



U.S. Department of Energy  
Idaho Operations Office

# Idaho National Laboratory Site Long Term Stewardship Implementation Plan

July 2006

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## Idaho Cleanup Project

DOE/ID-11084  
Revision 1  
Project No. 23037

# **Idaho National Laboratory Site Long-Term Stewardship Implementation Plan**

**July 2006**

**Prepared for the  
U.S. Department of Energy  
DOE Idaho Operations Office**

## **ABSTRACT**

The U.S. Department of Energy has established long-term stewardship programs to protect human health and the environment at sites where residual contamination remains after site cleanup.

At the Idaho National Laboratory Site, Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) long-term stewardship activities—performed under the aegis of regulatory agreements, the *Federal Facility Agreement and Consent Order for the Idaho National Engineering Laboratory*, and state and federal requirements—are administered primarily under the direction of the Idaho Cleanup Project. It represents a subset of all ongoing environmental activity at the Idaho National Laboratory Site.

This plan provides a listing of applicable CERCLA long-term stewardship requirements and their planned and completed implementation goals. It proffers the Long-Term Stewardship Environmental Data Warehouse for Sitewide management of environmental data. This plan will be updated as needed over time, based on input from the U.S. Department of Energy, its cognizant subcontractors, and other local and regional stakeholders.



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## ACRONYMS

ARA	Auxiliary Reactor Area
AR/IR	Administrative Record and Information Repository
BEA	Battelle Energy Alliance, LLC
BORAX	Boiling Water Reactor Experiment
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFA	Central Facilities Area
CFR	<i>Code of Federal Regulations</i>
CITRC	Critical Infrastructure and Test Range Complex
DOE	U.S. Department of Energy
DOE-ID	U.S. Department of Energy Idaho Operations Office
EDW	Environmental Data Warehouse
EM	Office of Environmental Management
EPA	U.S. Environmental Protection Agency
ER	environmental restoration
ESD	explanation of significant differences
FFA/CO	Federal Facility Agreement and Consent Order
FY	fiscal year
GIS	geographical information system
HWMA	Hazardous Waste Management Act
IAG	interface agreement
IC	institutional control
ICDF	Idaho CERCLA Disposal Facility
ICP	Idaho Cleanup Project
INEEL	Idaho National Engineering and Environmental Laboratory
INEL	Idaho National Engineering Laboratory

INL	Idaho National Laboratory
INTEC	Idaho Nuclear Technology and Engineering Center
LTS	long-term stewardship
MCP	management control procedure
MFC	Materials and Fuels Complex
NRF	Naval Reactors Facility
O&M	operations and maintenance
OCVZ	organic contamination in the vadose zone
OU	operable unit
PBF	Power Burst Facility
PLN	plan
RCRA	Resource Conservation and Recovery Act
RDX	Royal Demolition Explosive
ROD	Record of Decision
RWMC	Radioactive Waste Management Complex
TAN	Test Area North
TNT	trinitrotoluene
TSCA	Toxic Substances Control Act
USC	<i>United States Code</i>
WAG	waste area group
WCF	Waste Calcining Facility

## DEFINITIONS

*CERCLA (Comprehensive Environmental Response, Compensation, and Liability Act).* Federal law that establishes a program to identify, evaluate, and remediate sites where hazardous substances might have been released (leaked, spilled, or dumped) to the environment.

*Cultural resources.* Include, but are not limited to, the following: (1) prehistoric, historic, and ethnohistoric archaeological materials (artifacts) and sites on the ground surface or buried beneath it; (2) standing structures and associated components more than 50 years old or of importance because they represent a major historical theme or era; (3) cultural and natural places, select natural resources, and sacred objects important to Native Americans and other ethnic groups; and (4) American folk life traditions and arts.

*End state.* Physical condition when cleanup actions are complete.

*Federal Facility Agreement and Consent Order (FFA/CO).* Agreement among the U.S. Department of Energy (DOE), the U.S. Environmental Protection Agency (EPA), and the State of Idaho that establishes a process and schedule to evaluate potentially contaminated sites at the Idaho National Laboratory (INL) Site, determine if remediation is warranted, and select remedy alternatives.

*Groundwater.* Water that soaks into the ground and percolates downward through rock or soil until an impermeable layer stops it. Natural sources are rainfall, snowmelt, and water that seep into the ground beneath streams, rivers, and lakes. Other sources can include irrigated fields, canals, wastewater drain fields, injection wells, leaking pipes, and industrial cooling ponds.

*Hazardous waste.* Waste regulated under the Resource Conservation and Recovery Act (RCRA) Subtitle C. A solid waste or combination of solid waste that, because of quantity, concentration, or physical or chemical characteristics, may (1) cause or significantly contribute to an increase in mortality or an increase in serious, irreversible, or incapacitating illness or (2) pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

*Institutional controls (ICs).* Generally include all nonengineered restrictions on activities or on access or exposure to land, groundwater, surface water, waste and waste disposal areas, and other areas or media. Some common examples of tools to implement institutional controls include restrictions on use or access, zoning, governmental permitting, public advisories, and installation master plans. Institutional control commitments are necessary at sites where contamination levels prevent unrestricted and unlimited use.

*Integrated long-term stewardship.* Efforts to integrate long-term stewardship activities at the INL Site have been an ongoing process. Although multiple contractors have been responsible for implementing mandated long-term stewardship activities at various sites, there has been a gradual yet consistent resolve within DOE to unify and standardize long-term stewardship efforts across the INL Site.

*Long-term stewardship.* All activities necessary to protect human health and the environment after remediation, disposal, or stabilization of a site or part of a site. The Idaho Cleanup Project expanded the scope of long-term stewardship to include conservation of ecological and cultural resources and awareness of technology changes in addition to surveillance and maintenance of remedies.

*RCRA (Resource Conservation and Recovery Act).* Federal waste management law. Its regulations govern the management (transportation, treatment, storage, and disposal) of solid waste and the generation, accumulation, recycling, and handling of hazardous waste. The RCRA waste includes material listed on one of the EPA's hazardous waste lists or material that meets one or more of the EPA's four characteristics: ignitability, corrosivity, reactivity, or toxicity.

*Remedial investigation/feasibility study.* Identifies contaminants in an area, assesses the risk they pose to human health and the environment, and evaluates remedial options.

*Remediation.* Process of cleaning up to an acceptable level of risk at a site where a hazardous or radioactive substance has been released.

*Residual contamination.* Amount of a hazardous or radioactive pollutant remaining in the environment after a natural or technological remediation process.

*Vadose zone.* Unsaturated layers of rock and soil extending from the ground surface down to the water table or aquifer. Contaminants move at different rates through the vadose zone, depending on how they react with the rock and sedimentary material.

# Idaho National Laboratory Site Long-Term Stewardship Implementation Plan

## 1. CERCLA LONG-TERM STEWARDSHIP DEFINED

Long-term stewardship (LTS) is the implementation of physical controls and operations and maintenance (O&M) activities, and the storage of data and institutional information following remediation and stabilization of some portion of a contaminated site. At the Idaho National Laboratory (INL) Site, “long-term stewardship” applies directly to the ongoing remediation of contaminated Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) sites (42 USC § 9601 et seq.). Although the term has been used indirectly to discuss any and all environmental work, its meaning within the context of this implementation document is primarily limited to the CERCLA site designation.

The CERCLA LTS at the INL Site is based on the following defining objectives:

- The protection of human health and the environment
- The conservation of ecological and cultural resources
- The verification of compliance to requirements
- The appropriate, reliable, and accurate storage and retrieval of records.

These defining objectives are fulfilled in the implementation and reporting of site surveillance; institutional controls (ICs); continued monitoring of residual contaminants; meeting the operational requirements mandated at closure; maintaining essential supporting data in a secure, reliable manner; and in remaining cognizant of relevant commitments and agreements.

## 2. RESPONSIBILITY FOR CERCLA LONG-TERM STEWARDSHIP AT THE IDAHO NATIONAL LABORATORY SITE

To manage the LTS duties across all U.S. Department of Energy (DOE) sites, DOE Headquarters established the National LTS Program to provide policy direction for individual site programs. In January 2001, DOE directed all sites where the Office of Environmental Management (EM) was landlord to submit LTS plans to DOE Headquarters. The U.S. Department of Energy Idaho Operations Office (DOE-ID) subsequently committed to write an LTS plan and prepare a programmatic budget by September 30, 2003. The stewardship plan requirement was fulfilled in the original issuance of two documents: the *INEEL Long-Term Stewardship Strategic Plan* in 2002 (DOE-ID 2002) and the previous revision of this implementation plan, *INEEL Long-Term Stewardship Implementation Plan* (DOE-ID 2003), in September 2003.

At the local level, responsibility for 546 of 671 currently identified CERCLA sites has been given to the area project manager for the Miscellaneous Sites Cleanup Project (i.e., the director over the Idaho Cleanup Project [ICP] LTS programs). With this assignment, the area project manager assumes overall responsibility for LTS at these sites, ensuring that CERCLA end-state agreements are met through specific operating and maintenance activities. However, certain aspects of the work may have been delegated to others, depending on specific agreements and contract wording relevant to each waste area group (WAG). Table 1 lists each WAG at the INL Site, its total number of currently identified sites, its responsible organization, and its performing organization.

Table 1. Responsibility for implementation of CERCLA long-term stewardship at the Idaho National Laboratory Site.

WAG	Facility	Responsible Organization	Performing Organization
1	TAN, 98 <sup>a</sup> total sites	ICP LTS Program	ICP LTS Program
2	Reactor Technology Complex, 58 <sup>a</sup> total sites	ICP LTS Program	ICP LTS Program
3	INTEC, 125 total sites	ICP LTS Program	INTEC Operations: routine O&M inspections; tank farm interim action inspections and reporting ICP LTS Program: IC inspection and reporting
4	CFA, 52 <sup>a</sup> total sites	ICP LTS Program	ICP LTS Program
5	ARA and PBF (including CITRC, ARA-IV, and the PBF reactor site) 58 <sup>a</sup> total sites	ICP LTS Program	ICP LTS Program
6	Experimental Breeder Reactor I and BORAX, 23 total sites	ICP LTS Program	ICP LTS Program
7	RWMC, 15 total sites	ICP LTS Program	ICP LTS Program: IC and O&M inspection and reporting RWMC Operations: OCVZ and Pad A inspection and reporting
8	NRF, 87 total sites	NRF Project	NRF Project
9	MFC, 38 total sites	MFC Project	ICP LTS Program: IC and O&M reporting MFC Operations: IC and O&M inspection
10	Sitewide outside of facility boundaries, 117 total sites	ICP LTS Program	ICP LTS Program

a. Totals do not include those sites that are assigned post-ROD to WAG 10 OU 10-08.

ARA = Auxiliary Reactor Area  
BORAX = Boiling Water Reactor Experiment  
CFA = Central Facilities Area  
CITRC = Critical Infrastructure and Test Range Complex  
IC = institutional control  
ICP = Idaho Cleanup Project  
INTEC = Idaho Nuclear Technology and Engineering Center  
LTS = long-term stewardship  
MFC = Materials and Fuels Complex  
NRF = Naval Reactors Facility  
O&M = operations and maintenance  
OCVZ = organic contamination in the vadose zone  
OU = operable unit  
PBF = Power Burst Facility  
ROD = Record of Decision  
RWMC = Radioactive Waste Management Complex  
TAN = Test Area North  
WAG = waste area group

For a more detailed status of specific CERCLA sites, standardized reports have been made available via the LTS Tracking System Access database on the internal website (<http://ltsweb.inel.gov>) under “Regulatory Compliance.”

Occasionally, a contaminated LTS site will fall under the purview of the Resource Conservation and Recovery Act (RCRA) (42 USC § 6901 et seq.) rather than CERCLA (42 USC § 9601 et seq.). In such an instance, as with the Waste Calcining Facility (WCF), permitted under a Hazardous Waste Management Act (HWMA) /RCRA Post-Closure Permit at the Idaho Nuclear Technology and Engineering Center (INTEC), personnel not affiliated with ICP LTS may conduct LTS activities.

This “distributed” approach to LTS responsibility and performance has provided a measure of flexibility historically required by DOE. However, it does not alleviate the requirement that data and information supporting CERCLA activities be of acceptable quality and accessible. In fact, where possible, CERCLA LTS data should be stored within the ICP Electronic Data Warehouse (EDW) Oracle database. Other sources of environmental data from around the INL Site can and probably should be accommodated within EDW, thereby providing a single, central repository under configuration management for environmental data storage.

Furthermore, at some point in the future, it is expected that DOE will require consolidation of its environmental activity, including CERCLA LTS, under a single contract. The expectation is that consolidation will require a “seamless transition” of responsibility for environmental data management and performance of LTS. Therefore, immediate and ongoing coordination between preclosure projects, LTS Program participants, and the other Sitewide environmental management organizations in the management of people, physical records, and work scope is deemed critical.

Progress toward Sitewide correlation and integration of LTS activities will be reflected in subsequent revisions of this document.

### **3. REGULATORY AGREEMENTS GOVERN CERCLA LONG-TERM STEWARDSHIP AT THE IDAHO NATIONAL LABORATORY SITE**

The LTS activities at the INL Site are governed by regulatory agreements, the *Federal Facility Agreement and Consent Order for the Idaho National Engineering Laboratory* (DOE-ID 1991), federal and state law, and DOE orders.

Regulatory agreements applicable to INL Site LTS activities normally require input from interested stakeholders, the DOE, the U.S. Environmental Protection Agency (EPA), and the State of Idaho. They are typically prescriptive in nature, calling out specific surveillance, monitoring, and management activities. Regulatory agreements may consist of any of the following:

- End-state planning documents
- CERCLA Records of Decision (RODs), Explanation of Significant Differences (ESD), or ROD amendments
- HWMA/RCRA corrective actions, closure processes, or development of postclosure permits
- Groundwater, cultural, and ecological monitoring plans; institutional controls and operations and maintenance plans; and other miscellaneous implementing procedures.

While the creation or modification of these regulatory agreements is outside the purview of the ICP LTS Program, their implementation and maintenance are not. All CERCLA public records are located within the Administrative Record and Information Repository (AR/IR), administered by ICP.

In addition to regulatory agreements, the following federal and state statutes and DOE orders are applicable to the LTS work:

- CERCLA (42 USC § 9601 et seq.)
- RCRA (42 USC § 6901 et seq.)
- Toxic Substance Control Act (TSCA) (15 USC § 2601 et seq.)
- Federal Facility Agreement and Consent Order (FFA/CO) (DOE-ID 1991)
- Close-out procedures for the National Priorities List
- DOE Policy, “Long-term Stewardship Transition to Site Landlord,” December 15, 2000
- DOE Policy, “Long-term Stewardship Responsibility,” January 19, 2001
- DOE Policy 141.1, “Department of Energy Management of Cultural Resources,” May 2, 2001
- DOE Policy 141.2, “Public Participation and Community Relations,” May 2, 2003
- DOE Policy 441.1, “DOE Radiological Health and Safety Policy,” April 26, 1996
- DOE Policy 450.4, “Safety Management System Policy,” October 15, 1996
- DOE Policy 454.1, “Use of Institutional Controls,” April 9, 2003
- DOE P 580.1, “Management Policy for Planning, Programming, Budgeting, Operation, Maintenance, and Disposal of Real Property,” May 20, 2002
- DOE Policy, “American Indian and Native Tribal Government Policy,” October 31, 2000
- DOE Order 200.1, “Information Management Program,” September 30, 1996
- DOE Order 231.1A, “Environment, Safety, and Health Reporting,” June 3, 2004
- DOE Order 430.1B, “Real Property Asset Management,” September 24, 2003.

A more detailed review of applicable statutes and orders is provided in Appendix A.

#### **4. CERCLA LONG-TERM STEWARDSHIP GOALS**

The administrative goals and strategic objectives provided within the *INEEL Long-Term Stewardship Strategic Plan* (DOE-ID 2002), which form the primary basis for LTS deliverables during the years 2005–2012, are provided in Table 2.

Table 2. General implementation goals.

<b>Goal 1:</b>	<b>Understand the full scope and implications of ICP/INL long-term stewardship responsibilities.</b>	
	Strategic Objective 1.1:	Develop an integrated approach to identify and comply with applicable laws and regulations, legal agreements, policies, orders, and ICP/INL procedures that drive the conduct of long-term stewardship activities.
	Strategic Objective 1.2:	Develop a comprehensive approach to identify and manage the contamination left in place after remediation of the INL Site.
	Strategic Objective 1.3a:	Develop an integrated approach to identify and manage the ecological resources occurring on the INL Site.
	Strategic Objective 1.3b:	Develop an integrated approach to identify and manage the cultural resources occurring on the INL Site.
<b>Goal 2:</b>	<b>Maintain acceptable levels of risk established by remedies.</b>	
	Strategic Objective 2.1:	Maintain remedies as required in plans and agreements to ensure continued protectiveness of these remedies.
	Strategic Objective 2.2:	Develop or revise procedures for implementing emergency response to failures of remedies or long-term stewardship institutional controls.
<b>Goal 3:</b>	<b>Sustain knowledge of residual contamination in a manner that retains the relevance, accessibility, and integrity of the information for stewards, decision-makers, and affected parties.</b>	
	Strategic Objective 3.1:	Develop a comprehensive system to identify and manage the data and information essential for the implementation of long-term stewardship.
	Strategic Objective 3.2:	Develop an approach to provide access to long-term stewardship information for stakeholders and members of the Shoshone-Bannock Tribes.
<b>Goal 4:</b>	<b>Support stakeholder and Shoshone-Bannock tribal understanding of and involvement in long-term stewardship.</b>	
	Strategic Objective 4.1:	Identify the appropriate levels of stakeholder and tribal involvement in ICP/INL long-term stewardship decisions and actions.
	Strategic Objective 4.2:	Maintain close relationships and communication with programs, agencies, stakeholders, and members of the Shoshone-Bannock Tribes to ensure that DOE consistently understands and considers all long-term stewardship issues and concerns.
<b>Goal 5:</b>	<b>Incorporate long-term stewardship into the ICP/INL decision-making processes.</b>	
	Strategic Objective 5.1:	Evaluate and revise, as necessary, existing ICP/INL policies and procedures to ensure consistent integration of long-term stewardship considerations in Site decisions.
	Strategic Objective 5.2:	Incorporate long-term stewardship considerations into budget and work planning guidance documents.
<b>Goal 6:</b>	<b>Sustain the ability to conduct long-term stewardship activities.</b>	
	Strategic Objective 6.1:	Identify, acquire, and manage the economic, physical, and human resources necessary to conduct long-term stewardship of the INL Site.

Table 2. (continued).

<b>Goal 7:</b>	<b>Reduce uncertainty and cost related to long-term stewardship activities.</b>	
	Strategic Objective 7.1:	Identify and implement lessons learned for continued improvement of long-term stewardship activities.
	Strategic Objective 7.2:	Identify and implement new technologies and communicate technology needs to researchers for further improvement of development.
	Strategic Objective 7.3:	Develop a process for transitioning sites out of long-term stewardship.

DOE = U.S. Department of Energy  
 ICP = Idaho Cleanup Project  
 INL = Idaho National Laboratory

## **5. GOAL IMPLEMENTATION THROUGH “ONGOING” AND “AS-NEEDED” DELIVERABLES**

When a site has been significantly remediated, responsibility for its contractually mandated O&M activities transfers to ICP LTS or its designee. All subsequent activity will be subject to the approval of DOE-ID and will be either of two types: (1) those performed on a regular, often yearly, basis and (2) those performed only “as needed.” The regular deliverables, sometimes referred to as level-of-effort deliverables, normally continue indefinitely or until a predetermined regulatory end point is reached. The LTS activities performed “as-needed” are called “implementation initiatives.” Implementation initiatives may result as finite work-scope clarification or as evolving continuous improvement efforts. They often manifest as reports or plans that do not require an annual update.

All ongoing and as-needed activities are seen as supporting at least one of the seven goal areas from the strategic plan, as follows:

1. Performing personnel seek continuous improvement in understanding LTS goals and strategic objectives, compare LTS activities against requirements, strategically plan with DOE-ID and interested agencies, implement written procedures, and follow up through agency calls and formal reports.
2. Performing personnel perform routine site maintenance activities in accordance with regulatory agreements, including environmental sampling and analysis, monitoring of ICs, operation of groundwater pump-and-treat systems, identification and processing of new CERCLA and ordnance sites, and the performance of emergency response actions.
3. Performing personnel acquire, store, maintain, and retrieve existing and newly generated LTS and Sitewide environmental data; maintain and update LTS websites; and provide data access to stakeholders, including the Shoshone-Bannock Tribes.
4. Performing personnel establish communication links with programs, agencies, and stakeholders.
5. Performing personnel collaborate with contractors Sitewide, seeking uniformity in LTS Program development and execution.
6. Performing personnel prepare LTS budgets and monitor performance.

7. Performing personnel seek LTS continuous improvement through implementation of lessons learned, attention to new technologies, and development of an approach to transition sites away from LTS.

The projected resource loadings supporting each of the above goal areas as a percentage of projected LTS budgets through 2012 are shown in Figure 1.

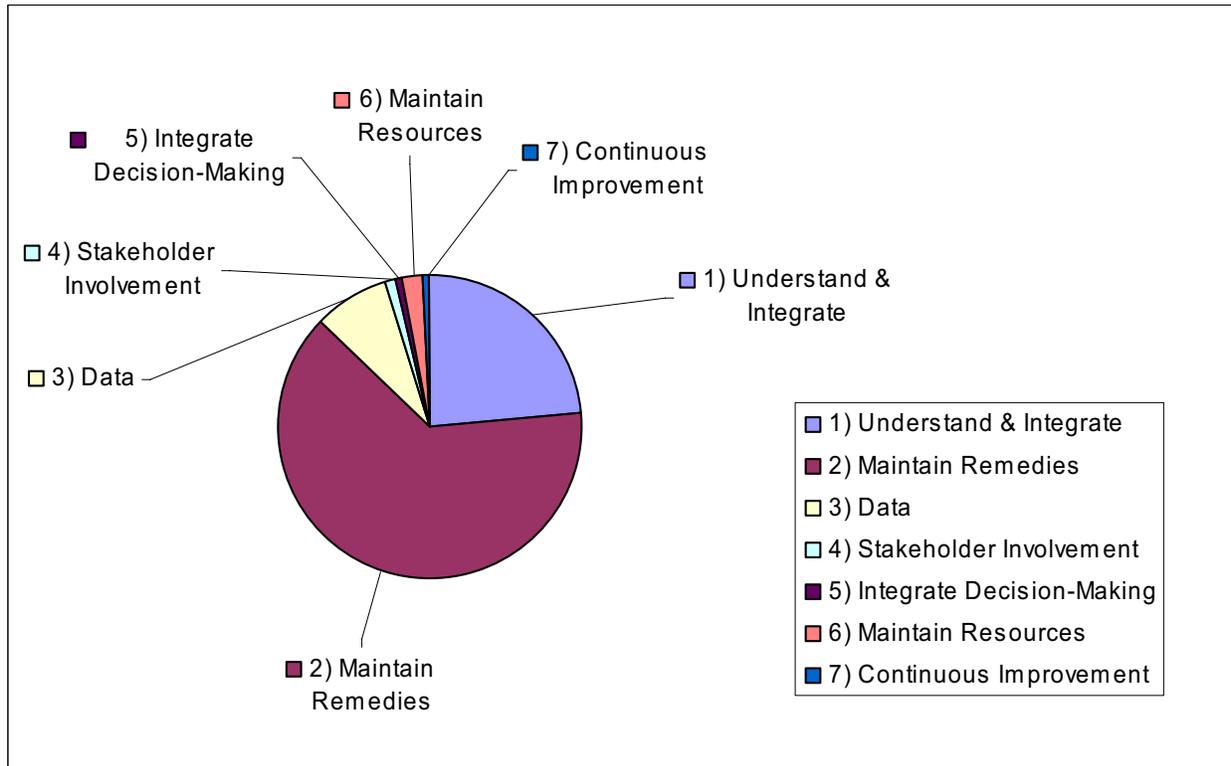


Figure 1. Long-term stewardship resource loading 2005–2012.

## 6. REPORTING OF CERCLA LONG-TERM STEWARDSHIP PROGRESS

Progress toward the fulfillment of the goals and strategic objectives outlined above can be monitored in the preparation and issuance of LTS reports. Examples of typical LTS reports include:

- O&M inspection
- IC inspection
- Groundwater monitoring
- New site identification
- 5-year review
- Information/data management
- Agency and stakeholder interface
- Ecological and cultural resource management.

## 7. FUTURE STEPS IN IDAHO NATIONAL LABORATORY LONG-TERM STEWARDSHIP PROGRAM DEVELOPMENT

This plan provides a listing of or reference to the regulatory, FFA/CO (DOE-ID 1991), state, and federal requirements applicable to CERCLA LTS at the INL Site.

In addition, it includes a status summary of LTS deliverables to date and a list of deliverables projected in the outlying years through 2012. It considers the importance of data preservation and retrieval and suggests the use of the EDW Oracle database for storage of environmental data when appropriate.

Furthermore, it confirms a consideration of stakeholder concerns in the planning and execution of LTS activities and seeks Sitewide planning cooperation in preparation for consolidation and transfer of LTS functionality from the ICP to the INL by 2012. Indeed, LTS goals and objectives should be considered as part of all current Sitewide programmatic and decision-making processes.

Finally, the ICP LTS Program stands as an ally to Sitewide LTS contractors and environmental management organizations who may be interested in working toward Sitewide consolidation.

## 8. REFERENCES

40 CFR 761.295, 2003, "Reporting and Recordkeeping of the PCB Concentrations in Samples," *Code of Federal Regulations*, Office of the Federal Register, June 2003.

15 USC § 2601 et seq., 1976, "Toxic Substances Control Act of 1976," *United States Code*, October 11, 1976.

42 USC § 300f et seq., 1974, "Safe Drinking Water Act of 1974," *United States Code*, December 16, 1974.

42 USC § 6901 et seq., 1976, "Resource Conservation and Recovery Act of 1976," *United States Code*, October 21, 1976. (The 1980 Amendment is cited as the "Solid Waste Disposal Act Amendments of 1980.")

42 USC § 9601 et seq., 1980, "Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA/Superfund)," *United States Code*, December 11, 1980.

DOE O 200.1, 1996, "Information Management Program," U.S. Department of Energy, September 30, 1996.

DOE O 231.1A, 2004, "Environment, Safety, and Health Reporting," U.S. Department of Energy, June 3, 2004.

DOE O 430.1B, 2003, "Real Property Asset Management," U.S. Department of Energy, September 24, 2003.

DOE P, 2000, "Long-term Stewardship Transition to Site Landlord," U.S. Department of Energy, December 15, 2000.

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DOE P 450.4, 1996, "Safety Management System Policy," U.S. Department of Energy, October 15, 1996.

DOE P 454.1, 2003, "Use of Institutional Controls," U.S. Department of Energy, April 9, 2003.

DOE P 580.1, 2002, "Management Policy for Planning, Programming, Budgeting, Operation, Maintenance, and Disposal of Real Property," U.S. Department of Energy, May 20, 2002.

DOE-ID, 1991, *Federal Facility Agreement and Consent Order for the Idaho National Engineering Laboratory*, Administrative Docket No. 1088-06-29-120, U.S. Department of Energy Idaho Operations Office; U.S. Environmental Protection Agency, Region 10; Idaho Department of Health and Welfare, December 4, 1991.

DOE-ID, 2002, *INEEL Long-Term Stewardship Strategic Plan*, DOE/ID-11008, Rev. 0, U.S. Department of Energy Idaho Operations Office, September 2002.

DOE-ID, 2003, *INEEL Long-Term Stewardship Implementation Plan*, DOE/ID-11084, Rev. 0, U.S. Department of Energy Idaho Operations Office, September 2003 (effective October 2003).

HWMA, 1983, "Hazardous Waste Management Act of 1983," Idaho Code § 39-4401 et seq., State of Idaho, Boise, Idaho.



## **Appendix A**

### **Requirements from High-Priority Regulations and Policies**



# Appendix A

## Requirements from High-Priority Regulations and Policies

Table A-1. Requirements from high-priority regulations and policies.

Statute, Regulations, or Policy	LTS Requirement	Comments	Implementation
CERCLA, 42 USC § 9601 et seq.	The CERCLA requirements establish federal authority to regulate and respond to hazardous substance releases and emergencies through removal and remedial actions. The CERCLA requirements provide for cleanup and LTS of inactive hazardous waste sites and require long-term surveillance and maintenance of engineered controls.	Individual WAGs will remain responsible for managing LTS activities at all CERCLA sites until responsibility for LTS is formally transferred, consistent with transfer and acceptance protocols.	RODs, IC Plan, O&M Plan, Transition Plan, RA Reports
RCRA, 42 USC § 6901 et seq.	The RCRA requirements are intended to protect human health and the environments, reduce or eliminate the generation of hazardous and nonhazardous waste, and conserve energy and natural resources. It establishes a “cradle-to-grave” system for managing waste from the point of origin to final disposal with postclosure care.	Individual projects will remain responsible for managing LTS activities at all RCRA sites until responsibility for LTS is formally transferred, consistent with transfer and acceptance protocols.	RCRA Closure Plans
TSCA, 15 USC § 2605 (a)(3) and (4)	If the administrator finds that there is a reasonable basis to conclude that the manufacture, processing, distribution in commerce, use, or disposal of a chemical substance or mixture—or that any combination of such activities—presents or will present an unreasonable risk of injury to health or the environment, the administrator shall by rule apply one or more of the following requirements to such substance or mixture to the extent necessary to protect adequately against such risk using the least burdensome requirements: (3) A requirement that such substance or mixture or any article containing such substance or mixture be marked with or accompanied by clear and adequate warnings and instructions with respect to its use, distribution in commerce, or disposal, or with respect to any combination of such activities. The administrator shall prescribe the form and content of such warnings and instructions. (4) A requirement that manufacturers and processors of such substance or mixture make and retain records of the processes used to manufacture or process such substance or mixture and monitor or conduct tests that are reasonable and necessary to ensure compliance with the requirements of any rule applicable under this subsection.	As applicable, TSCA concerns are addressed within the Waste Generator Services procedure.	Waste Generator Services

Table A-1. (continued).

Statute, Regulations, or Policy	LTS Requirement	Comments	Implementation
<p>TSCA, 40 CFR 761.295, "Reporting and Recordkeeping of the PCB Concentrations in Samples"</p>	<p>It is the policy of the United States that:</p> <p>(1) Adequate data should be developed with respect to the effect of chemical substances and mixtures on health and the environment and that the development of such data should be the responsibility of those who manufacture and those who process such chemical substances and mixtures.</p> <p>(2) Adequate authority should exist to regulate chemical substances and mixtures that present an unreasonable risk of injury to health or the environment and to take action with respect to chemical substances and mixtures that are imminent hazards.</p> <p>(3) Authority over chemical substances and mixtures should be exercised in such a manner as not to impede unduly or create unnecessary economic barriers to technological innovation while fulfilling the primary purpose of this chapter to ensure that such innovation and commerce in such chemical substances and mixtures do not present an unreasonable risk of injury to health or the environment.</p> <p>(a) Report all sample concentrations for bulk PCB remediation waste and porous surfaces on a dry weight basis and as micrograms of PCBs per gram of sample (ppm by weight).</p> <p>(b) Record and keep on file for 3 years the PCB concentration for each sample or composite sample.</p>	<p>As applicable, TSCA concerns are addressed within the Waste Generator Services procedure.</p>	<p>Waste Generator Services</p>
<p><a href="#">Safe Drinking Water Act</a>, 42 USC § 300h(b)</p>	<p>(1) Regulations under subsection (a) of this section for state underground injection programs shall contain minimum requirements for effective programs to prevent underground injection, which endangers drinking water sources within the meaning of Subsection (d)(2) of this section. Such regulations shall require that a state program, in order to be approved under Section 300h-1 of this title:</p> <p>(A) Shall prohibit, effective on the date on which the applicable underground injection control program takes effect, any underground injection in such state, which is not authorized by a permit issued by the state (except that the regulations may permit a state to authorize underground injection by rule);</p> <p>(B) Shall require:</p> <p>(i) In the case of a program which provides for authorization of underground injection by permit, that the applicant for the permit to inject must satisfy the state that the underground injection will not endanger drinking water sources, and</p> <p>(ii) In the case of a program which provides for such an authorization by rule, that no rule may be promulgated that authorizes any underground injection, which endangers drinking water sources;</p> <p>(C) Shall include inspection, monitoring, recordkeeping, and reporting requirements; and</p>	<p>The LTS activities that may be used to protect and remediate surface and groundwater include the following:</p> <ul style="list-style-type: none"> <li>- The LTS Program will comply and perform all required RCRA, CERCLA, and ROD-specified monitoring and maintenance of engineered controls and ICs</li> <li>- Groundwater monitoring</li> <li>- Land use restrictions</li> <li>- Deed restrictions</li> <li>- Visual access control (signs)</li> <li>- Physical barriers (fences, etc.)</li> <li>- Security access control at points of entry</li> </ul>	<p>INL Groundwater Monitoring Plan INL Environmental Monitoring Plan</p>

Table A-1. (continued).

Statute, Regulations, or Policy	LTS Requirement	Comments	Implementation
	<p>(D) Shall apply:</p> <p>(i) As prescribed by Section 300j-6 (b) [1] of this title, to underground injections by federal agencies, and</p> <p>(ii) To underground injections by any other person whether or not occurring on property owned or leased by the United States.</p> <p>(2) Regulations of the administrator under this section for state underground injection control programs may not prescribe requirements that interfere with or impede:</p> <p>(A) The underground injection of brine or other fluids, which are brought to the surface in connection with oil or natural gas production or natural gas storage operations, or</p> <p>(B) Any underground injection for the secondary or tertiary recovery of oil or natural gas, unless such requirements are essential to ensure that underground sources of drinking water will not be endangered by such injection.</p> <p>(3)</p> <p>(A) The regulations of the administrator under this section shall permit or provide for consideration of varying geologic, hydrological, or historical conditions in different states and in different areas within a state.</p> <p>(B)</p> <p>(i) In prescribing regulations under this section the administrator shall, to the extent feasible, avoid promulgation of requirements that would unnecessarily disrupt state underground injection control programs that are in effect and being enforced in a substantial number of states.</p> <p>(ii) For the purpose of this subparagraph, a regulation prescribed by the administrator under this section shall be deemed to disrupt a state underground injection control program only if it would be infeasible to comply with both such regulation and the state underground injection control program.</p> <p>(iii) For the purpose of this subparagraph, a regulation prescribed by the administrator under this section shall be deemed unnecessary only if, without such regulation, underground sources of drinking water will not be endangered by an underground injection.</p> <p>(C) Nothing in this section shall be construed to alter or affect the duty to ensure that underground sources of drinking water will not be endangered by any underground injection.</p>	<p>- Future accessibility for DOE to continue remediation, monitoring, and maintenance activities to complete remediation of contaminants.</p>	

Table A-1. (continued).

Statute, Regulations, or Policy	LTS Requirement	Comments	Implementation
<p><a href="#">Safe Drinking Water Act</a>, 42 USC § 300j-4(a)(1)(A)</p>	<p>Every person who is subject to any requirement of this subchapter or who is a grantee shall establish and maintain such records, make such reports, conduct such monitoring, and provide such information as the administrator may reasonably require by regulation to assist the administrator in establishing regulations under this subchapter, in determining whether such person has acted or is acting in compliance with this subchapter, in administering any program of financial assistance under this subchapter, in evaluating the health risks of unregulated contaminants, or in advising the public of such risks.</p>	<p>See 42 USC § 300h-2 for enforceable language.</p>	<p>INL Groundwater Monitoring Plan INL Environmental Monitoring Plan</p>
<p><a href="#">FFA/CO</a> (Sec. 20.2)</p>	<p>The DOE shall preserve for a minimum of 10 years after termination of this agreement all of the records in its possession or in the possession of its contractors related to sampling, analysis, investigations, and monitoring conducted in accordance with this agreement. After this 10-year period, the DOE shall notify the EPA and IDHW at least 45 days prior to destruction or disposal of any such records. Upon request, the DOE shall make such records or true copies available to the other parties.</p>	<p>As records become eligible for destruction, anything that contains information relevant to LTS will be retained and maintained in accordance with the Information Management Plan.</p>	<p>Information Management Plan MCP-557 LST-9</p>
<p><a href="#">FFA/CO</a> (Sec. 20.3)</p>	<p>The DOE agrees it shall establish and maintain an Administrative Record and index at the INEL Technical Library in Idaho Falls, Idaho, in accordance with Section 113(k) of CERCLA, 42 USC § 9613(k) and current and future EPA policy and guidance on administrative records for selection of CERCLA response actions. The DOE will provide a periodically updated Index and a copy of each document will be placed in the Administrative Record to EPA and IDHW.</p>	<p>Cleanup documentation up to and including the signing of the ROD is included in the Administrative Record. Other documents are maintained in the Information Repository.</p>	<p>This is currently being performed by the Administrative Records coordinator.</p>
<p><a href="#">FFA/CO</a> (Sec. 22.1)</p>	<p>Consistent with Section 121(c) of CERCLA, 42 USC § 9621 (c), and in accordance with this agreement, the DOE agrees that the EPA may review response action(s) for OUs that allow hazardous substances to remain onsite, no less often than every 5 years after the initiation of the final response action for such OU to ensure that human health and the environment are being protected by the response action being implemented. If upon such review it is the judgment of the EPA, after consultation with IDHW, that additional action or modification of the response action is appropriate in accordance with Sections 104, 106, and 120 of CERCLA (42 USC § 9604, 9406, and 9620), the EPA and IDHW may require the DOE to implement such additional work pursuant to Part XV.</p>	<p>—</p>	<p>5-year reviews</p>
<p><a href="#">FFA/CO</a> (Sec. 23.1)</p>	<p>Conveyance of title, easement, or other interest in the real property subject to this agreement shall be in accordance with Section 120(h) of CERCLA, 42 USC § 9620(h), and any applicable requirements of RCRA or HWMA.</p>	<p>—</p>	<p>The ICs applicable to the property are established in the RODs. The DOE is responsible for noting ICs in deeds and lease agreements.</p>

Table A-1. (continued).

Statute, Regulations, or Policy	LTS Requirement	Comments	Implementation
<p><a href="#">Close-out Procedures for NPL</a> (Sec. 4.1, Site Completion Criteria)</p>	<p>A site must meet all the criteria below to be eligible for site completion:</p> <ul style="list-style-type: none"> <li>• Cleanup goals specified in all RODs or removals are met</li> <li>• ICs are in place</li> <li>• All RA reports, on-scene coordinator reports, and pollution reports have been completed</li> <li>• All RODs, ROD amendments, and ESDs have been completed</li> <li>• The site is protective of human health and the environment</li> <li>• The only remaining activities, if any, at the site are O&amp;M activities that are performed by the state, federal facility, or responsible parties.</li> </ul>	<p>Individual WAGs will be responsible for meeting these criteria prior to transferring the site to LTS and will be responsible for managing LTS activities at the sites until responsibility for LTS is formally transferred consistent with transfer and acceptance protocols. The LTS Program will comply and perform all required RCRA, CERCLA, and ROD-specified monitoring and maintenance of engineered controls and ICs.</p>	<p>Transition Plan O&amp;M Plan</p>
<p><a href="#">Close-out Procedures for NPL</a> (Sec. 5.1, NPL Deletion Criteria, Para. 1)</p>	<p>To delete a site from the NPL, the EPA must determine, in consultation with the state, that one of the following criteria has been met:</p> <ul style="list-style-type: none"> <li>• Responsible or other parties have implemented all appropriate response actions required</li> <li>• All appropriate fund-financed response under CERCLA has been implemented, and no further response action by responsible parties is appropriate</li> <li>• The remedial investigation has shown that the release poses no significant threat to public health or the environment, and, therefore, taking of remedial measures is not appropriate.</li> </ul>	<p>—</p>	<p>Deleting the INL from the NPL will not be applicable in the near future. When it is determined that the INL meets all the requirements for deletion from the NPL, requirements in this guidance will be followed.</p>
<p><a href="#">Close-out Procedures for NPL</a> (Sec. 5.1, NPL Deletion Criteria, Para. 2)</p>	<p>At sites with ground and surface water restoration, remedies' cleanup goals must be attained before the site qualifies for deletion (see Chapter 4, Section 4.1, "Site Completion Criteria").</p>	<p>The LTS Program will continue treatment and monitoring to ensure that surface and groundwater are remediated to meet cleanup goals.</p>	<p>Groundwater Monitoring Plan INL Environmental Monitoring Plan</p>

Table A-1. (continued).

Statute, Regulations, or Policy	LTS Requirement	Comments	Implementation
<p><a href="#">Close-out Procedures for NPL</a> (Sec. 5.1 NPL Deletion Criteria, Para. 4 Textbox)</p>	<p>The NCP (40 CFR 300.435[f]) states the following: (f) Operation and maintenance. (1) Operation and maintenance (O&amp;M) measures are initiated after the remedy has achieved the remedial action objectives and remediation goals in the ROD, and is determined to be operational and functional, except for ground- or surface-water restoration actions covered under § 300.435(f)(4). A state must provide its assurance to assume responsibility for O&amp;M, including, where appropriate, requirements for maintaining institutional controls, under § 300.510(c).</p>	<p>The LTS Program will comply and perform all required RCRA, CERCLA, and ROD-specified monitoring and maintenance of engineered controls and ICs. The LTS Program will continue treatment and monitoring to ensure that surface and groundwater are remediated to meet cleanup goals.</p>	<p>ROD O&amp;M Plan Institutional Controls Plan Groundwater Monitoring Plan</p>
<p><a href="#">Close-out Procedures for NPL</a> (Sec. 5.1, NPL Deletion Criteria, Para. 6)</p>	<p>All deletion-related actions will be coordinated with the appropriate trustees listed in the Regional Contingency Plans. Upon publication in the FR of any NOID or final NOD, the region will send a copy of the notice to the trustees within 1 week of publication.</p>	<p>—</p>	<p>Deleting the INL from the NPL will not be applicable in the near future. When it is determined that the INL meets all the requirements for deletion from the NPL, requirements in this guidance will be followed.</p>
<p><a href="#">Close-out Procedures for NPL</a> (Sec. 5.3.1, Process Initiation)</p>	<p>The region initiates the deletion process by:</p> <ul style="list-style-type: none"> <li>• Obtaining a letter of concurrence from the state</li> <li>• Compiling the deletion docket</li> <li>• Preparing a NOID.</li> </ul>	<p>—</p>	<p>Deleting the INL from the NPL will not be applicable in the near future. When it is determined that the INL meets all the requirements for deletion from the NPL, requirements in this guidance will be followed.</p>
<p><a href="#">Close-out Procedures for NPL</a> (Sec. 5.3.2, State Concurrence)</p>	<p>Early in the deletion process, the region consults with the state and requests their concurrence on EPA's intent to delete the site. A site cannot be deleted from the NPL without state concurrence. If the state agrees with the deletion, they will provide a concurrence letter.</p>	<p>—</p>	<p>Deleting the INL from the NPL will not be applicable in the near future. When it is determined that the INL meets all the requirements for deletion from the NPL, requirements in this guidance will be followed.</p>
<p><a href="#">Close-out Procedures for NPL</a> (Sec. 5.3.3, Deletion Docket)</p>	<p>The region prepares a deletion docket containing all pertinent information supporting the deletion recommendation.</p>	<p>—</p>	<p>Deleting the INL from the NPL will not be applicable in the near future. When it is determined that the INL meets all the requirements for deletion from the NPL, requirements in this guidance will be followed.</p>

Table A-1. (continued).

Statute, Regulations, or Policy	LTS Requirement	Comments	Implementation
<p><a href="#">Close-out Procedures for NPL</a> (Sec. 5.3.3, Deletion Docket, Para. 3)</p>	<p>Regional program offices should work with their Superfund community involvement staff to ensure that complete copies of the deletion docket are placed in the appropriate regional and local repositories. The public will have an opportunity to review this docket during the 30-day public comment period that follows publication of the NOID.</p>	<p>—</p>	<p>Deleting the INL from the NPL will not be applicable in the near future. When it is determined that the INL meets all the requirements for deletion from the NPL, requirements in this guidance will be followed.</p>
<p><a href="#">Close-out Procedures for NPL</a> (Sec. 5.3.4, Notice of Intent to Delete)</p>	<p>The deletion docket must be complete before the region publishes the NOID in the FR.</p>	<p>—</p>	<p>Deleting the INL from the NPL will not be applicable in the near future. When it is determined that the INL meets all the requirements for deletion from the NPL, requirements in this guidance will be followed.</p>
<p><a href="#">Close-out Procedures for NPL</a> (Sec 5.3.4, Notice of Intent to Delete)</p>	<p>The NOID should contain the sections illustrated in Exhibit 5-2. Appendix D presents an example of a NOID. The draft NOID is sent to EPA Headquarters for review and comments. After addressing Headquarters comments and obtaining the signature of the regional administrator, the NOID is published in the FR.</p>	<p>—</p>	<p>Deleting the INL from the NPL will not be applicable in the near future. When it is determined that the INL meets all the requirements for deletion from the NPL, requirements in this guidance will be followed.</p>
<p><a href="#">Close-out Procedures for NPL</a> (Sec. 5.3.5, Publication of the Notice of Intent to Delete and the Local Notice)</p>	<p>The regional Superfund community involvement coordinator should also prepare and distribute a local notice regarding the NOID. This notice should be published in a local newspaper of general circulation. It should announce the Agency's intent to delete the site from the NPL and the 30-day public comment period. The local notice should also provide an address and telephone number for submission of comments and identify the location of the local repository.</p>	<p>—</p>	<p>Deleting the INL from the NPL will not be applicable in the near future. When it is determined that the INL meets all the requirements for deletion from the NPL, requirements in this guidance will be followed.</p>
<p><a href="#">Close-out Procedures for NPL</a> (Sec. 5.3.5, Publication of the Notice of Intent to Delete and the Local Notice)</p>	<p>The community involvement coordinator also should prepare a press release and distribute it to the community, state, and local officials; all PRPs; appropriate federal agencies (including the Agency for Toxic Substances and Disease Registry, the National Response Team, and the appropriate trustees listed in the Regional Contingency Plans); Superfund enforcement personnel; the Office of Regional Counsel; and any local repositories. In addition, the Office of Regional Counsel should inform the State Attorney General and other interested agencies (state or federal courts and the U.S. Department of Justice) of the intended deletion of the site.</p>	<p>—</p>	<p>Deleting the INL from the NPL will not be applicable in the near future. When it is determined that the INL meets all the requirements for deletion from the NPL, requirements in this guidance will be followed.</p>

Table A-1. (continued).

Statute, Regulations, or Policy	LTS Requirement	Comments	Implementation
<p><a href="#">Close-out Procedures for NPL</a> (Sec 5.5, Site Deletion Checklist)</p>	<p>For a site to achieve deletion, the RPM must:</p> <ul style="list-style-type: none"> <li>• Apply NCP criteria to verify deletion eligibility</li> <li>• Obtain state concurrence for site deletion</li> <li>• Compile the deletion docket</li> <li>• Distribute the deletion docket to appropriate repositories</li> <li>• Complete the NOID procedures</li> <li>• Prepare the draft</li> <li>• Submit to EPA Headquarters and the state for review and comment</li> <li>• Address Headquarters and state comments</li> <li>• Publish in the FR</li> <li>• Provide a 30-day comment period</li> <li>• Upon publication of the NOID, notify the appropriate trustees listed in the Regional Contingency Plans</li> <li>• Complete the Responsiveness Summary</li> <li>• Prepare the Responsiveness Summary</li> <li>• Submit to EPA Headquarters for review and comment</li> <li>• Obtain regional administrator approval</li> <li>• Submit to the Regional Docket and Local Repository</li> <li>• Draft the NOD</li> <li>• Publish the NOD in the FR</li> <li>• Upon publication of the NOD, notify the appropriate trustees listed in the Regional Contingency Plans.</li> </ul>	<p>—</p>	<p>Deleting the INL from the NPL will not be applicable in the near future. When it is determined that the INL meets all the requirements for deletion from the NPL, requirements in this guidance will be followed.</p>

Table A-1. (continued).

Statute, Regulations, or Policy	LTS Requirement	Comments	Implementation
<p><a href="#">Close-out Procedures for NPL</a> (Sec. 6.2.1, Mapping Requirements)</p>	<p>The mapping requirements of a partial deletion package include the following items:</p> <ul style="list-style-type: none"> <li>• A map, in electronic GIS format, clearly showing the entire site and that portion to be deleted (including scale)</li> <li>• Site coordinates (latitude and longitude) that delineate the boundary of parcel or parcels to be deleted</li> <li>• Landmarks, such as roads, water bodies, waste operations, or residential areas (these facilitate reading the map)</li> <li>• Contacts for both the partial deletion decision and the electronic data.</li> </ul>	<p>This is in reference to the map(s) used to provide information about the portion of the site to be deleted.</p>	<p>For sites meeting criteria for partial deletion, the WAG project manager will be responsible for completing and submitting appropriate documentation, including maps, for partial deletion. If the site is under LTS when it is determined that all criteria for partial deletion are met, this guidance will be followed to delete the applicable area(s) from the NPL.</p>
<p><a href="#">Close-out Procedures for NPL</a> (Sec. 6.2.1, Mapping Requirements, Para. 2)</p>	<p>The site map must be dated. The date is to reflect the delineation of the site boundaries as of the date prepared, including the portion to be deleted. Geographic coordinates of points describing a specific object (e.g., OU or portion of the site to be deleted) should be included.</p>	<p>This is in reference to the map(s) used to provide information about the portion of the site to be deleted.</p>	<p>For sites meeting criteria for partial deletion, the WAG project manager will be responsible for completing and submitting appropriate documentation, including maps, for partial deletion. If the site is under LTS when it is determined that all criteria for partial deletion are met, this guidance will be followed to delete the applicable area(s) from the NPL.</p>
<p><a href="#">Close-out Procedures for NPL</a> (Sec. 6.2.1, Mapping Requirements, Para. 2)</p>	<p>Geographic coordinates of points describing a specific object (e.g., OU or portion of the site to be deleted) should be included.</p>	<p>This is in reference to the map(s) used to provide information about the portion of the site to be deleted.</p>	<p>For sites meeting criteria for partial deletion, the WAG project manager will be responsible for completing and submitting appropriate documentation, including maps, for partial deletion. If the site is under LTS when it is determined that all criteria for partial deletion are met, this guidance will be followed to delete the applicable area(s) from the NPL.</p>

Table A-1. (continued).

Statute, Regulations, or Policy	LTS Requirement	Comments	Implementation
<p><a href="#">Close-out Procedures for NPL</a> (Sec. 6.3, Partial Deletion Checklist)</p>	<p>For a site to achieve partial deletion, the RPM must:</p> <ul style="list-style-type: none"> <li>• Provide documentation that supports the basis for deletion (Section 6.2.2)</li> <li>• Apply NCP criteria to verify deletion eligibility</li> <li>• Obtain state concurrence for partial site deletion</li> <li>• Compile the partial deletion docket</li> <li>• Distribute the partial deletion docket to the appropriate repositories</li> <li>• Complete the mapping requirements</li> <li>• Submit to the EPA Headquarters for review and comment</li> <li>• Complete NOIPD procedures</li> <li>• Prepare draft NOIPD</li> <li>• Submit to EPA Headquarters for review and comment</li> <li>• Publish in the FR</li> <li>• Provide a 30-day comment period</li> <li>• Upon publication of the NOIPD, notify the appropriate trustees listed in the Regional Contingency Plans</li> <li>• Complete the Responsiveness Summary</li> <li>• Prepare the Responsiveness Summary for submittal</li> <li>• Submit to EPA Headquarters for review and comment</li> <li>• Obtain regional administrator approval</li> <li>• Submit to the Regional Docket and Local Repository</li> <li>• Draft the Notice of NOPD</li> <li>• Publish the NOPD in the FR</li> <li>• Upon publication of the NOPD, notify the appropriate trustees listed in the Regional Contingency Plans.</li> </ul>	<p>—</p>	<p>For sites meeting criteria for partial deletion, the WAG project manager will be responsible for completing and submitting appropriate documentation for partial deletion. If the site is under LTS when it is determined that all criteria for partial deletion are met, this guidance will be followed to delete the applicable area(s) from the NPL.</p>

Table A-1. (continued).

Statute, Regulations, or Policy	LTS Requirement	Comments	Implementation
<p><a href="#">DOE Policy</a>  <a href="#">Long-Term Stewardship Transition to Site Landlord, December 15, 2000</a>                      (Para. 2)</p>	<p>To ensure a consistent and standard approach to LTS, it was determined that the policy of the department will be that the site landlord programs take responsibility for LTS activities after EM finishes its cleanup mission at a site.</p>	<p>Individual WAGs will remain responsible for managing LTS activities at all sites until responsibility for long-term stewardship is formally transferred, consistent with transfer and acceptance protocols.</p>	<p>Transition Plan                      Long-Term Stewardship Implementation Plan</p>
<p><a href="#">DOE Policy</a>  <a href="#">Long-Term Stewardship Transition to Site Landlord, December 15, 2000</a>                      (Para. 3)</p>	<p>Transfer of LTS responsibilities may occur only after the site landlord and EM agree that the EM mission at the site has been completed and the following three conditions are met: (1) a technical planning document has been developed establishing the current LTS operating baseline and describing the scope and operating costs for future LTS activities; (2) the budget authority and budget target has been transferred to the receiving PSO for the amount equivalent to the operating costs for LTS activities; and (3) a formal transfer agreement for LTS, that includes post-transfer responsibilities, has been coordinated and signed for each site.</p>	<p>Individual WAGs will remain responsible for managing LTS activities at all sites until responsibility for LTS is formally transferred, consistent with transfer and acceptance protocols.</p>	<p>Transition Plan</p>
<p><a href="#">DOE Policy</a>  <a href="#">Long-Term Stewardship Transition to Site Landlord, December 15, 2000</a>                      (Para. 3[1])</p>	<p>The receiving landlord PSO and EM will develop an LTS baseline for each site to be transferred that describes the scope of LTS program management, the baseline technical activities, and the projected schedule with expected costs. The EM will coordinate, in cooperation with the landlord PSOs, the approval of the LTS planning documents with stakeholders and regulators until the sites are formally transferred.</p>	<p>—</p>	<p>Transition Plan                      Transition Schedule</p>
<p><a href="#">DOE Policy</a>  <a href="#">Long-Term Stewardship Transition to Site Landlord, December 15, 2000</a>                      (Para. 3[1])</p>	<p>After transfer, site landlords will be responsible for updating the operating baseline with information collected as part of their ongoing LTS responsibilities.</p>	<p>—</p>	<p>O&amp;M Plan</p>

Table A-1. (continued).

Statute, Regulations, or Policy	LTS Requirement	Comments	Implementation
<p><a href="#">DOE Policy</a>  <a href="#">Long-Term Stewardship Transition to Site Landlord, December 15, 2000</a>                      (Para. 3[2])</p>	<p>EM will transfer budget authority and budget target in accordance with DOE Order 430.1, "Life Cycle Asset Management," equivalent to the level required for the LTS activities at a site. After Congressional approval of the funding transfer, the landlord PSOs will assume responsibility for managing all LTS-related activities and for programming the necessary budgets for continuing LTS activities.</p>	<p>—</p>	<p>Transition Plan                      Long-Term Stewardship Implementation Plan</p>
<p><a href="#">DOE Policy</a>  <a href="#">Long-Term Stewardship Transition to Site Landlord, December 15, 2000</a>                      (Para. 3[2])</p>	<p>As noted previously, PSOs will be responsible after transfer for maintaining the LTS baseline as required, including the update of financial planning information.</p>	<p>—</p>	<p>O&amp;M Plan</p>
<p><a href="#">DOE Policy</a>  <a href="#">Long-Term Stewardship Transition to Site Landlord, December 15, 2000</a>                      (Para. 3[2])</p>	<p>Each PSO will report to EM by the end of each fiscal year on the LTS activities at all sites for which they have responsibility.</p>	<p>—</p>	<p>The LTS Program is responsible for reporting annually on groundwater monitoring, O&amp;M activities, and ICs.</p>
<p><a href="#">DOE Policy</a>  <a href="#">Long-Term Stewardship Transition to Site Landlord, December 15, 2000</a>                      (Para. 3[3])</p>	<p>The landlord PSOs generally will assume responsibility for managing the LTS Program at those sites where EM mission activities have been completed and a non-EM mission will continue.</p>	<p>—</p>	<p>INL Institutional Plan                      FY 2002–2006                      Long-Term Stewardship Implementation Plan</p>

Table A-1. (continued).

Statute, Regulations, or Policy	LTS Requirement	Comments	Implementation
<p><a href="#">DOE Policy Long-Term Stewardship Transition to Site Landlord, December 15, 2000</a> (Para. 3[31])</p>	<p>A formal LTS MOA between EM and the receiving PSO will be executed for each site transferred. Each MOA will define the responsibilities for LTS activities and for related matters, such as performing future cleanup activities at the transferred site, should they be required.</p>	<p>The INL will work with and support DOE-ID to meet this requirement.</p>	<p>Transition Plan</p>
<p><a href="#">DOE Policy Long-Term Stewardship Transition to Site Landlord, December 15, 2000</a> (Para. 3[31])</p>	<p>For those sites where EM is requested to perform LTS activities at a site operated by the landlord PSOs, a separate, formal agreement will be executed.</p>	<p>—</p>	<p>The INL will work with and support DOE-ID to meet this requirement, as necessary.</p>
<p><a href="#">DOE Policy Long-Term stewardship Responsibility, January 19, 2001</a> (Para. 3)</p>	<p>Each EM landlord Operations and Field Office should submit to me by March 15, 2001, their proposed schedule for preparing their sites' LTS plans. I strongly recommend that you include in this schedule sufficient time to incorporate inputs from regulators, stakeholders, local officials and, where appropriate, the receiving PSO.</p>	<p>—</p>	<p>The INL Institutional Plan FY 2002–2006, the INEEL Long-Term Stewardship Strategic Plan, and the Long-Term Stewardship Implementation Plans are currently approved.</p>
<p><a href="#">DOE Policy Long-Term stewardship Responsibility, January 19, 2001</a> (Para. 4)</p>	<p>Pursuant to the S-2 Policy Memorandum, EM will prepare an annual management report on the status of the LTS Program and present the findings to the Field Management Council. EM's Office of Long-Term Stewardship (EM-51) is responsible for the preparation of this management report; the first report will be prepared by December 17, 2001.</p>	<p>—</p>	<p>The LTS Program currently prepares and submits to DOE annual reports for groundwater monitoring, ICs, and O&amp;M.</p>
<p><a href="#">DOE Policy Long-Term stewardship Responsibility, January 19, 2001</a> (Para. 5)</p>	<p>Certain issues in the transition of LTS responsibility must be addressed independently for each site. A detailed MOA will be drawn-up between EM and the receiving PSO to identify these issues and their resolution. As an example, these MOAs will address the following issues: (1) EM responsibilities in the transfer of LTS Program activities; (2) the definition of the point where EM is no longer responsible for LTS and transition will occur; (3) how activities associated with the LTS Program are paid for at sites owned by landlords; and (4) EM or landlord responsibilities if additional remedial actions are required for the site.</p>	<p>The INL will work with and support DOE-ID to meet this requirement.</p>	<p>Transition Plan</p>

Table A-1. (continued).

Statute, Regulations, or Policy	LTS Requirement	Comments	Implementation
<p><a href="#">DOE Policy 141.1</a>  <a href="#">DOE Management of Cultural Resources, May 2, 2001</a>                      (Policy, Para. 1)</p>	<p>Federal laws relating to cultural resources management require that the department identify, evaluate, and manage cultural resources under its control and jurisdiction.</p>	<p>—</p>	<p>Long-Term Stewardship Implementation Plan                      Idaho National Laboratory Cultural Resource Management Plan, DOE/ID-10997, Rev. 1</p>
<p><a href="#">DOE Policy 141.1</a>  <a href="#">DOE Management of Cultural Resources, May 2, 2001</a>                      (Policy, Para. 3)</p>	<p>The DOE will uphold these laws by preserving, protecting, and perpetuating cultural resources for future generations in a spirit of stewardship to the extent feasible given the agency's mission and mandates. To do this, DOE will implement management accountability for compliance with federal statutes, executive orders, treaties, DOE orders, and implementation guidance.</p>	<p>—</p>	<p>Long-Term Stewardship Implementation Plan                      Idaho National Laboratory Cultural Resource Management Plan, DOE/ID-10997, Rev. 1</p>
<p><a href="#">DOE Policy 141.1</a>  <a href="#">DOE Management of Cultural Resources, May 2, 2001</a>                      (Policy, Para. 4)</p>	<p>The DOE will consult with State agencies, other federal agencies, American Indian Tribes and Native Hawaiian organizations, ethnic groups or other communities and individuals, historic preservation interest groups, and additional consulting parties early in the planning process of the proposed undertaking. The DOE also will coordinate that planning with all appropriate parties as specified by the requirements of applicable statutes.</p>	<p>—</p>	<p>Long-Term Stewardship Implementation Plan                      Idaho National Laboratory Cultural Resource Management Plan, DOE/ID-10997, Rev. 1                      INEEL Long-Term Stewardship Public Involvement Plan                      Agreement-in-Principle Between the Shoshone-Bannock Tribes and the United States Department of Energy</p>
<p><a href="#">DOE Policy 141.1</a>  <a href="#">DOE Management of Cultural Resources, May 2, 2001</a>                      (Responsibilities, Item 1a)</p>	<p>Tribal consultation occurs through a formal, documented, government-to-government process that is consistent with the DOE American Indian and Alaska Native Tribal Government Policy (see DOE O 1230.2).</p>	<p>—</p>	<p>Long-Term Stewardship Implementation Plan                      INEEL Long-Term Stewardship Public Involvement Plan                      Agreement-in-Principle Between the Shoshone-Bannock Tribes and the United States Department of Energy</p>

Table A-1. (continued).

Statute, Regulations, or Policy	LTS Requirement	Comments	Implementation
<p><a href="#">DOE Policy 141.1</a>  <a href="#">DOE Management of Cultural Resources, May 2, 2001</a>                      (Responsibilities, Item 1c)</p>	<p>Responsible DOE, including NNSA, managers will develop, fully implement, and periodically review the Cultural Resources Management Plan at all DOE facilities and government-owned, contractor-operated facilities as needed. Each plan must strive to appropriately reflect local concerns. These plans should be consistent with the <i>Environmental Guidelines for Development of Cultural Resource Management Plans</i> (DOE/EH-051, August 1995). Development of these plans will be coordinated with the NEPA documentation, as appropriate.</p>	<p>The INEEL Cultural Resources Management Plan was approved in November 2004.</p>	<p>INEEL Cultural Resources Management Plan (DOE/ID-10997)</p>
<p><a href="#">DOE Policy 141.1</a>  <a href="#">DOE Management of Cultural Resources, May 2, 2001</a>                      (Responsibilities, Item 1d)</p>	<p>Responsible DOE, including NNSA, managers will develop cultural resource management strategies to implement the above plan for specific undertakings. Development of these strategies begins at the local level and incorporates the viewpoint of concerned federal, tribal, state, and local governments; historical organizations; and additional consulting parties. These strategies must be:</p> <ul style="list-style-type: none"> <li>• Documented and integrated into the department's final management decisions regarding all undertakings potentially affecting cultural resources</li> <li>• Reflected in site management contracts</li> <li>• Adhered to through appropriate management measures.</li> </ul>	<p>The INEEL Cultural Resources Management Plan was approved in November 2004.</p>	<p>INEEL Cultural Resources Management Plan (DOE/ID-10997)</p>
<p><a href="#">DOE Policy 141.1</a>  <a href="#">DOE Management of Cultural Resources, May 2, 2001</a>                      (Responsibilities, Item 1e)</p>	<p>Efforts related to compliance with cultural resources laws, regulations, and guidance will include planning and budgeting appropriate levels of effort and funding for the management of cultural resources. The LPSOs and cognizant secretarial officers will carry out these efforts for the sites or facilities for which they have landlord responsibilities. These efforts should integrate cultural resource concerns into program and project planning in a timely fashion to protect cultural resources and avoid unnecessary delays, conflicts, and costs in project implementation. These efforts should include a process for verifying compliance with all applicable requirements.</p>	<p>—</p>	<p>INEEL Cultural Resources Management Plan (DOE/ID-10997)</p>
<p><a href="#">DOE Policy 141.1</a>  <a href="#">DOE Management of Cultural Resources, May 2, 2001</a>                      (Responsibilities, Item 1f)</p>	<p>When cultural resources professionals are utilized, they will meet the qualification standards set forth in <i>Archeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines</i>. Cultural resource professionals may be useful to the department in working on cultural resource issues and ensuring compliance with federal cultural resources management laws, regulations, and guidance.</p>	<p>—</p>	<p>INEEL Cultural Resources Management Plan (DOE/ID-10997)</p>
<p><a href="#">DOE Policy 141.2</a>  <a href="#">Public Participation and Community Relations, May 2, 2003</a>                      (Goal 1)</p>	<p>The DOE will actively seek to identify stakeholders, consider public input, and incorporate or otherwise respond to the views of its stakeholders in making its decisions.</p>	<p>—</p>	<p>Long-Term Stewardship Implementation Plan                      INEEL Long-Term Stewardship Public Involvement Plan</p>

Table A-1. (continued).

Statute, Regulations, or Policy	LTS Requirement	Comments	Implementation
<p><a href="#">DOE Policy 141.2 Public Participation and Community Relations, May 2, 2003</a> (Goal 2)</p>	<p>The public will be informed in a timely manner and empowered to participate at appropriate stages in DOE's decision-making processes. Such processes will be open, understandable, and consistently followed. Managers will define clear access points for public input from the earliest stages of a decision process and will provide adequate time for stakeholders to participate.</p>	<p>—</p>	<p>Long-Term Stewardship Implementation Plan INEEL Long-Term Stewardship Public Involvement Plan</p>
<p><a href="#">DOE Policy 141.2 Public Participation and Community Relations, May 2, 2003</a> (Goal 3)</p>	<p>Credible, effective public participation processes, including active community outreach, will be consistently incorporated into DOE program operations, planning activities, and decision-making processes at DOE Headquarters and in the field. Employees within the DOE Complex will share responsibility for promoting and improving public participation and community relations.</p>	<p>—</p>	<p>Long-Term Stewardship Implementation Plan INEEL Long-Term Stewardship Public Involvement Plan</p>
<p><a href="#">DOE Policy 141.2 Public Participation and Community Relations, May 2, 2003</a> (Goal 4)</p>	<p>The DOE will conduct periodic reviews of its public participation and community relations efforts.</p>	<p>One of the performance measures identified in the Implementation Plan is to hold annual public meetings to discuss the status of the INL LTS Program and obtain input about ideas for improvement.</p>	<p>Long-Term Stewardship Implementation Plan</p>
<p><a href="#">DOE Policy 441.1 Provisions, DOE Radiological Health and Safety Policy, April 26, 1996</a> (Policy, Para. 1)</p>	<p>All departmental operations must be performed in a manner that provides reasonable assurance that workers, the public, and the environment are adequately protected.</p>	<p>This policy statement succinctly defines the department's expectation regarding DOE employees' responsibilities for safety management. The intent for LTS at the INL is to protect human health and the environment.</p>	<p>Long-Term Stewardship Implementation Plan</p>
<p><a href="#">DOE Policy 450.4 Safety Management System Policy, October 15, 1996</a> (Policy, Para. 1)</p>	<p>It is department policy that safety management systems described herein shall be used to systematically integrate safety into management and work practices at all levels so that missions are accomplished while protecting the public, the worker, and the environment.</p>	<p>Protection of the public, the workers, and the environment is maintained through provisions established in the ROD. When transferred into LTS, protection is maintained as stated in the Implementation Plan.</p>	<p>EMS Long-Term Stewardship Implementation Plan</p>

Table A-1. (continued).

Statute, Regulations, or Policy	LTS Requirement	Comments	Implementation
<p><a href="#">DOE Policy 450.4 Safety Management System Policy, October 15, 1996</a> (Component 1)</p>	<p>The department and contractors must systematically integrate safety into management and work practices at all levels so that missions are accomplished while protecting the public, the worker, and the environment. This is to be accomplished through effective integration of safety management into all facets of work planning and execution. In other words, the overall management of safety functions and activities becomes an integral part of mission accomplishment.</p>	<p>Protection of the public, the workers, and the environment is maintained through provisions established in the ROD. When transferred into LTS, protection is maintained as stated in the Implementation Plan.</p>	<p>EMS Long-Term Stewardship Implementation Plan</p>
<p><a href="#">DOE Policy 450.4 Safety Management System Policy, October 15, 1996</a> (Component 2)</p>	<p><u>Clear Roles and Responsibilities.</u> Clear and unambiguous lines of authority and responsibility for ensuring safety shall be established and maintained at all organizational levels within the department and its contractors.</p> <p><u>Competence Commensurate with Responsibilities.</u> Personnel shall possess the experience, knowledge, skills, and abilities that are necessary to discharge their responsibilities.</p> <p><u>Balanced Priorities.</u> Resources shall be effectively allocated to address safety, programmatic, and operational considerations. Protecting the public, the workers, and the environment shall be a priority whenever activities are planned and performed.</p> <p><u>Identification of Safety Standards and Requirements.</u> Before work is performed, the associated hazards shall be evaluated and an agreed-upon set of safety standards and requirements shall be established, which, if properly implemented, will provide adequate assurance that the public, the workers, and the environment are protected from adverse consequences.</p> <p><u>Hazard Controls Tailored to Work Being Performed.</u> Administrative and engineering controls to prevent and mitigate hazards shall be tailored to the work being performed and associated hazards.</p> <p><u>Operations Authorization.</u> The conditions and requirements to be satisfied for operations to be initiated and conducted shall be clearly established and agreed upon.</p>	<p>The INL has an active EMS that is designed to integrate environmental protection, pollution prevention, and continual improvement in the work planning and execution throughout all work areas to the INL as a function of the ISMS.</p>	<p>EMS Long-Term Stewardship Implementation Plan</p>

Table A-1. (continued).

Statute, Regulations, or Policy	LTS Requirement	Comments	Implementation
<p><a href="#">DOE P 454.1</a>  <a href="#">Use of Institutional Controls, April 9, 2003</a>                      (Policy, Para. 1)</p>	<p>The DOE will use a graded approach to determine what types and levels of protective measures (e.g., physical, administrative) should be used.</p>	<p>The LTS Program does not determine end states or make remedy decisions; rather, the LTS Program maintains the end states arrived at through agreement with DOE regulators. An area's end state includes all characteristics of a site following completion of remediation (e.g., type, concentration, and spatial distribution of residual contamination, surveillance and monitoring, site access restrictions and ICs, and land use as dictated by the residual contamination).</p>	<p>When required, the LTS Program will perform RCRA, CERCLA, and ROD-specified monitoring and maintenance of engineered controls and ICs.</p>
<p><a href="#">DOE P 454.1</a>  <a href="#">Use of Institutional Controls, April 9, 2003</a>                      (Policy, Para. 2)</p>	<p>The department will implement ICs, along with other mitigating or preventive measures as necessary to provide a reasonable expectation that if one control temporarily fails, other controls will be in place or actions will be taken to mitigate significant consequences of the failure.</p>	<p>The LTS Program does not determine end states or make remedy decisions; rather, the LTS Program maintains the end states arrived at through agreement with DOE regulators. An area's end state includes all characteristics of a site following completion of remediation (e.g., type, concentration, and spatial distribution of residual contamination, surveillance and monitoring, site access restrictions and ICs, and land use as dictated by the residual contamination).</p>	<p>When required, the LTS Program will perform RCRA, CERCLA, and ROD-specified monitoring and maintenance of engineered controls and ICs.</p>

Table A-1. (continued).

Statute, Regulations, or Policy	LTS Requirement	Comments	Implementation
<p><a href="#">DOE P 454.1</a>  <a href="#">Use of Institutional Controls, April 9, 2003</a>                      (Policy, Para. 2)</p>	<p>The ICs are not to be used to circumvent or substitute for permanent solutions when such solutions are reasonably achievable.</p>	<p>The LTS Program does not determine end states or make remedy decisions; rather, the LTS Program maintains the end states arrived at through agreement with DOE regulators. An area's end state includes all characteristics of a site following completion of remediation (e.g., type, concentration, and spatial distribution of residual contamination, surveillance and monitoring, site access restrictions and ICs, and land use as dictated by the residual contamination).</p>	<p>When required, the LTS Program will perform RCRA, CERCLA, and ROD-specified monitoring and maintenance of engineered controls and ICs.</p>
<p><a href="#">DOE P 454.1</a>  <a href="#">Use of Institutional Controls, April 9, 2003</a>                      (Policy, Para. 2)</p>	<p>The ICs will not be applied, or will be terminated, when DOE determines that such controls are not necessary or required.</p>	<p>The LTS Program does not determine end states or make remedy decisions; rather, the LTS Program maintains the end states arrived at through agreement with DOE regulators.</p>	<p>5-year reviews</p>
<p><a href="#">DOE P 454.1</a>  <a href="#">Use of Institutional Controls, April 9, 2003</a>                      (Implementation Goals, Para. 1)</p>	<p>The DOE will apply and implement ICs in an integrated manner to ensure that:</p> <ul style="list-style-type: none"> <li>• The purpose for controls is identified clearly, need for the controls is well established and has been considered early in planning processes consistent with integrated safety management, and both purpose and need are documented and made available to the public as appropriate and allowed by law</li> <li>• Mechanisms are in place to ensure that controls are effective, implemented as planned, properly maintained, inventoried, periodically reevaluated, and modified as necessary to reflect changes in conditions, needs, or technological advancements</li> <li>• Where multiple IC needs or goals exist at the same site, the ICs address relevant requirements or goals in an integrated, cost-effective, and protective manner</li> <li>• Actions are taken to maintain long-term site stability, minimize reliance on ICs, and keep maintenance requirements for such controls as low as practicable</li> <li>• Decisions to terminate or reduce controls (e.g., because of mitigating actions, scientific advances, natural attenuation, or changes in policy or programmatic needs) are documented and publicly available, as appropriate.</li> </ul>	<p>The LTS Program does not determine end states or make remedy decisions; rather, the LTS Program maintains the end states arrived at through agreement with DOE regulators. An area's end state includes all characteristics of a site following completion of remediation (e.g., type, concentration, and spatial distribution of residual contamination, surveillance and monitoring, site access restrictions and ICs, and land use as dictated by the residual contamination).</p>	<p>INEEL Site-wide Institutional Controls Plan</p> <p>Results from routine periodic IC assessments and 5-year reviews are documented and maintained in the ICP Stewardship project files.</p>

Table A-1. (continued).

Statute, Regulations, or Policy	LTS Requirement	Comments	Implementation
<p><a href="#">DOE P 454.1</a>  <a href="#">Use of Institutional Controls, April 9, 2003</a>                      (Implementation Goals, Para. 2)</p>	<p>The DOE will maintain the ICs as long as necessary to perform their intended protective purposes and seek sufficient funds.</p>	<p>The LTS Program will comply and perform all required RCRA, CERCLA, and ROD-specified monitoring and maintenance of engineered controls and ICs.</p>	<p>INEEL Long-Term Stewardship Implementation Plan                      INEEL Site-wide Institutional Controls Plan                      Routine periodic IC assessments and 5-year reviews</p>
<p><a href="#">DOE P 454.1</a>  <a href="#">Use of Institutional Controls, April 9, 2003</a>                      (Property Issues, Para. 2)</p>	<p>Before DOE authorizes transfer of property, there will be a reasonable expectation that:</p> <ul style="list-style-type: none"> <li>• All necessary ICs can be maintained after the transfer</li> <li>• The new owner (whether a DOE or non-DOE entity) understands and is capable of meeting its IC responsibilities.</li> </ul>	<p>Based on previous CERCLA risk assessments and remedial action objectives for the INL, it is anticipated that land within the INL will remain in government control for at least 100 years. After that timeframe, any transfer of land will be controlled by the requirements imposed on government land transfers and the FFA/CO. Consequently, controls on property lease or transfers and land owner limitations are not likely to be of concern until land is released from government control.</p>	<p>The ICs or other limitations that are applicable to a piece of property should be noted in the deed or lease agreement. It is DOE's responsibility to ensure that ICs that are in place at the time of transfer are adhered to.</p>
<p><a href="#">DOE P 454.1</a>  <a href="#">Use of Institutional Controls, April 9, 2003</a>                      (Property Issues, Para. 3)</p>	<p>The DOE will determine whether responsibility for required ICs on transferred property can be maintained by subsequent owners consistent with applicable law. If this implementation responsibility cannot be reliably assured, then DOE will retain necessary responsibility and authority for the ICs, including continued ownership of the property if necessary.</p>	<p>Based on previous CERCLA risk assessments and remedial action objectives for the INL, it is anticipated that land within the INL will remain in government control for at least 100 years. After that timeframe, any transfer of land will be controlled by the requirements imposed on government land transfers and the FFA/CO. Consequently, controls on property lease or transfers and land owner limitations are not likely to be of concern until land is released from government control.</p>	<p>The ICs or other limitations that are applicable to a piece of property should be noted in the deed or lease agreement. It is DOE's responsibility to ensure that ICs that are in place at the time of transfer are adhered to.</p>

Table A-1. (continued).

Statute, Regulations, or Policy	LTS Requirement	Comments	Implementation
<p><a href="#">DOE P 454.1</a>  <a href="#">Use of Institutional Controls, April 9, 2003</a> (Property Issues, Para. 3)</p>	<p>The respective responsibilities of DOE and the new owner for any required ICs will be documented and communicated to all directly involved parties at the time of transfer.</p>	<p>Based on previous CERCLA risk assessments and remedial action objectives for the INL, it is anticipated that land within the INL will remain in government control for at least 100 years. After that timeframe, any transfer of land will be controlled by the requirements imposed on government land transfers and the FFA/CO. Consequently, controls on property lease or transfers and land owner limitations are not likely to be of concern until land is released from government control.</p>	<p>The ICs or other limitations that are applicable to a piece of property should be noted in the deed or lease agreement. It is DOE's responsibility to ensure that ICs that are in place at the time of transfer are adhered to.</p>
<p><a href="#">DOE P 580.1</a>  <a href="#">Management Policy for Planning, Programming, Budgeting, Operation, Maintenance and Disposal of Real Property, May 20, 2002</a> (Policy, Para. 3)</p>	<p>To accomplish the objective, the department will establish standards, processes, and reporting mechanisms that will:</p> <ul style="list-style-type: none"> <li>• Ensure validated data are available in the FIMS, DOE's corporate real property database, to support informed decision making throughout the PP&amp;E process</li> <li>• Establish demonstrable, consistent, and measurable facility planning processes that prioritize capital, maintenance, and other facility requirements based upon mission need, age, and condition of the physical plant</li> <li>• Optimize capacity and use of existing facilities</li> <li>• Manage the disposition of excess facilities</li> <li>• Identify realistic and supportable budgets to provide resources (dollars and personnel) necessary to sustain the physical plant and support recapitalization efforts</li> <li>• Ensure that the budget formulation policy and the accounting handbook are consistent with good maintenance management business practices</li> <li>• Support management decisions by assessing facilities' planning and performance management effectiveness as measured through FIMS and other relevant information.</li> </ul> <p>The department recognizes that some tribes have treaty-protected and other federally recognized rights to resources and resource interests located within reservation boundaries, aboriginal territories, and outside reservation and jurisdictional boundaries, and will, to the extent of its authority, protect and promote these treaty and trust resources and resource interests, and related concerns in these areas.</p>	<p>The major DOE objective is to establish a holistic PP&amp;E process that links real property assets, and the resources dedicated to them, to mission requirements and performance.</p>	<p>The INL will work with DOE to ensure that management and disposal of real property is conducted correctly. For CERCLA sites, the CFLUP is updated annually to reflect land use and management information.</p>
<p><a href="#">DOE Policy</a>  <a href="#">American Indian and Native Tribal Government Policy, October 31, 2000</a></p>	<p>—</p>	<p>—</p>	<p>Idaho National Laboratory Cultural Resource Management Plan, DOE/ID-10997, Rev 1</p>

Table A-1. (continued).

Statute, Regulations, or Policy	LTS Requirement	Comments	Implementation
<a href="#">DOE Policy</a> <a href="#">American Indian and Native Tribal Government Policy, October 31, 2000</a>	<p>The DOE will establish protocols for communication between tribal leaders, the secretary, and federal officials.</p>	<p>—</p>	<p>Idaho National Laboratory Cultural Resource Management Plan, DOE/ID-10997, Rev. 1</p>
<a href="#">DOE Policy</a> <a href="#">American Indian and Native Tribal Government Policy, October 31, 2000</a>	<p>To ensure protection and exercise of tribal treaty and other federally recognized rights, the DOE will implement a proactive outreach effort of notice and consultation regarding current and proposed actions affecting tribes, including appropriate fiscal year budget matters. This effort will include timely notice to all potentially impacted Indian nations in the early planning stages of the decision-making process, including predraft consultation, in the development of regulatory policies on matters that significantly or uniquely affect their communities.</p>	<p>—</p>	<p>Idaho National Laboratory Cultural Resource Management Plan, DOE/ID-10997, Rev. 1</p>
<a href="#">DOE Policy</a> <a href="#">American Indian and Native Tribal Government Policy, October 31, 2000</a>	<p>The DOE will continue to conduct a dialogue with Indian nations for long- and short-term decision making when DOE action impacts Indian nations.</p>	<p>—</p>	<p>Idaho National Laboratory Cultural Resource Management Plan, DOE/ID-10997, Rev. 1</p>
<a href="#">DOE Policy</a> <a href="#">American Indian and Native Tribal Government Policy, October 31, 2000</a>	<p>The department will consult with any American Indian or Alaska Native tribal government with regard to any property to which that tribe attaches religious or cultural importance that might be affected by a DOE action.</p>	<p>—</p>	<p>Idaho National Laboratory Cultural Resource Management Plan, DOE/ID-10997, Rev. 1</p>
<a href="#">DOE Policy</a> <a href="#">American Indian and Native Tribal Government Policy, October 31, 2000</a>	<p>Departmental consultation will include the prompt exchange of information regarding identification, evaluation, and protection of cultural resources. To the extent allowed by law, consultation will defer to tribal policies on confidentiality and management of cultural resources. Consultation will include matters regarding location and management methodology; repatriation and other disposition of objects and human remains; access to sacred areas and traditional resources located on DOE lands, consistent with safety and national security consideration; and cultural resources impact assessment of potential loss to tribal communities.</p>	<p>—</p>	<p>Idaho National Laboratory Cultural Resource Management Plan, DOE/ID-10997, Rev. 1</p>

Table A-1. (continued).

Statute, Regulations, or Policy	LTS Requirement	Comments	Implementation
<p><a href="#">DOE Order 200.1 Information Management Program, September 30, 1996</a> (CRD 1)</p>	<p>Manage information management activities in accordance with applicable laws, regulation, and departmental policy and manuals as identified in their contract, including any additional explicit departmental information management requirements transmitted by the responsible contracting officer.</p>	<p>—</p>	<p>MCP-557 INEEL Long-Term Information Management Plan</p>
<p><a href="#">DOE Order 200.1 Information Management Program, September 30, 1996</a> (CRD 2)</p>	<p>Employ sound business practices for information management to achieve performance objectives identified in their contract.</p>	<p>—</p>	<p>INEEL Long-Term Information Management Plan</p>
<p><a href="#">DOE Order 200.1 Information Management Program, September 30, 1996</a> (CRD 3)</p>	<p>Conduct funded programmatic information management activities in accordance with the work scope (including any specific mission-oriented performance measures) agreed to with Program Offices or customers.</p>	<p>—</p>	<p>INEEL Long-Term Information Management Plan</p>
<p><a href="#">DOE Order 231.1A Environment, Safety and Health Reporting, August 19, 2003</a> (Sec. 4, Requirements, Para. 1)</p>	<p>Unless otherwise indicated, the reports listed below will be submitted in accordance with the most recent versions of DOE M 231.1-1 and DOE M 231.1-2:</p> <ul style="list-style-type: none"> <li>• Occupational injury and illness reports</li> <li>• Fatality and catastrophe reports</li> <li>• Work hours reports</li> <li>• Occupational radiation exposure data to individuals (and visitors)</li> <li>• Annual individual occupational radiation exposure data to the Radiation Exposure Monitoring System</li> <li>• NEPA reporting</li> <li>• Annual Site Environmental Reports</li> <li>• Excess injury and illness reports</li> <li>• Information requested by external organizations for epidemiological studies</li> <li>• Annual fire protection summaries</li> <li>• Occurrence reports</li> <li>• Environmental Protection Program reports</li> </ul>	<p>—</p>	<p>The LTS Program is responsible for providing an annual institutional controls report, an annual O&amp;M report, an annual groundwater monitoring report, and 5-year review reports to DOE.</p>

Table A-1. (continued).

Statute, Regulations, or Policy	LTS Requirement	Comments	Implementation
<p><a href="#">DOE Order 430.1B</a>  <a href="#">Real Property Asset Management, September 24, 2003</a>                      (CRD 4)</p>	<p>The contractor must:</p> <ol style="list-style-type: none"> <li>Submit all real estate actions to acquire, utilize, and dispose of real property assets to DOE for review and approval</li> <li>Maintain, in a complete and current condition, all real estate records identified by DOE</li> <li>Have a land-use planning and management process approved by the site LPSO.</li> </ol>	<p>—</p>	<p>For CERCLA sites, land-use planning and management information is updated annually in the CFLUP. There is a comprehensive plan that is currently drafted but not yet approved.</p>
<p><a href="#">DOE Order 430.1B</a>  <a href="#">Real Property Asset Management, September 24, 2003</a>                      (CRD 5)</p>	<p>The contractor must maintain real property assets in a manner that promotes operational safety, worker health, environmental compliance, property preservation, and cost-effectiveness while meeting the program missions. This requires a balanced approach that not only sustains the assets, but also provides for their recapitalization and includes the following as a minimum:</p> <ol style="list-style-type: none"> <li>A maintenance management program that includes a condition assessment of the real property assets, a work control system, management of deferred maintenance, a method to prioritize, and systems to budget and track maintenance expenditures.</li> <li>Identification of 5-year maintenance and repair requirements (sustainment) and funding for deferred maintenance reduction.</li> <li>Identification of 5-year recapitalization requirements to replace or modernize existing facilities.</li> <li>Condition assessments must be performed on real property assets at least once within a 5-year period and may be required more frequently for mission-essential facilities and infrastructure. The condition assessment program shall utilize a tailored approach based on facility status, mission and importance, and the magnitude of the hazards associated with facilities and infrastructure. Inspection methodology shall be consistent with industry practice and shall include identification of safety and health hazards. Deferred maintenance estimates will be based on nationally recognized cost estimating systems or the DOE Condition Assessment Information System. The condition assessment program will support the reporting requirements of FIMS.</li> </ol>	<p>—</p>	<p>O&amp;M Plan</p>
<p><a href="#">DOE Order 430.1B</a>  <a href="#">Real Property Asset Management, September 24, 2003</a>                      (CRD 6)</p>	<p>When DOE identifies that a program mission is no longer required, the contractor must initiate preparation of affected real property assets for disposition, including potential reuse for other missions.</p>	<p>—</p>	<p>—</p>

Table A-1. (continued).

Statute, Regulations, or Policy	LTS Requirement	Comments	Implementation
<p><a href="#">DOE Order 430.1B</a>  <a href="#">Real Property Asset Management</a>,  <a href="#">September 24, 2003</a>                      (CRD 6a)</p>	<p>Identify real property assets that are likely to be declared as excess in a 10-year planning horizon and the anticipated year of excess. This information must be included in FIMS and incorporated within the TYSP.</p> <p>Develop a disposition baseline to assess and prepare the facility for disposition. Technical, programmatic, and regulatory information is to be used in the disposition preparation and planning process. The disposition baseline must include the following information:</p> <p>(1) Identification and characterization of hazardous and radioactive materials, waste, and hazardous conditions of the real property asset</p> <p>(2) Surveillance and maintenance requirements needed to ensure that the real property asset, including its systems, and stored hazardous materials and waste remain in a stable and known condition and that adequate protection is provided to the workers, the public, and the environment pending disposition</p> <p>(3) Assessment and adjustment of the facility authorization basis, as necessary, to reflect conditions and activities pending disposition.</p>	<p>This item is part of a list identifying actions that the contractor must take to prepare for disposition of real assets.</p> <p>This item is part of a list identifying actions that the contractor must take to prepare for disposition of real assets.</p>	<p>For CERCLA sites, this information is updated annually in the CFLUP.                      TYSP</p> <p>(1) MCP-3448 provides a way to assess hazardous sites that have not been previously identified.                      (2) O&amp;M Plan                      Institutional Controls Plan</p>
<p><a href="#">DOE Order 430.1B</a>  <a href="#">Real Property Asset Management</a>,  <a href="#">September 24, 2003</a>                      (CRD 6b)</p>	<p>Develop a disposition plan that identifies, assesses, and evaluates alternatives and integrates environmental, safety, and health requirements into disposition activities. The disposition plan should be tailored based on the disposition baseline and disposal method to be used (e.g., reuse, demolition, or decommissioning). The disposition plan shall include the following:</p> <p>(1) A method for identifying, evaluating, and selecting disposition alternatives and LTS requirements. Selection of the preferred disposition alternative needs to be documented and be in accordance with relevant industry standards. Stakeholder involvement is required in the development of LTS plans.</p> <p>(2) The identification and completion of required activities related to historical preservation.</p> <p>(3) A postclosure/postdisposition/LTS records turnover or retention plan.</p> <p>(4) Surveillance and maintenance plans for facilities and land parcels with residual contamination, hazards, or other conditions that are projected to require postdisposition LTS. These plans must identify appropriate management and funding requirements to ensure safety, health, and environmental regulatory compliance and meet relevant requirements of treaties, agreements, or other DOE commitments.</p>	<p>This item is part of a list identifying actions that the contractor must take to prepare for disposition of real assets.</p>	<p>(1) ROD                      (2) Currently being performed by BEA organization B220                      (3) Transition Plan                      (4) O&amp;M Plan</p>

Table A-1. (continued).

Statute, Regulations, or Policy	LTS Requirement	Comments	Implementation
	<p>(5) A process to track the status of LTS actions, including gap analysis of the LTS transition framework to identify actions remaining before end-point conditions are satisfied. This should include a method to periodically reassess monitoring requirements and make any necessary revisions.</p> <p>(6) The cost and schedule information for disposition activities and any follow-on surveillance and maintenance and LTS requirements must be included in the TYSP.</p> <p>(7) The development of specific end-point criteria for declaring disposition complete.</p> <p>(8) The use of non-time-critical removal actions under CERCLA, using a tailored process negotiated with the EPA, with continued Defense Nuclear Facilities Safety Board oversight to the extent authorized by law.</p>	<p>(5) The CFLUP tracks status changes in IC sites. Other aspects of LTS are being tracked by several mechanisms in LTS.</p> <p>(6) Schedule for disposition activities has been developed and is being validated.</p> <p>(7) RA Report</p> <p>(8) Maintained as part of the historical record.</p>	<p>(5) The CFLUP tracks status changes in IC sites. Other aspects of LTS are being tracked by several mechanisms in LTS.</p> <p>(6) Schedule for disposition activities has been developed and is being validated.</p> <p>(7) RA Report</p> <p>(8) Maintained as part of the historical record.</p>
<p><a href="#">DOE Order 430.1B</a> <a href="#">Real Property Asset Management, September 24, 2003</a> (CRD 6d)</p>	<p>Summarize disposition cost and schedule information and end-point criteria in a 10-year planning horizon.</p>	<p>This item is part of a list identifying actions that the contractor must take to prepare for disposition of real assets.</p>	<p>This is of interest to LTS only if after DD&amp;D the site is still not “clean,” in which case MCP-3348 would apply.</p>
<p><a href="#">DOE Order 430.1B</a> <a href="#">Real Property Asset Management, September 24, 2003</a> (CRD 6f)</p>	<p>Develop a final report or equivalent document for each disposition and land parcel remediation/LTS project that describes, at a minimum, final facility status and includes information demonstrating that end-point criteria have been met.</p>	<p>This item is part of a list identifying actions that the contractor must take to prepare for disposition of real assets.</p>	<p>RA Report</p>
<p><a href="#">DOE Order 450.1</a> <a href="#">Environment, Safety and Health Policy for the Department of Energy Complex, June 15, 1995</a> (CRD Item 2b)</p>	<p>Promote the LTS of a site’s natural and cultural resources throughout its operational, closure, and postclosure life cycle.</p>	<p>Individual WAGs will remain responsible for managing LTS activities at all sites until responsibility for LTS is formally transferred, consistent with transfer and acceptance protocols.</p>	<p>Long-Term Stewardship Implementation Plan</p> <p>INEEL Institutional Plan FY 2002–2006</p>
<p><a href="#">DOE Order 450.1</a> <a href="#">Environment, Safety and Health Policy for the Department of Energy Complex, June 15, 1995</a> (CRD Item 2d)</p>	<p>Ensure the early identification of, and appropriate response to, potential adverse environmental impacts associated with DOE operations, including (as appropriate) preoperational characterization and assessment, and effluent and surveillance monitoring.</p>	<p>Individual WAGs will remain responsible for managing LTS activities at all sites until responsibility for LTS is formally transferred consistent with transfer and acceptance protocols.</p>	<p>Long-Term Stewardship Implementation Plan</p> <p>INEEL Environmental Monitoring Plan</p> <p>INEEL Groundwater Monitoring Plan</p>

Table A-1. (continued).

Statute, Regulations, or Policy	LTS Requirement	Comments	Implementation
<p><a href="#">DOE Order 450.1 Environment, Safety and Health Policy for the Department of Energy Complex, June 15, 1995</a> (CRD Item 10)</p>	<p>Conduct environmental monitoring, as appropriate, to support the site's ISMS; to detect, characterize, and respond to releases from DOE activities; assess impacts; estimate dispersal patterns in the environment; characterize the pathways of exposure to members of the public; characterize the exposures and doses to individuals and to the population; and to evaluate the potential impacts to the biota in the vicinity of the DOE activity.</p>	<p>Individual WAGs will remain responsible for managing LTS activities at all sites until responsibility for LTS is formally transferred consistent with transfer and acceptance protocols.</p>	<p>Long-Term Stewardship Implementation Plan INEEL Environmental Monitoring Plan INEEL Groundwater Monitoring Plan</p>
<p><a href="#">DOE Order 450.1 Environment, Safety and Health Policy for the Department of Energy Complex, June 15, 1995</a> (CRD Item 11)</p>	<p>Ensure the analytical work supporting environmental monitoring is implemented using: (a) A consistent system for collecting, assessing, and documenting environmental data of known and documented quality; (b) A validated and consistent approach for sampling and analysis of radionuclide samples to ensure that laboratory data meet program-specific needs and requirements within the framework of a performance-based approach for analytical laboratory work (c) An integrated sampling approach to avoid duplicative data collection.</p>	<p>Individual WAGs will remain responsible for managing LTS activities at all sites until responsibility for LTS is formally transferred consistent with transfer and acceptance protocols.</p>	<p>Long-Term Stewardship Implementation Plan INEEL Groundwater Monitoring Plan INEEL Environmental Monitoring Plan</p>
<p>IDAPA 58.01.011, Ground Water Quality Rule</p>	<p>The waste-handling activities must prevent migration of contaminants from the reactor complex that would cause the SRPA groundwater to exceed applicable State of Idaho groundwater quality standards in 2095 and beyond.</p>	<p>State of Idaho groundwater concerns.</p>	<p>RODs and implementing procedures</p>
<p>CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act            CFLUP = Comprehensive Facility and Land Use Plan            CFR = Code of Federal Regulations            DOE = U.S. Department of Energy            DOE-ID = U.S. Department of Energy Idaho Operations Office            EM = Office of Environmental Management            EMS = environmental monitoring system            EPA = U.S. Environmental Protection Agency            ESD = Explanation of Significant Differences            FFA/CO = Federal Facility Agreement and Consent Order            FIMS = Facility Information Management System            FR = Federal Register            FY = fiscal year            GIS = geographical information system            HWMA = Hazardous Waste Management Act            IC = institutional control            IDAPA = Idaho Administrative Procedures Act            IDHW = Idaho Department of Health and Welfare            INEEL = Idaho National Engineering and Environmental Laboratory            INEL = Idaho National Engineering Laboratory            INL = Idaho National Laboratory            ISMS = Integrated Safety Management System            LPSO = Lead Program Secretariat Office            LST = list LTS = long-term stewardship            MCP = management control procedure            MOA = Memorandum of Agreement            NCP = National Contingency Plan            NEPA = National Environmental Policy Act            NOD = Notice of Deficiency            NOID = Notice of Intent to Delete            NPL = National Priorities List            O&amp;M = operations and maintenance            OU = operable unit            PCB = polychlorinated biphenyl            PPB&amp;E = Planning, Programming, Budgeting, and Execution            PRD = potentially responsible party            PSO = Program Secretariat Office            RA = remedial action            RCRA = Resource Conservation and Recovery Act            ROD = Record of Decision            RPM = remedial project manager            TSCA = Toxic Substances Control Act            USC = United States Code            WAG = waste area group</p>			



## **Appendix B**

### **Status of Long-Term Stewardship Strategic Plan Goals and Strategic Objectives**



## Appendix B

### Status of Long-Term Stewardship Strategic Plan Goals and Strategic Objectives

#### B-1. STATUS OF LONG-TERM STEWARDSHIP STRATEGIC PLAN GOALS AND STRATEGIC OBJECTIVES

This section covers all reported milestones—completed or planned—with description, whether accomplished by the Idaho Cleanup Project (ICP) Long-Term Stewardship (LTS) group or other contractors.

##### B-1.1 Goal 1: Understand the Full Scope and Implications of the Idaho National Laboratory/Idaho Cleanup Project’s Long-Term Stewardship Responsibilities

This section addresses the three strategic objectives of Goal 1.

###### B-1.1.1 Strategic Objective 1.1

This objective is to develop an integrated approach to identify and comply with applicable laws and regulations, legal agreements, policies, orders, and Idaho Cleanup Project (ICP)/Idaho National Laboratory (INL) procedures that drive the conduct of long-term stewardship (LTS) activities. Table B-1 lists completed and planned milestones for this objective.

Table B-1. Completed and planned milestones for Strategic Objective 1.1.

Initial Date	Planned Date	Document/Reference	Description
September 2002	—	DOE/ID-11008, <i>INEEL Long-Term Stewardship Strategic Plan</i>	Strategic planning
September 2003	FY 2006	DOE/ID-11084, <i>INEEL Long-Term Stewardship Implementation Plan</i>	Implementation planning and requirements listings: draft a regulatory and legal agreements plan; survey the requirement sources; extract requirement statements; identify the method of compliance (gap analysis); validate the applicability of requirements; verify compliance methods; and institutionalize requirements.
September 2005	2007	PLN-2058, “Transitioning ICP Projects from Remediation to Stewardship”	Draft a transition plan and update as needed (update with schedule).

FY = fiscal year  
 ICP = Idaho Cleanup Project  
 INEEL = Idaho National Engineering and Environmental Laboratory  
 PLN = plan

### B-1.1.2 Strategic Objective 1.2

This objective is to develop a comprehensive approach to identify and manage the contamination left in place after remediation of the INL Site. Table B-2 lists completed and planned milestones for this objective.

### B-1.1.3 Strategic Objective 1.3

This objective is to develop an integrated approach to identify and manage the ecological and cultural resources occurring on the INL Site. Table B-3 lists completed and planned ecological milestones for this objective. Table B-4 lists completed and planned cultural resource milestones for this objective.

Table B-2. Completed and planned milestones for Strategic Objective 1.2.

Initial Date	Planned Date	Document/Reference	Description
June 1995	—	INEL-95/0190, <i>Guidance Manual for Conducting Screening Level Ecological Risk Assessments at the INEL</i> (Ecolit appendix)	Ecological monitoring planning
July 2000	—	INEEL/EXT-2000-00917, <i>Institutional Control Plan for the Test Area North Waste Area Group 1</i>	TAN IC planning (inactivated when incorporated into Sitewide IC plan)
November 2001	—	INEEL/EXT-01-01410, <i>Long-Term Stewardship Baseline Report and Transition Guidance</i>	LTS to lead transition planning
August 2002	—	DOE/ID-10902, <i>Waste Area Group 10, Operable Unit 10-08, Remedial Investigation/Feasibility Study Work Plan (FINAL)</i>	WAG 10, OU 10-08 planning
January 2003	—	DOE/ID-10729, <i>Institutional Control Plan for the Idaho Nuclear Technology and Engineering Center, Waste Area Group 3, Operable Unit 3-13</i>	INTEC IC planning
June 2003	—	DOE/ID-11066, <i>Monitored Natural Attenuation Operations, Monitoring, and Maintenance Plan for Test Area North, Operable Unit 1-07B</i>	TAN groundwater work planning
July 2003	—	PLN-678, "Phase II Operations and Maintenance Plan for the OU 7-10 Glovebox Excavator Method Project"	RWMC glovebox excavator retrieval O&M planning
September 2003	—	DOE/ID-10684, <i>New Pump and Treat Facility Operations and Maintenance Plan for Test Area North Final Groundwater Remediation, Operable Unit 1-07B</i>	TAN groundwater work planning

Table B-2. (continued).

Initial Date	Planned Date	Document/Reference	Description
October 2003	—	IAG-143, "Interface Agreement between Closure Projects at the INEEL and Surveillance, Monitoring and Long-Term Operations Groundwater Monitoring Sampling Project"	Sitewide groundwater monitoring agreement
February 2004	—	DOE/ID-11102, <i>Operations and Maintenance Plan for Operable Units 6-05 and 10-04, Phase I</i>	Experimental Breeder Reactor I/Boiling Water Reactor O&M planning
April 2004	—	DOE/ID-11088, <i>Idaho National Engineering and Environmental Laboratory Environmental Monitoring Plan</i>	Environmental monitoring planning
April 2004	—	DOE/ID-10931, <i>Operations and Maintenance Plan for the Final Selected Remedies at Central Facilities Area, Operable Unit 4-13</i>	CFA landfills and sewage drainfield postremedial O&M planning
June 2004	FY 2006	DOE/ID-11042, <i>INEEL Sitewide Institutional Controls Plan</i>	IC planning
July 2004	—	DOE/ID-11012, <i>In Situ Bioremediation Operations and Maintenance Plan for Test Area North, Operable Unit 1-07B</i>	TAN remedial action O&M planning
August 2004	—	INEEL/EXT-04-00016, <i>Operations and Maintenance Plan for the OU 7-08 Organic Contamination in the Vazose Zone Project</i>	RWMC work planning
August 2004	—	DOE/NE-ID-11130, <i>Operations and Maintenance Plan for Operable Units 6-05 and 10-04, Phase II</i>	RDX- and TNT-contaminated sites O&M planning
September 2004	—	DOE/NE-ID-11159, <i>INEEL Sitewide Operations and Maintenance Plan for CERCLA Response Actions</i>	O&M planning
September 2004	—	DOE/ID-10779, <i>Groundwater Monitoring Plan for the Waste Area Group 5 Remedial Action</i>	CITRC groundwater monitoring planning
April 2005	—	PLN-1373, "Groundwater Monitoring Plan for the Waste Calcining Facility"	INTEC WCF groundwater monitoring planning
June 2005	—	MCP-3448, "Inclusion of New Sites under the Federal Facility Agreement and Consent Order"	Log new CERCLA sites

Table B-2. (continued).

Initial Date	Planned Date	Document/Reference	Description
August 2005	—	DOE/NE-ID-11228, <i>Operations and Maintenance Report for Operable Unit 5-12</i>	CITRC O&M planning
September 2005	—	PLN-1305, “Groundwater Monitoring Program Plan”	Sitewide groundwater monitoring program planning
December 2005	—	INEEL/EXT-2002-00779, <i>In Situ Bioremediation Remedial Action Groundwater Monitoring Plan for Test Area North, Operable Unit 1-07B</i>	TAN groundwater monitoring planning
February 2006	—	DOE/ID-11000, <i>ICDF Complex Operations and Maintenance Plan</i>	ICDF O&M planning
Level of effort	—	—	Use checklist to prequalify the receipt of a site into LTS.

CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act

CFA = Central Facilities Area

CITRC = Critical Infrastructure and Test Range Complex

FY = fiscal year

IAG = interface agreement

IC = institutional control

ICDF = Idaho CERCLA Disposal Facility

INEL = Idaho National Engineering Laboratory

INTEC = Idaho Nuclear Technology and Engineering Center

LTS = long-term stewardship

MCP = management control procedure

O&M = operations and maintenance

OU = operable unit

PLN = plan

RDX = Royal Demolition Explosive

RWMC = Radioactive Waste Management Complex

TAN = Test Area North

TNT = trinitrotoluene

WAG = waste area group

WCF = Waste Calcining Facility

Table B-3. Completed and planned ecological milestones for Strategic Objective 1.3a.

Initial Date	Planned Date	Document/Reference	Description
January 2004	—	INEEL/EXT-02-01191, <i>Long-Term Ecological Monitoring Plan for Idaho National Engineering and Environmental Laboratory</i>	Develop a long-term ecological monitoring plan.
Level of effort	—	LTS Web ( <a href="http://ltsweb.inel.gov">http://ltsweb.inel.gov</a> ), surveillance, ecological literature, and data evaluation	Survey (review) the possible sources of ecological data.

INEEL = Idaho National Engineering and Environmental Laboratory  
LTS = long-term stewardship

Table B-4. Completed and planned cultural resource milestones for Strategic Objective 1.3b.

Initial Date	Planned Date	Document/Reference	Description
May 2005	—	IAG-298, “Service Agreement for Cultural Resource Management (Other Site Service)”	Responsibility/authority for cultural resource management
June 2005	—	MCP-3448, “Inclusion of New Sites under the Federal Facility Agreement and Consent Order”	Work planning requires cultural resource impact evaluations.
September 2005	—	DOE/ID-10997, <i>Idaho National Laboratory Cultural Resource Management Plan, Rev 1 (Appendix G assigns authority for LTS activities)</i>	Cultural resource management planning
Level of effort	—	—	Single-point access to stakeholders, accomplished by the INL Cultural Resources Management Office staff

IAG = interface agreement  
INL = Idaho National Laboratory  
LTS = long-term stewardship  
MCP = management control procedure

## B-1.2 Goal 2: Maintain Acceptable Levels of Risk Established by Remedies

This section addresses the two strategic objectives of Goal 2.

### B-1.2.1 Strategic Objective 2.1

This objective is to maintain remedies as required in plans and agreements to ensure continued protectiveness of these remedies. Table B-5 lists completed and planned milestones for this objective.

Table B-5. Completed and planned milestones for Strategic Objective 2.1.

Initial Date	Planned Date	Document/Reference	Description
—	FY 2006	—	Evaluate the thoroughness and completeness of the INL LTS O&M Plan.
July 2002	—	DOE/ID-11011, <i>The 2002 Institutional Controls Inspection, Environmental Monitoring, and Site Maintenance Report for Waste Area Group 1</i>	TAN O&M and IC inspection reporting
October 2002	—	INEEL/EXT-02-01032, <i>Annual Groundwater Monitoring Status Report for the Waste Area Group 5 for Fiscal Year 2002</i>	CITRC groundwater yearly reporting
November 2002	—	DOE/ID-11018, <i>Institutional Controls Status Report for the Power Burst Facility and Auxiliary Reactor Area, Operable Unit 5-12, for the Year 2002</i>	CITRC IC yearly reporting
January 2003	—	DOE/ID-11052, <i>Fiscal Year 2002 Operations and Maintenance Report for the Central Facilities Area, Operable Unit 4-13</i>	CFA 2nd annual inspection reporting
January 2003	—	DOE/ID-11033, <i>The 2002 Institutional Controls Monitoring Report for Operable Unit 3-13</i>	INTEC IC yearly reporting
July 2003	—	DOE/ID-11108, <i>FY 2003 Annual Institutional Controls Assessment Report for the Test Reactor Area, Operable Unit 2-13</i>	Reactor Technology Complex IC yearly reporting
August 2003	—	DOE/ID-11064, <i>Institutional Controls Status Report for the Power Burst Facility and Auxiliary Reactor Area, Operable Unit 5-12, for Fiscal Year 2003</i>	CITRC IC reporting
August 2003	—	DOE/ID-11105, <i>FY 2003 Institutional Controls Assessment Report for Waste Area Group 1</i>	TAN IC yearly reporting
August 2003	—	DOE/ID-11112, <i>The 2003 Institutional Controls Monitoring Report for Operable Unit 3-13</i>	INTEC IC yearly reporting
September 2003	—	ICP/INT-05-01023, <i>Advancements and Improvements Achieved by the Idaho National Laboratory's Long-term Stewardship Program</i>	LTS progress report
September 2003	—	INEEL/EXT-03-00024, <i>Central Facilities Area Landfills I, II, and III Annual Monitoring Report (2002)</i>	CFA landfill monitoring report
September 2003	—	INEEL/EXT-03-00028, <i>Project Close-out Report for Waste Area Group 2, Test Reactor Area</i>	TRA project close-out
March 2004	—	DOE/NE-ID-11145, <i>Fiscal Year 2003 Operations and Maintenance Report for the Central Facilities Area</i>	CFA 2nd annual O&M and IC inspection reporting
September 2004	—	DOE/NE-ID-11180, <i>INEEL Sitewide Institutional Controls Annual Report – FY 2004</i>	Sitewide IC yearly reporting

Table B-5. (continued).

Initial Date	Planned Date	Document/Reference	Description
October 2004	—	DOE/ID-12082(03), <i>Idaho National Engineering and Environmental Laboratory Site Environmental Report Calendar Year 2003</i>	Environmental radiological reporting
October 2004	—	ICP/EXT-04-00149, Rev. 0, <i>Central Facilities Area Landfills I, II, and III Annual Monitoring Report (2003)</i>	CFA landfill monitoring report
November 2004	—	ICP/EXT-04-00548, <i>Fiscal Year 2003 Ecological Monitoring Annual Report</i>	Sitewide ecological monitoring reporting
November 2004	—	ICP/EXT-04-00369, Rev. 1, <i>Annual Groundwater Monitoring Status Report for Waste Area Group 5 for Fiscal Year 2004</i>	ARA/PBF groundwater monitoring report
January 2005	—	ICP/EXT-04-00727, <i>Long-Term Stewardship Fiscal Year 2004 Well Surveillance/Maintenance Report</i>	LTS Sitewide well surveillance and maintenance reporting
March 2005	—	ICP/EXT-05-00806, <i>Summary of Cleanup at the Idaho National Laboratory Site</i>	Summary of environmental cleanup activities at the Site through October 2004
May 2005	—	DOE/NE-ID-11222, <i>Annual INTEC Groundwater Monitoring Report for Group 5—Snake River Plain Aquifer (2004)</i>	INTEC and CFA groundwater monitoring reporting
June 2005	—	ICP/EXT-05-00901, Rev. 0, <i>Annual Groundwater Monitoring Status Report for Waste Area Group 5 for Fiscal Year 2005</i>	ARA/PBF groundwater monitoring report
August 2005	—	DOE/NE-ID-11228, <i>Operations and Maintenance Report for Operable Unit 5-12</i>	CITRC O&M yearly reporting
August 2005	—	<i>Project Close-out Report for Waste Area Group 4, Central Facilities Area</i>	CFA project close-out report
September 2005	—	DOE/ID-11250, <i>INL Sitewide Institutional Controls Annual Report—FY 2005</i>	IC yearly reporting
September 2005	—	DOE/ID-11249, <i>INL Sitewide Operations and Maintenance Report for CERCLA Response Actions—FY 2005</i>	Sitewide O&M yearly reporting
September 2005	—	ICP/EXT-05-00983, <i>Biennial Remedial Action Status Report for the OU 7-08 Organic Contamination in the Vadose Zone Project</i>	Vadose zone efforts reporting
September 2005	—	ICP/EXT-05-00985, <i>Environmental and Operational Midyear Data Report for the OU 7-08 Organic Contamination in the Vadose Zone Project—2005</i>	Vadose zone efforts reporting
September 2005	—	ICP/EXT-05-00973, <i>Project Close-Out Report for Waste Area Group 5</i>	CITRC project close-out reporting
September 2005	—	ICP/EXT-05-00915, <i>Central Facilities Area Landfills I, II, and III Annual Monitoring Report – 2004</i>	CFA landfill monitoring report

Table B-5. (continued).

Initial Date	Planned Date	Document/Reference	Description
October 2005	FY 2010	DOE/NE-ID-11201, <i>Five-Year Review of CERCLA Response Actions at the Idaho National Laboratory</i>	The main report to the Agencies and the public
February 2006	—	ICP/EXT-05-01051, <i>Fiscal Year 2004 Ecological Monitoring Annual Report</i>	Ecological reporting from the OU 10-04 ROD
February 2006	—	ICP/EXT-05-01014, <i>Waste Area Group 10 Annual Operations and Maintenance Report – FY 2005</i>	WAG 10 annual O&M report

ARA = Auxiliary Reactor Area  
 CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act  
 CFA = Central Facilities Area  
 CITRC = Critical Infrastructure and Test Range Complex  
 FY = fiscal year  
 IC = institutional control  
 INEEL = Idaho National Engineering and Environmental Laboratory  
 INL = Idaho National Laboratory  
 INTEC = Idaho Nuclear Technology and Engineering Center  
 LTS = long-term stewardship  
 O&M = operations and maintenance  
 OU = operable unit  
 PBF = Power Burst Facility  
 ROD = Record of Decision  
 TAN = Test Area North  
 TRA = Test Reactor Area (now the Reactor Technology Complex [RTC])  
 WAG = waste area group

### B-1.2.2 Strategic Objective 2.2

This objective is to develop or revise procedures for implementing emergency response to failures of remedies or LTS institutional controls (ICs). Table B-6 lists planned milestones for this objective.

Table B-6 lists planned milestones for Strategic Objective 2.2.

Table B-6. Planned milestones for Strategic Objective 2.2.

Initial Date	Planned Date	Document/Reference	Description
	FY 2007	—	Draft an emergency response to catastrophic natural events plan (review and update annually).
Level of effort	—	No formal report is required.	Provide annually updated CERCLA location maps (GIS lab).
Level of effort	—	No formal report is required.	Provide annually updated wildland location maps, for official use only (GIS lab).

CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act  
 FY = fiscal year  
 GIS = geographical information system

### **B-1.3 Goal 3: Sustain Knowledge of Residual Contamination in a Manner that Retains the Relevance, Accessibility, and Integrity of the Information for Stewards, Decision-Makers, and Affected Parties**

This section addresses the two strategic objectives of Goal 3.

#### **B-1.3.1 Strategic Objective 3.1**

This objective is to develop a comprehensive system to identify and manage the data and information essential for the implementation of LTS. Table B-7 lists completed and planned milestones for this objective.

Table B-7. Completed and planned milestones for Strategic Objective 3.1.

Initial Date	Planned Date	Document/Reference	Description
August 2003	—	PLN-1385, “Environmental Data Warehouse Software Configuration Management Plan”	EDW software and hardware planning
September 2003	—	INEEL/EXT-03-00794, <i>INEEL Long-Term Stewardship Information Management Plan</i>	Information management planning
July 2004	—	ICP/INT-04-00286, <i>Environmental Data Warehouse Software Requirements Specification</i>	EDW software specifications
January 2005	—	“Idaho Completion Project Long-Term Stewardship Tracking System (Draft)”	Tracking system overview (salient CERCLA information not found in the AR/IR)
January 2005	—	“INEEL LTS Information Management System Functional Requirements Document (Draft)”	Information management background information
January 2005	FY 2006	“INEEL Long-Term Stewardship Ecological Information Integration Strategy (Draft)”	Develop a strategy to consolidate or integrate ecological data sources.
April 2005	—	PLN-1387, “Data Management Plan for the Idaho Completion Project Environmental Data Warehouse”	EDW data planning; develop a strategy to consolidate or integrate essential data sources.
September 2005	FY 2007	ICP/INT-05-01002, <i>Long-term Stewardship Information Management System Evaluation Plan</i>	Long-term Stewardship Information Management System Evaluation Plan
FY 2005	—	<a href="http://ltsweb.inel.gov">http://ltsweb.inel.gov</a>	Develop an internal website (this is to accommodate global positioning system coordinates not allowable on the external website).
	FY 2006	—	Conduct a test of Information Management System performance.
	FY 2007	—	Incorporate approximately 10 databases, identified in 2005, into the Common Information Management System.

Table B-7. (continued).

Initial Date	Planned Date	Document/Reference	Description
Level of effort	—	Contact the EDW data manager to obtain access to Electronic Change Log System or to enter requests.	All EDW software modifications and requested data changes are prioritized, approved, and tracked through the Electronic Change Log System.
Level of effort	—	All data quality documentation for EDW data is at the ICP Intranet homepage, search “optical,” ER Project files, Project or Case Files, and then 23826.	The EDW data quality records need to be retrievable.
Level of effort	—	LTS/BEA	Maintain the internal Comprehensive Facility and Land Use Plan (single database, external does not give global positioning system coordinates, BEA has not updated).
Level of effort	—	LTS/BEA	Maintain the external Comprehensive Facility and Land Use Plan.
Level of effort	—	—	Maintain EDW, consolidating LTS relevant data therein.
Level of effort	—	<a href="http://ar.inel.gov/about_5.htm">http://ar.inel.gov/about_5.htm</a>	Maintain the AR/IR.
Level of effort	—	—	Operate and maintain the GIS.
Level of effort	—	—	Continue to add new data (or systems) to the LTS Information Management System as required.
Level of effort	—	—	Achieve and maintain comprehensive data sets necessary for the performance of LTS functions.

AR/IR = Administrative Record and Information Repository

BEA = Battelle Energy Alliance, LLC

CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act

EDW = Environmental Data Warehouse

ER = environmental restoration

FY = fiscal year

GIS = geographical information system

ICP = Idaho Cleanup Project

INEEL = Idaho National Engineering and Environmental Laboratory

LTS = long-term stewardship

PLN = plan

### B-1.3.2 Strategic Objective 3.2

This objective is to develop an approach to provide access to LTS information for stakeholders. Table B-8 lists completed and planned general milestones for this objective.

Table B-8. Completed and planned general milestones for Strategic Objective 3.2.

Initial Date	Planned Date	Document/Reference	Description
October 2001	—	INEEL/EXT-01-01445, <i>Long-Term Stewardship Public Involvement Plan</i>	Public involvement planning
FY 2005	—	<a href="http://www.idahocleanupproject.com">www.idahocleanupproject.com</a>	Expand the external website to include selected information from the internal website.
Level of effort	—	<a href="http://ltsweb.inel.gov">http://ltsweb.inel.gov</a>	Maintain and update the INL internal LTS website quarterly.
Level of effort	—	<a href="http://www.idahocleanupproject.com">www.idahocleanupproject.com</a>	Maintain and update the INL external LTS website quarterly.
—	FY 2007	—	Select and maintain a small number of locations (physical and/or virtual) for LTS information to be made available to stakeholders (computers in public library).
—	FY 2007	—	Tailor selected LTS information to specific needs of stakeholders (Shoshone-Bannock, Citizens Advisory Board, etc.).

FY = fiscal year  
 INEEL = Idaho National Engineering and Environmental Laboratory  
 INL = Idaho National Laboratory  
 LTS = long-term stewardship

## B-1.4 Goal 4: Support Stakeholder and Shoshone-Bannock Tribal Understanding of and Involvement in Long-Term Stewardship

This section addresses the two strategic objectives of Goal 4.

### B-1.4.1 Strategic Objective 4.1

This objective is to identify the appropriate levels of stakeholder involvement in INL Site LTS decisions and actions. Table B-10 lists completed and planned milestones for Strategic Objectives 4.1 and 4.2.

### B-1.4.2 Strategic Objective 4.2

This objective is to maintain close relationships and communication with programs, agencies, stakeholders, and members of the Shoshone-Bannock Tribes to ensure that the U.S. Department of Energy consistently understands and considers all LTS issues and concerns. Table B-9 lists completed and planned milestones for Strategic Objectives 4.1 and 4.2.

Table B-9. Completed and planned general milestones for Strategic Objectives 4.1 and 4.2.

Initial Date	Planned Date	Document/Reference	Description
FY 2002	—	Communication lead for Miscellaneous Sites group	Establish an interface with ICP communications to respond to stakeholder requests, including Citizens Advisory Board meetings.
December 2003	—	DOE/NE-ID-11132, <i>Long-Term Stewardship Public Involvement Report for Fiscal Year 2003</i>	Provide and maintain public contact with all stakeholders to facilitate information transfer and obtain LTS strategy input. Design and implement a proactive outreach program and deliver an LTS town hall meeting.
January 2004	—	INEEL/EXT-02-01191, <i>Long-Term Ecological Monitoring Plan for the Idaho National Engineering and Environmental Laboratory</i>	Support others in completing the ecological conservation management plan, including public interaction with stakeholders.
August 2004	—	DOE/ID-10997, <i>Idaho National Laboratory Cultural Resource Management Plan</i> , DOE/ID-10997, Rev. 1 (Appendix G assigns authority for LTS activities.)	Support others in completing the cultural management plan, including public interaction with stakeholders.
Level of effort	—	—	Maintain and update the INL LTS website quarterly (external).
Level of effort	—	—	Achieve and maintain a regular exchange of information with members of the Shoshone-Bannock Tribes.
January 1994	—	Memorandum of Agreement Between DOE-ID and the Shoshone-Bannock Tribes	Middle Butte Tribal access
December 2002	—	Agreement in Principle Between the Shoshone Bannock Tribes and DOE	DOE/Tribal working agreement

DOE = U.S. Department of Energy  
 DOE-ID = U.S. Department of Energy Idaho Operations Office  
 FY = fiscal year

ICP = Idaho Cleanup Project  
 INL = Idaho National Laboratory  
 LTS = long-term stewardship

### B-1.5 Goal 5: Incorporate Long-Term Stewardship into the Idaho Cleanup Project/Idaho National Laboratory's Decision-Making Process

This section addresses the two strategic objectives of Goal 5.

#### B-1.5.1 Strategic Objective 5.1

This objective is to evaluate and revise, as necessary, existing ICP/INL policies and procedures to ensure consistent integration of LTS considerations in INL Site decisions. Table B-10 lists planned general milestones for this objective.

Table B-10. Planned general milestones for Strategic Objective 5.1.

Initial Date	Planned Date	Document/Reference	Description
—	FY 2006	—	Participate in the remedy decision process to ensure that LTS considerations are accounted for in the selection of the remedy.
—	FY 2006	—	Obtain “mandatory” review status for LTS in the preparation and approval of ICP documents related to potential remedies.
—	FY 2006	—	Exercise review status for LTS in the preparation and approval of ICP documents related to potential remedies.

FY = fiscal year  
 ICP = Idaho Cleanup Project  
 LTS = long-term stewardship

**B-1.5.2 Strategic Objective 5.2**

This objective is to incorporate LTS considerations into budget and work planning guidance documents. Table B-11 lists planned general milestones for this objective.

Table B-11. Planned general milestones for Strategic Objective 5.2.

Initial Date	Planned Date	Document/Reference	Description
Level of effort	—	—	Prepare the annual budget for LTS activities.
—	FY 2006	—	Develop budget preparation guidelines for active projects to include LTS activities.
—	FY 2006	—	Participate in the remedy decision process to ensure that LTS costs are accounted for in the selection of the remedy.
—	FY 2007	—	Incorporate budget preparation guidelines in ICP Detailed Work Plan preparation guidance documents.

FY = fiscal year  
 ICP = Idaho Cleanup Project  
 LTS = long-term stewardship

## B-1.6 Goal 6: Sustain the Ability to Conduct Long-Term Stewardship Activities

This section addresses the strategic objective of Goal 6.

### B-1.6.1 Strategic Objective 6.1

This objective is to identify, acquire, and manage the economic, physical, and human resources necessary to conduct LTS of the INL Site. Table B-12 lists planned general milestones for this objective.

Table B-12. Planned general milestones for Strategic Objective 6.1.

Initial Date	Planned Date	Document/Reference	Description
Level of effort	—	—	Prepare annual budget for all LTS activities, including full-time equivalent assignment by discipline to match the program requirements.

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LTS = long-term stewardship

## B-1.7 Goal 7: Reduce Uncertainty and Cost Related to Long-Term Stewardship Activities

This section addresses the three strategic objectives of Goal 7.

### B-1.7.1 Strategic Objective 7.1

This objective is to identify and implement lessons learned for continued improvement of LTS activities. Table B-13 lists completed and planned general milestones for this objective.

### B-1.7.2 Strategic Objective 7.2

This objective is to identify and implement new technologies and communicate technology needs to researchers for further improvement or development. Table B-14 lists planned general milestones for this objective.

Table B-13. Completed and planned general milestones for Strategic Objective 7.1.

Initial Date	Planned Date	Document/Reference	Description
FY 2005	—	—	Develop a release site tracking system to forecast newly identified sites.
Level of effort	—	—	Highlight successes and lessons learned by utilizing available company communications resources (ICliPs, etc.).
Level of effort	—	—	Make an annual presentation to the INL on the “State of the Practice” of LTS at the INL Site.
Level of effort	—	—	Stay vigilant of changes in the LTS arena and participate in meetings and conferences to learn of LTS implementation at other facilities.

Table B-13. (continued).

Initial Date	Planned Date	Document/Reference	Description
—	FY 2007	—	Perform a sensitivity analysis to identify the relative contribution to costs coming from LTS functions.
—	FY 2007	—	Benchmark costs of LTS activities at other DOE sites.
—	FY 2008	—	Self-assessment
—	FY 2008	—	Achieve and maintain reduced uncertainty on LTS costs.

DOE = U.S. Department of Energy

FY = fiscal year

INL = Idaho National Laboratory

LTS = long-term stewardship

Table B-14. Planned general milestones for Strategic Objective 7.2.

Initial Date	Planned Date	Document/Reference	Description
FY 2000	—	Initial Assessment of Long-Term Stewardship Science and Technology Needs (located at LTSWeb/Transition, <a href="http://ltsweb.inel.gov">http://ltsweb.inel.gov</a> )	Information to support LTS Science and Technology Roadmap
September 2001	—	INEEL/EXT-01-01133, “Technical Baseline for Long-term Stewardship National Program (Draft)” (draft, located at LTSWeb/Transition, <a href="http://ltsweb.inel.gov">http://ltsweb.inel.gov</a> )	Information to support LTS Science and Technology Roadmap
FY 2001	—	INEEL/EXT-01-01248, <i>Long-Term Stewardship Technology Analysis of the Office of Science and Technology Profile</i> (located at LTSWeb/Transition, <a href="http://ltsweb.inel.gov">http://ltsweb.inel.gov</a> )	Information to support LTS Science and Technology Roadmap
—	FY 2006	—	Promote collaboration between ICP and laboratory staff to share technology needs and capitalize on applicable new developments.
—	FY 2007	—	Make an annual presentation to the ICP/INL on the “State of the Practice” of LTS at the INL Site.

FY = fiscal year

ICP = Idaho Cleanup Project

INL = Idaho National Laboratory

LTS = long-term stewardship

### B-1.7.3 Strategic Objective 7.3

This objective is to develop a process for transitioning sites out of LTS. Table B-15 lists completed and planned general milestones for this objective.

Table B-15. Completed and planned general milestones for Strategic Objective 7.3.

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Initial Date	Planned Date	Document/Reference	Description
Level of effort	—	—	Interface with INL LTS to provide a smooth transition from ICP to INL.
—	2010	—	Tie LTS steady-state operations to the Site's end state plan.
—	2012	—	Complete the transition from the ICP to the INL in 2012.

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ICP = Idaho Cleanup Project  
INL = Idaho National Laboratory  
LTS = long-term stewardship  
PLN = plan

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