

## **The EM SSAB Annual Work Plan Process: Focusing Board Efforts and Resources – 13667**

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### **ABSTRACT**

One of the most daunting tasks for any new member of a local board of the Environmental Management Site Specific Advisory Board (EM SSAB) is to try to understand the scope of the clean-up activities going on at the site. In most cases, there are at least two or three major clean-up activities in progress as well as monitoring of past projects. When planning for future projects is added to the mix, the list of projects can be long. With the clean-up activities involving all major environmental media – air, water, soils, and groundwater, new EM SSAB members can find themselves totally overwhelmed and ineffective. Helping new members get over this initial hurdle is a major objective of EM and all local boards of the EM SSAB.

Even as members start to understand the size and scope of the projects at a site, they can still be frustrated at the length of time it takes to see results and get projects completed. Many project and clean-up timelines for most of the sites go beyond 10 years, so it's not unusual for an EM SSAB member to see the completion of only 1 or 2 projects over the course of their 6-year term on the board.

This paper explores the annual work planning process of the EM SSAB local boards, one tool that can be used to educate EM SSAB members into seeing the broader picture for the site. EM SSAB local work plans divide the site into projects focused on a specific environmental issue or media such as groundwater and/or waste disposal options. Projects are further broken down into smaller segments by highlighting major milestones. Using these metrics, local boards of the EM SSAB can start to quantify the effectiveness of the project in achieving the ultimate goal of site clean-up. These metrics can also trigger board advice and recommendations for EM. At the beginning of each fiscal year, the EM SSAB work plan provides a road map with quantifiable checkpoints for activities throughout the year.

When the work plans are integrated with site-specific, enforceable regulatory milestones, they can provide a comprehensive work plan for not only the board, but also regulators, site contractors, and DOE. Because the work plans are reviewed and approved by DOE, they carry some weight in holding local boards of the EM SSAB accountable. This structure provides the basis for local boards to achieve their primary function, to provide DOE with information, advice, and recommendations concerning issues affecting the EM program at the site.

### **Development of an EM SSAB Work Plan**

The development of a work plan begins with a project-by-project overview for the site, provided by the local board's Deputy Designated Federal Officer (DDFO). This overview includes a timeline for each project as well as major regulatory milestones. As the timeline and milestones

are presented, EM SSAB members can ask questions, including process-oriented ones, such as, “When would a recommendation to DOE be most appropriate and beneficial?” The earlier a recommendation is offered in the process, the more time DOE will have to evaluate it, prepare a response, and modify the project to incorporate the recommendation. Recommendations that are not accepted can initiate more educational activities for the local board members, so that they can gain a better understanding of the project and DOE’s position.

By working backwards in time from project milestones, the local board and site management can develop priorities and break complex projects into smaller segments that are easier to understand. With that understanding in mind, EM SSAB members can make more informed recommendations and focus their attention to an area that interests them. These areas of interest form the basis for the subcommittee structure that most EM SSABs develop with their work plans. Because the scope of projects is so broad at every site, the best way to get EM SSAB members engaged is to encourage them to select a subcommittee that best matches their interest. Serving on a subcommittee helps to focus their attention and knowledge. This knowledge base will then serve the EM SSAB well when advice and recommendations are considered for the project area.

Development of a EM SSAB work plan can be very straightforward following the project plans presented by EM site management. Opportunities to offer advice and recommendations arise as the details of the plan become apparent. Alternatives developed in a proposed remediation plan, for example, may include all the requirements included in the regulatory process, but may not have taken into consideration some community concerns about the action. A timely recommendation from the board in this case could resolve potential controversies before project planning is completed, which can be a very satisfying outcome for an EM SSAB interested in streamlining the public-input process.

In some cases, the site management plan and presentation may not cover an issue that an EM SSAB feels is important. Because there are so many unknowns involved, future land use and long-term stewardship of a site is one of the most difficult issues for an EM SSAB to consider. This issue can also be in conflict with the EM goal to “reduce the footprint of the site” and give it back to the community. In some cases, the priorities to remediate a site and provide proper disposal of the waste can overwhelm softer issues such as the importance to a community of historical preservation of the site and artifacts of work that was conducted at the site. DOE has a good track record of recognizing the historical significance of sites that supported the Manhattan Project back in the 1940’s. Sites developed after the Manhattan Project, however, may be classified and not recognized as part of our country’s nuclear legacy.

A good example of an EM SSAB initiated historical-preservation project was the “Oral Histories” project developed by the Citizens Advisory Board (CAB) at the Paducah site. As the work force at the site aged, retired, and started to die, one CAB member could see that the history and personal stories of the workers at the Paducah Gaseous Diffusion Plant site were being lost. In this case, the CAB member took it upon herself to initiate a program to record interviews with retired employees to capture their stories on video. At some point, these oral histories will be edited and compiled into a comprehensive documentary for the Paducah site. The ultimate goal would be for these oral histories and other materials to be showcased for the

public in a visitor's center at the site after the uranium enrichment process has been shut down. Building a visitor's center to preserve an historical archive of the activities at the site would be a legitimate future use of the Paducah site.

By negotiating with site management, the Paducah CAB was able to include this project in the EM SSAB Work Plan. After a subcommittee was established to monitor the activity, the scope of the project was expanded to include the publication of a book celebrating the history of the Paducah Gaseous Diffusion Plant and its contribution to winning the cold war. These kinds of projects directly benefit the community and stimulate CAB involvement and interest.

### **Implementation and Assessment of EM SSAB Work Plans**

Once the local board's work plan has been developed and approved, implementation begins. Because each of the EM sites has been working on their clean-up programs for many years, a new board work plan, in many cases, becomes a continuation of the last work plan rather than an entirely new plan. The plans are coordinated with cleanup activities at the site, which are driven in large part by the EM Federal Facility Agreement (FFA) for work at the site. Unlike the FFA, however, which holds EM accountable for progress, the board is not held strictly to the work plans by the agency, which monitors progress but allows for deviations resulting from shifts in board interests as well as changes in the cleanup schedule.

In many cases, when delays are introduced into a project either through the regulatory process, budgeting constraints, or other factors, the local board work plan must update its work plan timelines and to reflect the new dates for the milestone. This activity can become a frustrating exercise for local boards, as they try to stay faithful to the original work plan in order to accurately plan their work. The importance of regular assessments of the work plan, therefore, cannot be overemphasized. Without these processes, the work plan can become just another document on shelf.

Periodic assessment of the work plan becomes an important EM SSAB function during the course of a year. The Paducah CAB, for example, performs this assessment by making the work plan a standing agenda item for its Executive Committee that meets monthly. The Paducah CAB Executive Committee is composed of the subcommittee chairs, the CAB chair, and vice-chair, as well as key DOE people and contractors at the site.

As it is currently written and approved, the Paducah CAB Work Plan has no specific subcommittee activities beyond January 2013. One of the tasks of the Executive Committee will be to update the plan for future activities the remainder of fiscal year 2013.

In addition to periodic reviews, an annual assessment of the prior year's work plan is an appropriate exercise for the local board of the EM SSAB. This review is usually done during an extended administrative board session or "retreat". At these sessions, board members consider requests and voice issues that they would like to address in the upcoming year. The review of the past plan provides continuity from year to year.

A review of the past work plan always involves some analysis as to why a date or project milestone has slipped. Some deviations from the plan can be explained by many factors

including regulatory delay, incomplete information available, and changing budgetary priorities. For the most part, it is best not to dwell on these causes until they start to impact the enforceable regulatory milestones faced by the site. Because changing the date of an enforceable regulatory milestone involves agreement between DOE, US EPA, and a state EPA authority, meeting these dates must take priority over all the activities at the site. Any changes to these enforceable regulatory milestones must be incorporated into the Federal Facilities Agreement before they become part of the EM SSAB local board's work plan. For this reason, local boards must be flexible when developing and implementing their work plans.

## **CONCLUSION**

EM SSAB work plans provide a systematic process to help board members understand the broader scope of the EM mission at a site and plan the board's work for the coming year. By breaking down the mission aspects into smaller projects segmented by major milestones, EM SSAB members can select areas that interest them and become members of subcommittees. By specializing in an area of interest, new EM SSAB members can become productive members more quickly and contribute to the development of advice and recommendations for the full board to consider and take action. In this manner, EM SSAB members can achieve the primary goal under FACA—to provide valuable, independent input to the agency—and feel productive in the process.

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