

## Chapter 7 Management Initiatives

This chapter discusses six EM management initiatives related to *Paths to Closure*: accelerated site completion targets, EM integration/planning, stewardship, annual baseline reconciliation, a pilot systems approach for enhanced baseline development, and science and technology roadmapping.

### 7.3 Stewardship

When cleanup is completed at many sites, some work will remain. The work after cleanup, often called "long-term stewardship", includes monitoring of residual contamination, and maintenance of closed landfills, capped sites, and entombed buildings/reactors. In many cases, these activities are required as part of the remedies selected (e.g., post-cleanup monitoring and five-year reviews). These stewardship activities encompass all actions required to maintain an adequate level of protection to human health and the environment posed by residual contamination. Many organizations, including state regulatory officials, Tribal Nations, and the EM Advisory Board have urged the Department to increase its efforts to meeting its obligation to ensure that these stewardship tasks are carried out fully after completion of site cleanup activities. The Department is committed to meeting its long-term stewardship obligations, which become increasingly important as more sites are cleaned up.

One step towards demonstrating EM's intent to meet stewardship obligations and to improve management of this critical activity is to identify the nature, extent, and cost of current and expected stewardship scope. To this end, EM Headquarters is recommending, but not requiring, that, at each site where substantial cleanup work has been completed (including long-term facility stabilization and landfill closure), Operations/Field Offices establish a PBS for long-term stewardship activities.<sup>3</sup> A small amount of required information is described at the end of this section.

While managers at some sites may deem it appropriate to establish a PBS for long-term stewardship now, other sites may wish to wait until more cleanup is completed, information is available, or more clear and consistent guidance is developed. A separate working group on long-term stewardship will be continuing to consider this, among other issues, through regular conference calls and a meeting in Salt Lake City in February 1999. EM understands that the experience at many sites is that the personnel most knowledgeable about the information required for a stewardship PBS may not be available when the PBS is funded. Hence, it may be preferable to establish a PBS before it is funded so that the information may be included while the expert personnel and required information are still readily available.

Although the details of how information on long-term stewardship should be collected have not been resolved, it is clear that more information on long-term stewardship is needed. First and foremost, there is growing pressure from state and federal regulatory agencies (voiced nationally by the State and Tribal Governmental Working Group and the EM Advisory board as well as the National Association of Attorney's General) to articulate and address our long-term stewardship obligations. Second, Congress is increasingly seeking details of interim cleanup progress rather than waiting until cleanup at an entire geographic site is completed. Third, EM needs information to evaluate management options for ensuring that the long-term stewardship obligations are being met in a cost-effective manner. Finally, the Department recently settled a lawsuit with a variety of non-governmental organizations. One aspect of the settlement is a requirement that DOE prepare a study on long-term stewardship, with full scoping and public participation. This study will require additional information on long-term stewardship in more detail than on

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<sup>3</sup>This recommendation differs from the draft guidance, which directed that each Operations/Field Office develop a PBS on long-term stewardship. The change reflects the comments received by a number of Operations/Field Offices indicating that a mandatory PBS for long-term stewardship was premature at this time, but that such a PBS might be appropriate later.

the geographic site level. Collecting this information may require a separate data call, if it is not provided adequately as part of data collected from this guidance.

The following guidance is for site managers who chose to develop a separate PBS for long-term stewardship. The type of information to be included in a stewardship PBS is generally expected to be the information necessary to assess the level of stewardship activity, and describe it in a comprehensive manner. Much of the information is expected to be simply transferred from PBSs for active remediation or waste management. The information would likely include:

- Description of residual contamination;
- Description of the controls being used to contain the residual contamination; and
- Description of the "afforded" future land use after cleanup is completed (i.e., what is the land use that is possible, given the level of cleanup attained).

The "unit of activity" to be transferred to a new PBS should be determined based on the needs of the site management. A PBS for long-term stewardship will reflect cleanup work that is completed, and, thus, site manager should include as much completed cleanup as soon as possible. Stewardship should not be confused with ongoing remediation or waste management of operating facilities, and establishing a PBS for long-term stewardship will help separate this work from ongoing active cleanup. Moreover, establishing a PBS for stewardship should not necessarily wait until all of the cleanup associated with an entire PBS is completed. However, it would be unworkable to transfer each individual release site to a new PBS upon completion of cleanup. EM recommends that site managers establish a PBS for stewardship when a discrete and significant management unit within a PBS (e.g., watershed, valley, or geographic area) has been cleaned up.

Pending the development of a more detailed consensus on long-term stewardship, EM Headquarters requests Operations/Field Offices first to describe the end state and future use plans for each geographic site, second to place each geographic site into one of seven categories, and third to provide stewardship-related information for each geographic site specific to its appropriate category. Exhibit 7-1 presents the seven categories and the requested information for each.

**Exhibit 7-1. Information Requirements for Geographic Site Stewardship Categories**

No.	Stewardship Planning Category	Information Requested
1	The geographic site is completed and EM is actively funding long-term surveillance and monitoring (LTS&M) activities which are reflected in one or more PBSs.	Identify PBS(s) with LTS&M activities and describe the activities. Ensure SSL breakout of costs by category shows LTS&M costs.
2	The geographic site is completed and another (non-EM) entity is actively funding LTS&M activities, which are not reflected a PBS.	Identify the entity funding LTS&M activities.
3	The geographic site is completed and no LTS&M is required.	None.

4	The geographic site is not yet completed but EM has determined stewardship activities and costs, which are reflected in one or more PBSs.	Identify PBS(s) with LTS&M activities and describe the activities. Ensure SSL breakout of costs by category shows LTS&M costs.
5	The geographic site is not yet completed but EM has determined that stewardship activities and costs are the responsibility of another (non-EM) entity which are not reflected in a PBS.	Identify the entity funding LTS&M activities and when such activities are scheduled to begin.
6	The geographic site is not yet completed but EM has determined that stewardship activities and costs are the responsibility of another (non-EM) entity but the costs are reflected in one or more PBSs.	Identify the entity funding LTS&M activities, which PBS(s) include the activities and how much of each PBS cost is attributable to LTS&M.
7	The geographic site is not yet completed and stewardship activities are so far off and/or uncertain that the costs are not fully understood. No estimate is included in a PBS.	Estimate the annual potential costs (or range of costs) for stewardship activities starting at site completion. If such activities are not reasonably estimable, describe the required activities.