

USING THE INEL SITE-SPECIFIC PLAN AS A COMMUNITY RELATIONS TOOL

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ABSTRACT

Idaho National Engineering Laboratory (INEL) activities have affected, or have the potential to affect the environment. For this reason, the issues surrounding INEL activities are of interest to a broad range of people. The preparation of the INEL Site-Specific Plan (SSP) reflects the U.S. Department of Energy Idaho Field Office's (DOE-ID's) initiative for open and clear communications with the public. The INEL SSP describes for the public DOE-ID's plan to clean up inactive facilities and locations that were contaminated due to past waste management practices. It also discusses waste management strategies for avoiding future contamination by active operations. The SSP is an over-arching document and supplies "the big picture" of environmental restoration and waste management activities to the public, including budget information and long-range plans.

DOE-ID has been using the INEL Site-Specific Plan and its associated public comment period as a primary tool for public involvement and as way to get meaningful citizen input into DOE-ID planning.

Public involvement in the INEL Site-Specific Plan has four main objectives:

- To inform public officials, Indian Tribes, interest groups, businesses, and individuals about current plans for environmental restoration and waste management activities at INEL;
- To ensure that public concerns and interests relating to environmental restoration and waste management are reflected in the SSP and DOE-ID planning;
- To provide flexibility so modifications can be made to DOE-ID plans and the SSP in response to changing concerns within the community; and
- To ensure that DOE-ID and INEL contractors are given feedback regarding public interest in, and concerns about, the DOE-ID's plans.

To carry out these objectives, DOE-ID has implemented an aggressive public outreach effort that provides multiple opportunities for public participation in cleanup and waste management decisions.

BACKGROUND

INEL is one of U.S. Department of Energy's (DOE's) principal centers for conducting nuclear energy research and development. The facility covers nearly 231,000 hectares (890 square miles) of dry, cool desert. It was established in southeastern Idaho in 1949 as a site where nuclear reactors, support facilities and equipment could be safely built and tested. Currently INEL's primary mission is to serve as a research and development facility; but other missions with broader emphasis on defense have been proposed.

During four decades of operation, many different types of radioactive and hazardous substances were produced and managed in accordance with the standards of the time. Unfortunately, waste handling and disposal techniques of the past have left a legacy of environmental contamination. The DOE-ID Environmental Restoration Division is responsible for addressing problems associated with environmental contamination. The primary goal of environmental restoration is to protect human health and the environment posed by contamination that is present due to past practices. This is done by taking contamination from an uncontrolled situation to a controlled situation through treatment, stabilization, and/or removal.

The DOE-ID Waste Management Division is responsible for treatment, storage, and disposal of wastes in accordance

with applicable environmental laws. Wastes under the Waste Management Division's jurisdiction include those generated by ongoing operations at the INEL, as well as wastes generated by decontamination and decommissioning and environmental restoration activities. As the environmental restoration program matures, the volume of these wastes will dramatically increase requiring new facilities for treatment storage and disposal. Additionally, because of INEL handling, testing, and storage capabilities, it historically has become a primary location for receipt of radioactive waste from out-of-state sources for disposal or temporary storage until viable repository disposal options become available. The Waste Management Division is responsible for the treatment, storage, and disposal of these stored wastes (except for buried waste which falls under environmental restoration buried waste program.) Much of this waste is transuranic waste and is ultimately destined for the Waste Isolation Pilot Plant.

For the most part, viable, proven technologies exist for environmental restoration and waste management activities at INEL. As an example, mining-based separation technologies can be used on radioactively contaminated soil and vapor vacuum extraction is a technology that has been utilized at INEL to remove solvent vapors from the subsurface. However, not every environmental restoration or waste management challenge at INEL can be addressed with existing technology. New or improved technologies to more effectively

treat and clean up wastes at INEL are being developed by DOE-ID's Technology Development Division. The primary mission of this division is to develop new technologies and improve current technologies for waste retrieval, stabilization and treatment more efficiently and with improved operational safety and reduced waste volumes.

THE FIVE-YEAR PLAN AND THE SITE-SPECIFIC PLAN

In 1988, the Office of Environmental Restoration and Waste Management (EM) was established to administer and oversee the management of wastes generated by DOE operations throughout the DOE complex and ensure that they are managed in accordance with applicable regulations and DOE directives. The EM organization also oversees the cleanup efforts that are required to address contamination that resulted from past practices.

In March of 1989, Secretary of Energy James D. Watkins told the American public that DOE would clean up its nuclear waste sites. Six months later, DOE Headquarters issued the national Environmental Restoration and Waste Management Five-Year Plan (Five-Year Plan) describing a prioritized list of actions and a goal for completion of all cleanup activities for the entire DOE complex by the year 2019. The Five-Year Plan is updated each year to reflect changes in planning for environmental restoration, waste management, and technology development activities throughout the entire DOE complex.

At the same time the Five-Year Plan was released, each DOE field office was directed to prepare a Site-Specific Plan (SSP) for its environmental restoration and waste management activities. The SSPs for each DOE field office are also updated each Federal fiscal year (FY). The INEL Site-Specific Plan shows how DOE-ID intends to implement the Five-Year Plan at INEL.

The INEL Site-Specific Plan has several distinct purposes. The first is to explain how DOE-ID intends to use environmental restoration and waste management funds that have been requested from Congress. The second purpose is to outline the budget request that Congress will be debating the following year. The final purpose of the plan is to implement DOE Headquarter's Five-Year Plan as it applies to INEL and explain DOE-ID's plans to achieve improved management of waste from ongoing operations, compliance with all relevant laws and regulations, and prevention of future environmental contamination.

THE COMMUNITY

The distinct geography of Idaho has resulted in concentrations of it's population along the corridor of the Snake River. Throughout the Idaho, there is an incredibly diverse *array of people and opinions*. This is particularly true when it comes to the INEL. There are two distinct and opposing trends of criticism of DOE-ID. As you get further and further away from the INEL, critics become more vocal of DOE-ID's failure to spend enough time and money on environmental restoration and waste management. As you get closer to INEL, the criticism is that DOE-ID is spending too much time and money on environmental restoration and waste management.

The former *opinion* is rooted in a number things. First is DOE-ID's history as an agency. For the greatest part of INEL's

history. INEL operations were shrouded in great secrecy. Agency contacts with the public were minimal and the agency was less than forthcoming. Secondly, waste management practices during this time later resulted in environmental contamination. The result of these two factors is that some segments of the public have little faith or trust in DOE-ID to operate the INEL in an environmentally responsible manner. The areas of greatest areas of concern to the "pro-cleanup" community are the contamination of the Snake River Plain Aquifer, the status of buried waste at the INEL, the management of out-of-state wastes, the public role in decision-making, and concern that DOE-ID is inappropriately using cleanup funds for other purposes.

The critics of INEL closer to home are often long-standing or former employees of the INEL who feel that the situation with environmental contamination is exaggerated in the public eye. Additionally, many feel that governmental actions, particularly those that are risk-based or that are compliance for compliance sake, are unjustified and excessively costly. Additionally, many residents in communities surrounding the INEL rely on its economic influence on the economy and fear that excessive environmental concern may drive DOE away from considering Idaho for new initiatives.

THE STATE AND INDIAN NATIONS

The state of Idaho is guardedly supportive of INEL operations and activities with several areas of distinct division. In 1989, Idaho Governor Cecil Andrus imposed a moratorium on receipt of out-of-state waste. This action was aimed primarily at stopping the flow of transuranic waste from the Rocky Flats Plant. Most recently, there has been a rift in DOE and State relations over the receipt of spent nuclear fuel from the Fort St. Vrain power plant in Colorado. At issue was whether a contract DOE had with the Public Service Company of Colorado took precedence over the right of the state to refuse acceptance of the material. The State took several actions to block the receipt of waste, but a Federal court upheld the Public Service Company of Colorado's contract with DOE.

While relations between DOE and the State are not as good as they could be, this has not prevented both sides from seeking a cooperative relationship in other areas. On December 9, 1992, the Federal Facility Agreement and Compliance Order (FFA/CO) was signed among DOE-ID, the State of Idaho and Region 10 of the U.S. Environmental Protection Agency (EPA).

The FFA/CO establishes a specific process for environmental restoration that must be followed to comply with Federal laws. It lays out steps that must be followed for making cleanup decisions, including setting schedules for evaluation, characterization, and remedy selection. This schedule and process aids the three agencies in arriving at the best joint decisions. Joint decision-making is, therefore, a key strength of the FFA/CO. In addition, the FFA/CO sets up a mechanism for communication between DOE-ID, EPA, and the State of Idaho where specific projects and information can be discussed and issues can be raised and resolved in a timely manner so that cleanup can be performed as quickly as possible. Without the framework provided by the FFA/CO, interactions among the three agencies would not be as efficient. The FFA/CO has an impact on the SSP because it provides the baseline for environmental restoration activities. This aids

DOE-ID in its efforts to secure funding from Congress for cleanup by providing a solid base for budgeting and funding requests.

DOE-ID must also consider impact to the Shoshone-Bannock Reservation which is southeast of the INEL. In general, the tribe has not been an active participant in public involvement activities. The tribe, however, recently took court action to block the shipment of Fort St. Vrain spent fuel through the reservation. DOE-ID has taken steps to include the tribe in public involvement activities and will continue to seek other avenues for tribal participation in DOE-ID's decisions.

COMMUNITY RELATIONS AND THE INEL SSP

While there are many activities under cleanup laws that have required public involvement, there are very few opportunities for the public to comment on DOE-ID's waste management and technology development initiatives. For this reason, community relations on the SSP has taken on added importance.

The FY90 INEL SSP was reviewed by the general public during a 60-day public comment period (later extended to 75 days) during the months of July, August, and September 1990. Public meetings were held the first week of August 1990 in five cities -- Idaho Falls, Pocatello, Twin Falls, Boise, and Moscow. Each of these five cities had citizens actively concerned about INEL issues. The SSP meetings represented the first time a public meeting series was taken around the state. The goal of the public meetings was to provide citizens an opportunity to ask questions on the SSP, but more importantly, to provide them an opportunity to make comments for the record. A court reporter was used at each meeting for this purpose. Written comments were also taken. The result was a windfall of input ranging from comments about the organization of the document to criticism of the plans it contained.

The reaction to the first input from the public was a quick DOE-ID response to rewrite and reorganize the SSP in order to make it more user-friendly to the public. Because the purpose of the document was to relay information to the public on DOE-ID plans and budgets, DOE-ID put together a team of community relations and financial management contractors and consultants to redraft the SSP in a way that would maximize the public's understanding of the background of the INEL and the complexities related to environmental restoration, waste management and technology development. This effort was significant and took place over the course of 6 months.

At the same time, community relations staff were also preparing an analysis of public comments on the FY90 INEL SSP for the purpose of developing a response to comments document. At the public meetings DOE-ID committed to the public to provide written responses to all comments and individual written responses to all written comments. The dual role of the team to be redrafting the document at the same time public comments were being analyzed allowed an opportunity to take useful input from the public and incorporate it directly into appropriate changes.

The FY91 INEL SSP, which resulted from this effort to redraft the FY90 version, was released in March of 1991. Included as an attached appendix was a 87 page response to comments document. The usefulness of public comments

gained from this public review process was noted in the FY91 version.

Along with a list of other commitments made to the public in the FY91 INEL SSP was the commitment to provide an earlier draft of the SSP. The FY92 INEL SSP was the second revision of the SSP in the 1991 calendar year. Providing the SSP revision one year ahead provided the public with an earlier opportunity to comment on DOE-ID's plans, but also brought the SSP into phase with DOE-ID's planning. Future revisions of the SSP will continue to be released in the summer following the release of DOE-Headquarter's Five-Year Plan.

PLANNING AND PRIORITIZATION PROCESS WORKSHOP

Associated with the Five-Year Plan and the SSP was the direction to conduct a single meeting to explain the prioritization process. DOE-ID determined that given the geographic distribution of the community that has concerns about INEL, a series of informal workshops would be more appropriate and more effective than a single meeting. The concept of a workshop versus a formal meeting was born out of public input provided during the public comment period for the FY90 INEL SSP. At that time, the public expressed a desire for DOE-ID to seek more informal avenues to establish two-way communication with the public.

Initially, three workshops were scheduled for Boise, Idaho Falls, and Moscow. A fourth workshop was added in Twin Falls as a result of public requests. The workshops were publicized by issuing press releases, sending out 1,600 letters to citizens on DOE-ID's mailing list, and calling past participants of environmental restoration and waste management related meetings. A total of 61 citizen participants attended the four meetings around the state.

The purpose of these workshops was twofold: (1) to provide the community with a better understanding of DOE's process for prioritizing funding of its environmental restoration and waste management programs, and (2) to obtain public comments on public involvement opportunities in environmental restoration and waste management planning and decision-making. These workshops represented a departure for DOE-ID from the traditional formal public meetings to a more relaxed form of two-way communication with emphasis on having the public interact with each other and DOE-ID. This format allowed DOE-ID to provide information but also provided a better opportunity for DOE-ID to listen to the public.

Overall the public reaction to this approach was very positive. Most importantly, DOE-ID received a great deal of useful input. The public input from these workshops was very helpful in the development of this revision of the SSP and developing more innovative approaches to public involvement.

Comments on how DOE-ID should include the public in the decision-making process had many common themes. For the most part the public agreed that DOE-ID's current activities to include the public in the decision-making process -- public comment periods and meetings on the SSP, public comment on DOE-Headquarter's Five-Year Plan, and workshops should be continued. The primary focus of most discussions was additional things that could be done beyond DOE-ID's current program. The general sentiment was that DOE-ID needs to increase the types and frequency of public

involvement activities. The five comment areas below were pervasive throughout the different workshop locations.

- Include public in planning and decision-making process
- Improve public access to information
- Provide better preliminary information and adequate notice
- Provide more detailed information to public
- Provide Progress Reports to explain problems and update progress

PUBLIC MEETINGS AND PUBLIC COMMENT ON THE FY92 INEL SSP

To publicize the release of the FY92 INEL SSP and public comment period, a special edition of the INEL Reporter, a DOE-ID newsletter for the environmental restoration program, was prepared. It contained a letter from the DOE-ID site manager presenting a brief overview of the purpose of the SSP and invited the public to attend public meetings and participate in the public comment period. Advertisements in regional newspapers were placed on three occasions to notify the public of the series of meetings being held statewide. Personal contacts were also made with interest groups and individuals to invite their participation and explain the format of local meetings. Short news articles and radio interviews appeared several days preceding local meetings. Media representatives were invited to attend a press briefing the day of the meeting to ask questions and discuss elements of the SSP.

Five public meetings were held around the State for discussion and public comment on the FY92 INEL SSP. These meetings were held in the same cities that the previous year's meetings were held. A display was developed explaining environmental restoration, waste management, and technology development and how they worked at the INEL. The day of the public meeting, the display was taken to a local mall in the city the meeting was to be held. This was done to reach a broader audience than usually attends INEL public meetings. The display was staffed throughout the day so that public questions about the INEL could be answered in person. Public comment forms and a series of fact sheets (excerpts from the SSP) were available along with copies of the SSP itself. This approach proved successful in two ways, a different segment of the public was reached and had an opportunity to ask questions, receive information, and state their opinions about activities at INEL. This revealed a less negative image of the INEL than DOE-ID had anticipated. Secondly, the turnout at the public meetings was much larger. This was in part attributable to the efforts at the malls.

As publicized, DOE-ID and contractor staff were available the hour prior to the public meeting to answer questions about projects, plans, budgets, or the SSP itself. This "availability session" provided an opportunity for the public and staff to have a less formal dialogue about issues of concern to the public. The display provided an entré for technical staff to open conversations with the public and also was used as a visual aid for explaining projects and activities as well. In post-meeting debriefing sessions, many staff commented that the availability sessions were very effective for communicating with the public because the atmosphere was not charged, the communication was face-to-face, and people respond more positively to individuals versus agency panels.

The public meeting was conducted somewhat formally with a panel at the front of the meeting room to answer questions. After the question and answer session, a testimony portion of the meeting was opened for the purpose of receiving oral comments.

A 60-day public comment period on the FY92 INEL SSP was held from August 1 to September 30, 1991. For the purpose of receiving public comments, verbatim transcripts were taken for all of the meetings and later placed in the information repositories along with written comments. In order to prepare a more useful and responsive document, DOE-ID decided to use a comment tracking system. Written and oral public comments received on the SSP were annotated to isolate individual comments and reference where specific responses to each comment were provided. Individual comments were combined and summarized where appropriate, but all summaries retained references to specific individual comments. This extra effort provided the public better access to DOE-ID's responses.

CONCLUSION

The goal of public involvement in the SSP at INEL is the integration of the views of interested parties--interested and affected individuals, organizations, State and local governments, Indian tribes, and other Federal agencies--into DOE-ID's decision-making process. This means that public questions, concerns, and needs are identified prior to DOE-ID decisions and efforts made to include these into the decisions where possible. The extensive effort made by DOE-ID to publicize the SSP and meetings through newsletters, advertisements, radio announcements, and displays was the first step. Without this effort, public turnout would be lower and would have less breadth.

The effort to provide the public with notice on the FY92 INEL SSP was matched with a combination of different activities including displays in local malls, availability sessions, and public meetings in multiple cities. Public input was then processed in a way that made it more meaningful to both decision-makers and the public as well. By making this strong effort to be responsive, DOE-ID has validated public input thereby building credibility. This validation is further enhanced as programs show change influenced by public comments. Responsiveness builds credibility in a way no other activity can. Finally, the entire public involvement process on the SSP built on past successes and failures and input provided by the public. Many of the lessons learned (both from internal and external sources) in this round of public involvement activities will be incorporated to improve the process next year.

Public involvement efforts do not eliminate all conflicts and controversies that DOE-ID activities at INEL may inspire. The program will avoid all controversy and opposition that results when the public is not included in the decision-making process or not kept adequately informed. If public involvement in each decision is sought early in the process, and an honest effort is made to be responsive to public needs and concerns, the amount of time spent on public involvement will be balanced by the input and credibility gained. Public involvement in the SSP is intended to provide a forum for anticipating and addressing community concerns before the opportunity for constructive resolution is lost.

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