee, regulatory requirements for post-closure, and coordination with national groups.

Previously, the programmatic and policy responsibilities were shared between Headquarters and the Idaho National Engineering and Environmental Laboratory (INEEL). Now, however, the programmatic and policy lead for long-term stewardship will be consolidated at Headquarters. Consequently, the INEEL will focus on the science and technology aspects of long-term stewardship.

As part of this effort, the Long-term Stewardship Executive Steering Committee will be used to evaluate and develop policy as well as prepare a strategic plan for the Department's long-term stewardship program. To enhance efficiency and effectiveness, the Long-term Stewardship Executive Steering Committee has been reduced to only eight members. The members represent a balance of Headquarters and Field personnel, depicting closure and continuing mission sites as well as Headquarters elements. The Field Long-term Stewardship Working Group will continue to identify and prepare issues for discussion and to draft the strategic plan for the Executive Steering Committee's review. The guiding principles for the development of the strategic plan will be the seven long-term stewardship management principles (see textbox).

Draft Seven Long-term Stewardship Management Principles

- (1) Long-term Stewardship is a Department-wide responsibility
- (2) Long-term Stewardship is a component of all aspects of cleanup decision making
- (3) The Department is a Trustee of natural and cultural resources
- (4) Long-term Stewardship should be incorporated into relevant Departmental policies, practices and systems
- (5) An inter-generational approach is needed for Long-term Stewardship
- (6) Long-term Stewardship policy must provide a consistent framework and acknowledge sites' need for flexibility
- (7) The involvement of stakeholders and state, local, and Tribal governments is critical to Long-term Stewardship

The Office of Long-term Stewardship lead a review of existing and proposed regulatory requirements for post-closure. The review examined three questions:

- (1) What is the post-closure regulatory framework under which we conduct long-term stewardship?
- (2) What are our current regulatory commitments?
- (3) What are our impending commitments?

This effort required coordination between Headquarters and the Field office staff to capture site requirements that apply or will apply upon cleanup completion. The information gathered during the review is being used to develop a comprehensive picture before embarking on new policy regarding post closure.

To assist the Department in shaping and implementing policies, there needs to be clear communication and proper coordination with national groups representing other governmental entities. For instance, the *National Study on Long-term Stewardship* represents an important assessment of the EM program and illustrates the public's view of issues associated with the management of long-term stewardship. Currently, the most efficient and expeditious way of working with various groups interested in long-term stewardship is being reviewed. The results of the review will be used to improve coordination with national groups representing other governmental entities.

As mentioned previously, the Department is conducting an assessment of the EM program over the next several months. Long-term stewardship issues are integral to cleanup decisions and land use planning and the Department recognizes that long-term stewardship is important for ensuring continued protection of human health and the environment. Consequently, the Department is considering additional steps to further develop policies, guidance, and procedures for planning and implementing long-term stewardship. If you have any specific comments or questions regarding the direction of the long-term stewardship program, please feel free to contact David Geiser via e-mail at david.geiser@em.doe.gov or phone at 202.586.9280 or contact Jonathan Kang via e-mail at jonathan.kang@em.doe.gov or phone at 301.903.7178.

FOOTNOTES

¹ The term "cleanup" refers to the process of addressing contaminated land, facilities, and materials in accordance with applicable requirements. Cleanup does not imply that all hazards will be removed from the site. This function encompasses a wide range of activities, such as stabilizing contaminated soil; treating groundwater; decommissioning process buildings, nuclear reactors, chemical separations plants, and many other facilities; and exhuming sludge and buried drums of waste. The term "remediation" is often used synonymously with cleanup.