Rocky Flats Citizens Advisory Board Recommendation 95-9

to the Department of Energy

Mortgage Reduction Activities

Approved September 7, 1995

The Rocky Flats Citizens Advisory Board is concerned that the Department of Energy may not be doing enough to reduce the mortgage costs at Rocky Flats. Although we strongly support the current emphasis on risk reduction at the site, the budget realities dictate that Rocky Flats consider how it is going to proceed with its cleanup mission under the constraint of shrinking budgets. We believe it is important to allocate some short-term funding where long-term savings can be realized. We do realize that current efforts to stabilize and consolidate the plutonium are going to reduce the mortgage, however we believe that even more can be done at current funding levels . With the understanding that safety of the workers and the public should always be the first priority, the Citizens Advisory Board specifically recommends that DOE undertake the following:

Include D3 Activities in RFCA: By including deactivation, decontamination and decommissioning activities in Rocky Flats Cleanup Agreement (RFCA), DOE-RFFO will have a justification for obtaining adequate funding from Congress and DOE Headquarters and will have a driver for accomplishing the work. It will also assure the community that reducing the mortgage is a priority for DOE, and that these activities are being regulated by an outside agency.

Accelerate Determination of End-Use of Buildings: In order to develop a plan for deactivation and decommissioning, the site must have a long-term plan for facility use. The longer it is before DOE makes these determinations, the more money is spent in the meantime maintaining facilities that may have no further use.

Provide "Seed Money" to Deactivation Program and Return Cost-Savings to Program: Because of the cost-savings nature of deactivation activities, a relatively small initial investment can produce a self-funding program. Pilot projects have demonstrated significant cost savings associated with deactivation activities. Once the first year is funded, we recommend that the resulting cost savings be returned to the program for further deactivation activities, which should produce a partially or totally self-funding program, depending on the extent of the deactivation work. DOE management must trust that the projected cost-savings will be realized and be willing to provide the funds to get a program started.

Approve Deactivation-Related Performance Measures for FY96: DOE should approve the FY96 Kaiser-Hill performance measure that calls for a 10% reduction in building baselines, with the savings to be reinvested in deactivation work. This is another way to put a "driver" in place for mortgage reduction.

Require Plans for Spending Cost-Savings: DOE should ensure that Kaiser-Hill has done the appropriate planning for reinvesting the savings they will realize by reducing baseline by 10% in FY96. If this is not done, the self-funding result of deactivation work will not be realized. Each day that passes before the deactivation of appropriate facilities occurs is money being wasted.

Develop Mechanism for Re-Evaluating Possibly Redundant or Unnecessary Regulations: DOE and its internal and external regulators should create a group to evaluate questionable regulations. We would encourage DOE and regulator representatives to also include non-agency stakeholder representation on this group by those with technical and regulatory expertise. If a building manager or other employee is aware of an example of a regulation that adds no apparent benefit to health and safety, or is not generally effective, they could bring this to the group for review. Within the continued protective scope of the regulations, this group can look for duplications, contradictions, and ones that may need updating due to advanced technology or the change in mission at the site.

Focus on Administrative and Authorization Basis Changes: Administrative and authorization basis changes, essentially paperwork changes, are relatively cheap and available now and can lead to significant cost-savings in terms of surveillance, maintenance and other building operations without compromising health and safety goals. For example, in Building 707 reducing the frequency of three surveillance and maintenance activities resulted in projected savings of over \$400,000 over just two fiscal years. We encourage DOE to work with its regulators to identify and implement these changes as soon as possible.

Develop Budget Projections That Include Mortgage Reduction: When doing budget projections this fall, DOE should develop a budget scenario that shows the effects of maximizing mortgage reduction (projected out for five years). This information about the effects of mortgage reduction spending is currently lacking and is needed to demonstrate the necessity and advantages of mortgage reduction.

Encourage Waste Minimization, Equipment Reuse and Recycling: These practices can significantly cut down on costs and waste storage & disposal needs for deactivation, decontamination and decommissioning activities.

The Board also would like to forward these other recommendations not specifically related to building use:

Look at Site Utility Costs for Potential Cost Savings: Just as an individual homeowner or business owner can make changes in energy usage and efficiency, the Rocky Flats site should be looking for any ways in which it can cut down on these utility costs. This could include cutting back on usage, working with Public Service Company to get the best rates, and looking at solar power options.

Streamline Administration: DOE should review procedures and eliminate unnecessary bureaucracy. Although this can be a problem for all federal government organizations, Rocky Flats should do all it can to organizationally and operationally "reinvent" how it does business. Management practices should ensure efficiency and accountability in everything from document cataloguing to control of office equipment.

Look for Cost-Savings in Security, Transportation & Other Services: DOE should examine expenses in these areas and look for potential savings. For example, is it necessary to have same types of security guards both inside and outside the Protected Area?

The Rocky Flats Citizens Advisory Board is a community advisory group that reviews and provides recommendations on cleanup plans for Rocky Flats, a former nuclear weapons plant outside of Denver, Colorado.

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