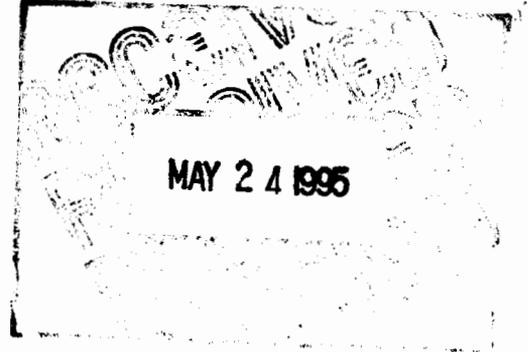




Department of Energy
Carlsbad Area Office
P. O. Box 3090
Carlsbad, New Mexico 88221

MAY 17 1995



Steve F -

Mr. Benito J. Garcia, Chief
New Mexico Environmental Department
Hazardous & Radioactive Materials
Bureau
P. O. Box 26110
Santa Fe, NM 87502

Dear Mr. Garcia:

The Office of Intergovernmental and External Affairs (OIEA) of the Carlsbad Area Office (CAO) is pleased to provide you with a *Response to Comments* document for the CAO/OIEA *Stakeholder Outreach Strategic Plan*. This document tracks and provides responses to all comments received from non-OIEA sources, including two other CAO offices (Planning and Administration and the waste transportation group of the National Transuranic Program Office), two Headquarters offices (EM-5 and EM-26), two offices of the state of New Mexico (the New Mexico Environment Department and the Energy, Minerals, and Natural Resources Department), the New Mexico Environmental Evaluation Group (EEG), and a private citizen.

For ease of reference, the *Response to Comments*, the original *Draft Stakeholder Outreach Strategic Plan*, and the final *CAO Stakeholder Outreach Strategic Plan* are included in this mailing. Some of the comments on the *Draft Plan* were only a word or two, so one needs the original document to understand the context. See column 3 of the *Response to Comments* for references to original page numbers on the *Draft Plan*.

Thank you for taking the time to comment on the *Draft Stakeholder Outreach Strategic Plan*. Everyone who commented provided important insight that helped improve our final product. We look forward to working with you as we implement the *Plan*.

Sincerely,


Dennis Hurtt, Team Leader
Office of Intergovernmental and
External Affairs

Enclosure (3)



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Carlsbad Area Office Stakeholder Outreach Strategic Plan



December 1994

DRAFT

**CARLSBAD AREA OFFICE
STAKEHOLDER OUTREACH STRATEGIC PLAN
DECEMBER 1994**

FOREWORD

As the United States approaches the Twenty-First Century, it faces enormous challenges to its ability to resolve pervasive problems, many of which are the by-products of complex technologies that were utilized to meet national security needs. One of these problems, the cleanup and disposal of radioactive wastes, is the responsibility of the U.S. Department of Energy (DOE). The DOE Carlsbad Area Office (CAO) is charged with solving one particular component of our country's nuclear waste disposal problem: the disposal of transuranic (TRU) waste and transuranic waste mixed with hazardous (non-radioactive) components, a topic of great concern to many Americans. This Strategic Plan provides the CAO's response to that public concern by outlining how it plans to inform and involve those who are concerned about or may be affected by the CAO's activities.

The CAO, established in 1993 in Carlsbad, New Mexico, manages the Waste Isolation Pilot Plant (WIPP), a fully-constructed underground disposal facility for defense-generated transuranic and transuranic-mixed (hereafter referred to as transuranic waste) nuclear waste. The CAO also oversees the National Transuranic Program Office (NTPO), whose mission is to integrate and coordinate transuranic waste activities at 10 major and several small-quantity DOE sites across the country that have generated and/or store transuranic waste. In creating the CAO, DOE took the following significant steps:

- Placed a senior manager in the field with authority and responsibility to carry out activities to support a Secretarial decision in January 1998 regarding waste disposal at WIPP;
- Charged the CAO manager to concentrate on compliance with regulations that govern the WIPP to achieve a more timely decision to determine whether to operate the WIPP as a disposal site;
- Cancelled the test phase involving evaluation of radioactive materials at the WIPP, deciding to conduct the needed tests in laboratories instead; and
- Committed to greater involvement by the public in its decision-making processes.

The CAO is guided by its Disposal Decision Plan, which charts regulatory, legal, experimental, site operations, transuranic waste integration, and public involvement milestones that must be accomplished before the Secretary decides in 1998 whether or not to use the facility for transuranic waste disposal. (See Attachment.)

PURPOSE

In recent years, DOE's operating environment has shifted from the secrecy required by the nuclear weapons program to the openness necessary to ensure maximum effectiveness in environmental cleanup. This change has prompted a new emphasis on gaining the public trust in DOE's activities and on public participation in its decision-making processes. The CAO's *Stakeholder Outreach Strategic Plan* supports this new paradigm. The plan is designed to:

- Communicate CAO's long-term outreach goals, strategies, and philosophies for informing and involving the public in CAO programs;
- Define the scope of CAO's stakeholder outreach programs; and
- Provide an over-arching framework to support the accomplishment of the mission of the Office of Intergovernmental and External Affairs.

MISSION

The mission of the Office of Intergovernmental and External Affairs is to provide an effective two-way communication link between interested and affected stakeholders and the CAO to foster greater understanding and meaningful involvement in achieving the CAO mission and programs.

PLANNING ASSUMPTIONS

In carrying out its mission, the Office of Intergovernmental and External Affairs operates under the following assumptions:

- A decision to open WIPP encompasses more than technical and scientific concerns. In its decisions, CAO must consider political and public policy issues and concerns raised by local, national, institutional, and international stakeholders.
- Stakeholder involvement is essential to all other CAO functions. The mission of the Office of Intergovernmental and External Affairs is linked to the mission of every other CAO branch and office. A strong partnership must exist on substantive WIPP and National Transuranic Program Office issues between the Office of Intergovernmental and External Affairs and all other CAO branches and offices.
- The Office of Intergovernmental and External Affairs operates with the input, coordination, support and involvement of the CAO manager, deputy manager, National Transuranic Program Office and branch managers and other key DOE and contractor personnel.

- **The Office of Intergovernmental and External Affairs functions as an integrated operation that includes both CAO and contractor personnel.**
- **The Office of Intergovernmental and External Affairs will assist and support the planning, implementation and evaluation of the National Transuranic Program Office and other programmatic and contractor public participation efforts.**
- **The Office of Intergovernmental and External Affairs will implement DOE Headquarters' directives regarding stakeholder participation.**
- **Funds will be available to pursue the programs identified in this plan.**

THEMES

The following themes convey the fundamental convictions of the Carlsbad Area Office. The themes will be emphasized in the ongoing communications program.

- **The CAO's highest priority is the safety of its workers and the public, and protection of the environment. The CAO conducts its operations in a safe and environmentally sound manner. It is CAO policy to operate this facility in compliance with all applicable environmental, safety and health regulations and standards.**
- **The WIPP is the appropriate solution for the safe geologic disposal of transuranic waste. The CAO is working to provide a solution to part of the nation's nuclear waste problem.**
- **Stakeholder participation is of paramount importance. Every effort is made to assure full stakeholder participation in all levels of the WIPP decision-making process.**
- **CAO programs are executed in a cost-effective, results-oriented, safe and integrated manner. This goal is achieved through a dedicated and professional work force that is effective, accountable and committed to quality products.**
- **CAO is committed to open communication among interested and affected stakeholders. DOE's goal is to dispel distrust, enhance cooperation and understanding among all parties, and ensure stakeholders' concerns about planned actions are heard and considered by DOE decision-makers.**
- **Project management can be improved by using stakeholders as a source of information for options that without their input would go unevaluated. Through stakeholder participation, the CAO hopes to have access to all relevant information in its decision making process.**

- **The WIPP is an important New Mexico asset.** It provides jobs for New Mexico citizens, tax revenue for state and local governments, and other economic benefits commensurate with those of other industries. CAO technological expertise supports New Mexico educational programs, which indirectly benefits other aspects of New Mexico's economy. Further, it demonstrates the commitment of the citizens of New Mexico to solving a critical national problem.
- **Together, the WIPP and the National Transuranic Program Office are a national asset.** Working jointly, they will create a first-of-its-kind model to solve part of the nation's radioactive waste problem. As manager of these programs, the CAO will provide leadership in regulatory compliance, waste characterization, facility operations, experimental programs, and public participation.

SITUATION ANALYSIS

The WIPP operates within a unique context: it is a clean site being prepared for the permanent disposal of radioactive wastes -- unlike other DOE sites that have been contaminated in the past and are now being cleaned up. This difference impacts our planning and operations. Three key factors in this situation are described below.

1. **Stakeholder issues could delay or preclude the opening of the WIPP.** Issues include:
 - ***Concerns about the potential safety and environment impacts that could result from the geologic disposal of radioactive waste.*** Some stakeholders object to the deep geologic disposal of radioactive waste in New Mexico and are concerned about the DOE's scientific and technical approach, particularly its assumptions and conclusions about the long-term environmental integrity of this type of facility. They also question the government's ability to predict the behavior of the waste for a 10,000 year period.
 - ***Concerns about waste transportation accidents and the potential for release of radioactive and hazardous materials to the environment.*** They are also concerned about emergency response and the ability to mitigate transuranic waste transportation accidents.
 - ***Concerns that the government will circumvent regulations and legal requirements.*** For many years, DOE was a self-regulating department, deciding in accordance with the Atomic Energy Act what laws were applicable to its operations and what constituted compliance. In 1992, the Environmental Protection Agency was established as WIPP's regulator. However, some stakeholders fear that DOE may not have changed its way of doing business.

- **Concerns about government inefficiency.** The WIPP is often criticized for the \$1.6 billion expenditure to date that has not yet resulted in the receipt of any waste. A further concern is that the government generally is not responsive, and that individual citizens' actions and concerns are irrelevant to decisions the DOE has made and will make regarding the WIPP.
 - **Concerns about nuclear proliferation.** Some stakeholders are concerned that the WIPP may support nuclear proliferation through a radioactive waste disposal capability that could allow for continued weapons development and other uses of nuclear materials.
2. **Public officials require current, balanced information to participate effectively in decisions affecting WIPP activities.** Informed action by regulators and key public officials is required before the WIPP can receive waste and operate as a repository.

Regulators:

- The Environmental Protection Agency Administrator (EPA) must certify that WIPP complies with applicable regulations.
- The New Mexico Environment Department (NMED) must issue a Resource Conservation and Recovery Act (RCRA) permit for disposal of the hazardous components in transuranic mixed waste.
- The Nuclear Regulatory Commission (NRC) must approve the Remote-Handled Waste Safety Analysis Report for Packaging.

Oversight and other Scientific Organizations:

- The National Academy of Sciences National Research Council, Board on Radioactive Waste Management, Committee on the WIPP provides independent scientific and technical review of the WIPP program.
- The New Mexico Environmental Evaluation Group, established by the U.S. Congress, provides independent reviews and evaluations of the design, construction and operations of the WIPP as they relate to protection of public health, safety, and the environment.

Key Officials:

- The Secretary of Energy is responsible for making the disposal decision once compliance certification is granted.
- Members of Congress appropriate funding and provide oversight of WIPP through various committees.
- New Mexico state officials, including the Governor of New Mexico, the Secretary of the New Mexico Environment Department and the state Attorney General, are responsible for issuance of and possibly advice on the RCRA permit.
- Congressional delegations and state and local officials of generator, host, and transportation corridor states must be confident the WIPP will provide a safe and environmentally sound solution to the transuranic waste problem.

- **The New Mexico legislature offers statutes or recommendations concerning regulations in the host state.**

These key decision makers must be responsive to the issues of their broadly-based constituents and stakeholders. These issues include the following:

- **Cost of the project;**
- **Funding for the project;**
- **Based on past history, DOE's credibility; and**
- **DOE's scientific and technical approach, assumptions, and conclusions.**

3. Some potentially affected stakeholders have limited or no information about the WIPP; others do not see its relevance to their issues. The CAO wants to assure that, when the disposal decision is made, stakeholders are informed about the issues and the CAO's mission. Challenges for CAO include:

- ***Lack of public knowledge about the project.*** Aside from environmentally and politically active groups, knowledge of the WIPP outside New Mexico tends to be limited, even near generator sites and along the transportation corridors.
- ***Differing priorities.*** Some stakeholders at generator and storage sites are concerned about a range of issues beyond transuranic waste disposal -- they do not see disposal of transuranic waste as a high priority activity compared to other radioactive waste issues at their sites.

STAKEHOLDER AUDIENCES

Local, national, institutional, and international stakeholders have interests and concerns in the process by which WIPP decisions are made and the impacts of those decisions. Our key stakeholders are listed below.

External Audiences

Regulators

- **Environmental Protection Agency**
- **New Mexico Environment Department**
- **Nuclear Regulatory Commission**
- **Mine Safety and Health Administration**

Oversight and other scientific groups

- **New Mexico Environmental Evaluation Group**
- **National Academy of Sciences**

Public officials and other government agencies

- **The New Mexico Governor's Task Force on Radioactive and Hazardous Wastes**

- The Hazardous and Radioactive Materials Committee (New Mexico)
- New Mexico State Legislature
- Congressionals, governors, mayors, and other federal, state, and local officials in the affected states, particularly generator and transportation corridor states
- The New Mexico Attorney General
- Sovereign tribal governments

Interested groups and individuals

- The host community
- Neighboring and concerned communities in New Mexico
- Communities near the generator sites and along the transportation corridors
- Civic, service, and business organizations
- Academic community
- Special interest groups
- General public

Institutional

- Sovereign tribal governments
- State government consortia
 - Western Governors' Association
 - Southern States Energy Board

International Nuclear Waste Community

- International agencies
- Country-specific agencies

Internal Audiences

- Employees
- Families
- Unions
- Contractors
- Subcontractors
- Consultants
- Retirees
- DOE headquarters

GOALS, STRATEGIES AND SUCCESS INDICATORS

To achieve our goals, the CAO will use strategies that reduce and eliminate both procedural roadblocks and substantive issues. As it responds to stakeholder issues, the CAO will seek to establish effective two-way communication and to provide information that will encourage meaningful participation.

I. Neighboring Communities and New Mexico

The majority of the Carlsbad Area Office's most active stakeholders are in New Mexico where they represent a range of viewpoints regarding WIPP. The following groupings represent that range: the State of New Mexico, the host community, and other communities in New Mexico. The goals below seek to target the needs of these groups.

Goals	Strategies	Success Indicators
<p>A. Enhance cooperative relationships with state of New Mexico officials to better understand and respond to host state issues.</p>	<ol style="list-style-type: none"> 1. Develop and implement a protocol for regular needs assessment and response to state concerns regarding CAO's interactions with the state. 2. Establish an "envoy program" with key state officials for early identification and resolution of issues. 3. Periodically assess and modify existing briefing and tour programs to meet identified needs. 4. Monitor New Mexico legislature and provide members with information. 	<ol style="list-style-type: none"> 1. DOE reaches a disposal decision with a) minimal or no procedural issues; and b) substantive issues have been considered by CAO and discussed extensively with the state. 2. The CAO's track record demonstrates reduction of adversarial exchanges and an increase in positive exchanges. 3. As indicated by informal followup with officials, the modified programs meet these officials' information needs and resolve outstanding issues. 4. CAO meets information needs.

Goal	Strategies	Success Indicators
<p>B. Improve relationships with key New Mexico communities.</p>	<ol style="list-style-type: none"> 1. Create more technology transfer opportunities. 2. Establish an "envoy program" with leaders in neighboring communities. 3. Expand educational outreach in key communities. 4. Hold public awareness meetings in selected communities to hear and respond to citizen concerns. 5. Assist neighboring communities with focused economic development efforts. 6. Target key communities for speakers bureau presentations. 7. Provide community-based media (including radio stations) with periodic updates: news releases, video backgrounders, fact sheets, and brochures. 8. Periodically evaluate and enhance existing media, tour, speakers bureau, and public information programs. 	<ol style="list-style-type: none"> 1. Establishment of "WIPP partnerships" with related industries throughout the state. 2. The number of outstanding issues with these communities decreases. 3. CAO educational support at the community, college, and high school levels results in enhanced cooperative relationships. 4. Interested stakeholders attend public awareness meetings. 5. Neighboring communities' economies diversify. 6. Feedback from speakers bureau presentations provides evidence of improved relationships. 7. Accurate media coverage of CAO issues increases in community-based media. 8. Program improvements reflect and meet local information and involvement needs.

Goals	Strategies	Success Indicators
<p>C. Enhance relationships with host community leaders, and build relationships with other community and minority interests.</p>	<ol style="list-style-type: none"> 1. Assist host community in its effort to build partnerships through an open communication network with generator site communities. 2. Increase participation with Carlsbad Department of Development to enhance community projects. 3. Identify and better inform interested and potentially affected minority populations and establish relationships that encourage full minority participation. 	<ol style="list-style-type: none"> 1. Communication network established between host communities and generator site communities, focusing on shared interests. 2. Cooperative relationship with community results in enhanced substantive projects spearheaded by the Department of Development. 3. Active and informed participation in CAO-related activities by minorities.

Goal	Strategies	Success Indicators
<p>D. Develop and enhance relationships with other federal agencies in New Mexico to improve coordination on shared issues.</p>	<ol style="list-style-type: none"> 1. Coordinate outreach activities with other DOE offices and national laboratories. 2. Identify shared issues and establish cooperative relationships with New Mexico offices of other federal agencies. 	<ol style="list-style-type: none"> 1. Working relationships established; potential schedule conflicts reduced; other offices and labs understand and support CAO mission. 2. Regular communication established. Potential miscommunications avoided.

II. Nationwide Program

Many of our goals and strategies for the New Mexico program apply to the nationwide program. The following are additional goals and strategies specific to national needs, particularly at generator sites and along the transportation corridor.

Goals	Strategies	Success Indicators
<p>E. Optimize program outreach through synergy with DOE Headquarters.</p>	<p>1. Seek active headquarters support for and participation in CAO outreach activities.</p>	<p>1. Headquarters Offices of Public Accountability and Public and Consumer Affairs help support CAO's goals.</p>
<p>F. Effectively implement targeted stakeholder communications by teaming with transuranic waste generator sites.</p>	<p>1. Build and maintain broad stakeholder mailing list in conjunction with generator sites.</p> <p>2. Work with generator sites to inform staff of CAO program and progress:</p> <ul style="list-style-type: none"> • roles and responsibilities; • current status; • availability of CAO informational materials for generator site reading rooms. <p>3. Quantify attitudes and awareness about WIPP.</p> <p>4. Work with generator sites to develop and implement site-specific outreach programs regarding WIPP including:</p> <ul style="list-style-type: none"> • key official and media briefings; • speakers bureau presentations; and • WIPP site tours. 	<p>1. CAO mailing list includes generator site key stakeholders.</p> <p>2. Generator site staff:</p> <ul style="list-style-type: none"> • speak knowledgeably about CAO programs; and • coordinate outreach activities with CAO outreach efforts. <p>3. CAO outreach program addresses identified issues.</p> <p>4. Generator sites' outreach plans incorporate WIPP issues, and generator site stakeholders develop a better understanding of the CAO mission and goals.</p>

Goals	Strategies	Success Indicators
<p>G. Expand interactions with key public officials to increase their information about and understanding of WIPP status, issues, and needs.</p>	<ol style="list-style-type: none"> 1. Develop and implement a comprehensive outreach program: <ul style="list-style-type: none"> • understand public opinions and information needs; • develop strategies and priorities; • provide information; • develop targeted programs with key messages that respond to stakeholder concerns; and • increase stakeholder participation. 2. In conjunction with generator sites, develop comprehensive stakeholder mailing list. 3. Provide key public officials regular information through "CAO update" and other communications vehicles. 4. Implement more extensive, targeted site tour program. 5. Provide informational briefings to key public officials. 6. Provide traveling information teams to address local concerns. 7. Fulfill informational requests from target audiences. 	<ol style="list-style-type: none"> 1. Provide an implementation plan for CAO review and approval. 2. CAO mailing list includes key contacts from all generator sites. 3. Regular, effective communications provided to key public officials; awareness of CAO mission enhanced. 4. Site tours for public officials increase. 5. Key public officials demonstrate greater understanding of CAO issues. 6. CAO positive interactions with key public officials increase. 7. Followup questions and responses tracked.

Goal	Strategies	Success Indicators
<p>H. Enhance national stakeholder understanding of and support for CAO mission and value.</p>	<ol style="list-style-type: none"> 1. Implement and coordinate outreach activities among transportation states, generator states, and other national stakeholders. 2. Identify key contacts in the corridor states to add to the mailing list. 3. Quantify attitudes and awareness about CAO mission. 4. Adapt and apply existing outreach programs around the country: targeted tours, speakers bureau, exhibit program, informational materials. 5. Develop and implement vigorous media program with national print and broadcast media and trade publications: <ul style="list-style-type: none"> • visits; • editorial board briefings; and • op-ed pieces. 6. Develop and implement program to verify that messages are reaching appropriate audiences and addressing relevant local concerns. 	<ol style="list-style-type: none"> 1. Public knowledge of WIPP mission and value increases. 2. Mailing list will include key contacts throughout transportation corridor. 3. CAO will understand and respond to stakeholder issues and concerns. 4. Existing programs provide information to organizations representing community leadership around the country and to potentially affected key stakeholders. 5. Balanced coverage in key target media increases. 6. Positive stakeholder interaction with CAO increases.

Goals	Strategies	Success Indicators
<p>I. Improve relationships with key special interest groups.</p>	<ol style="list-style-type: none"> 1. Establish an "envoy program" with key groups and individuals for: <ul style="list-style-type: none"> • early issue identification; • resolution of issues; and • prompt routine information exchange. 2. Conduct periodic meetings: <ul style="list-style-type: none"> • elicit concerns; and • respond to issues. 3. Develop and implement program to verify that messages are reaching appropriate audiences and addressing relevant local concerns. 4. Make speakers available to discuss key issues in depth. 5. Increase site tours. 6. Provide technical support to key interest groups to help them understand technical documents. 	<ol style="list-style-type: none"> 1. Relationships improve. 2. Stakeholders participate in the regulatory compliance process as they help plan and participate in meetings. 3. Positive stakeholder interactions with CAO increase. 4. Dialogue enhances mutual understandings. 5. WIPP site tours among key interest groups increase. 6. Dialogue enhances mutual understandings, addresses issues of concern.
<p>J. Encourage and facilitate broad stakeholder participation in planning and decision-making processes.</p>	<ol style="list-style-type: none"> 1. Establish processes to: <ul style="list-style-type: none"> • assess needs regularly; • acknowledge and respond to concerns; • incorporate stakeholder input into documents and decisions; and • provide feedback on CAO's response. 2. Explore advisability of citizens' advisory initiative. 	<ol style="list-style-type: none"> 1. CAO establishes documented track record of consistent, responsive interaction with key interest groups. 2. Complete analysis of issue for management review.

Goals	Strategies	Success Indicators
<p>K. Assure communication lines are open between CAO and stakeholders.</p>	<ol style="list-style-type: none"> 1. Establish a document distribution policy that facilitates public information access. 2. Develop and implement training to improve CAO's ability to work effectively with special interest groups: <ul style="list-style-type: none"> • listening skills; • presentation skills; • conflict resolution; • media relations; and • other communication skills. 3. Establish a toll-free information line. 4. Establish a CAO Public Information Center in Carlsbad to provide broad document services and evaluate and support the reading room program as necessary. 5. Improve exhibit program to increase public knowledge of the CAO mission. 6. Distribute regular update publication to stakeholders. 7. Maintain current database: <ul style="list-style-type: none"> • stakeholders; • public officials; and • media. 8. Develop closer interface with DOE Headquarters. 9. Encourage increased media participation. 	<ol style="list-style-type: none"> 1. Repeat requests for the same information are eliminated; response time is improved. 2. Key CAO staff and contractors use new communication skills in their interactions with interest groups, and CAO communications with stakeholders improve. 3. CAO establishes toll-free line, and stakeholders use it. 4. CAO Public Information Center is widely used; document delivery time is reduced; and nationwide reading room program is improved. 5. Exhibits along transportation routes and other key locations increase knowledge of WIPP. 6. Stakeholders receive update publication. 7. All interested stakeholders receive mailings. 8. HQ Offices of Public Accountability and of Public and Consumer Affairs add value to CAO outreach efforts. 9. Accurate media coverage increases.

III. Institutional Programs

Institutional programs focus on tribal governments, government consortia (such as the Western Governors' Association and the Southern States Energy Board), and state agreements (including emergency response). Most of the goals and strategies for the New Mexico and National Programs will be applied to the Institutional Program. Additional strategies follow.

Goal	Strategies	Success Indicators
L. Develop ability among CAO staff to recognize and respond to the concerns and needs of the sovereign tribal nations.	1. Provide sensitivity training to selected CAO staff and contractors.	1. Interactions focus on resolution of substantive issues.

Goal	Strategies	Success Indicators
<p>M. Increase awareness and support among institutional and tribal groups of the CAO mission and value.</p>	<ol style="list-style-type: none"> 1. Develop and implement an educational program designed to communicate effectively with tribal audiences. 2. Assess and respond to needs and concerns of tribal governments and institutions. 3. Develop and implement a program of visits and briefings to tribal governments and institutions. 4. Implement an "envoy program" with key points of contact among tribes and institutions. 5. Enhance information value of transportation emergency response exercises. 6. Foster cooperative relationships with DOE Headquarters, the Albuquerque Operations Office, and the generator sites regarding tribal information and involvement activities. 	<ol style="list-style-type: none"> 1. Tribes and institutions demonstrate increased awareness of the CAO mission. 2. CAO successfully negotiates tribal and state agreements, as needed. 3. Understanding of CAO mission increases among tribal governments and institutions. 4. Working relationships with tribal and institutional leaders improve. 5. Emergency responders, media, local officials, and residents in communities where exercises are conducted gain better understanding of CAO mission. 6. Activities regarding tribal involvement goals of Headquarters, the Albuquerque Operations Office, and the generator sites, and those of CAO are mutually supportive.

IV. International Programs

The CAO believes radioactive waste managers worldwide have much to share. Several of the goals and strategies above can be applied to this international effort. The primary goal and strategies follow.

Goal	Strategies	Success Indicators
N. Foster international exchange and support for the CAO mission.	<ol style="list-style-type: none">1. Identify and develop opportunities for communication and exchange with international organizations and country-specific programs.2. Centralize information about CAO and participant interactions with international organizations.3. Develop relationships through an envoy program for mutually beneficial exchange and support.4. Coordinate with international efforts at headquarters.5. Encourage international media to cover WIPP issues and foster international recognition of project.	<ol style="list-style-type: none">1. A network of key organizations is established.2. CAO and participants identify possible exchange and support opportunities.3. Regular communications are established.4. Headquarters and CAO efforts in the international arena are coordinated and mutually supportive.5. International coverage of U.S. nuclear remediation and waste management programs increases.

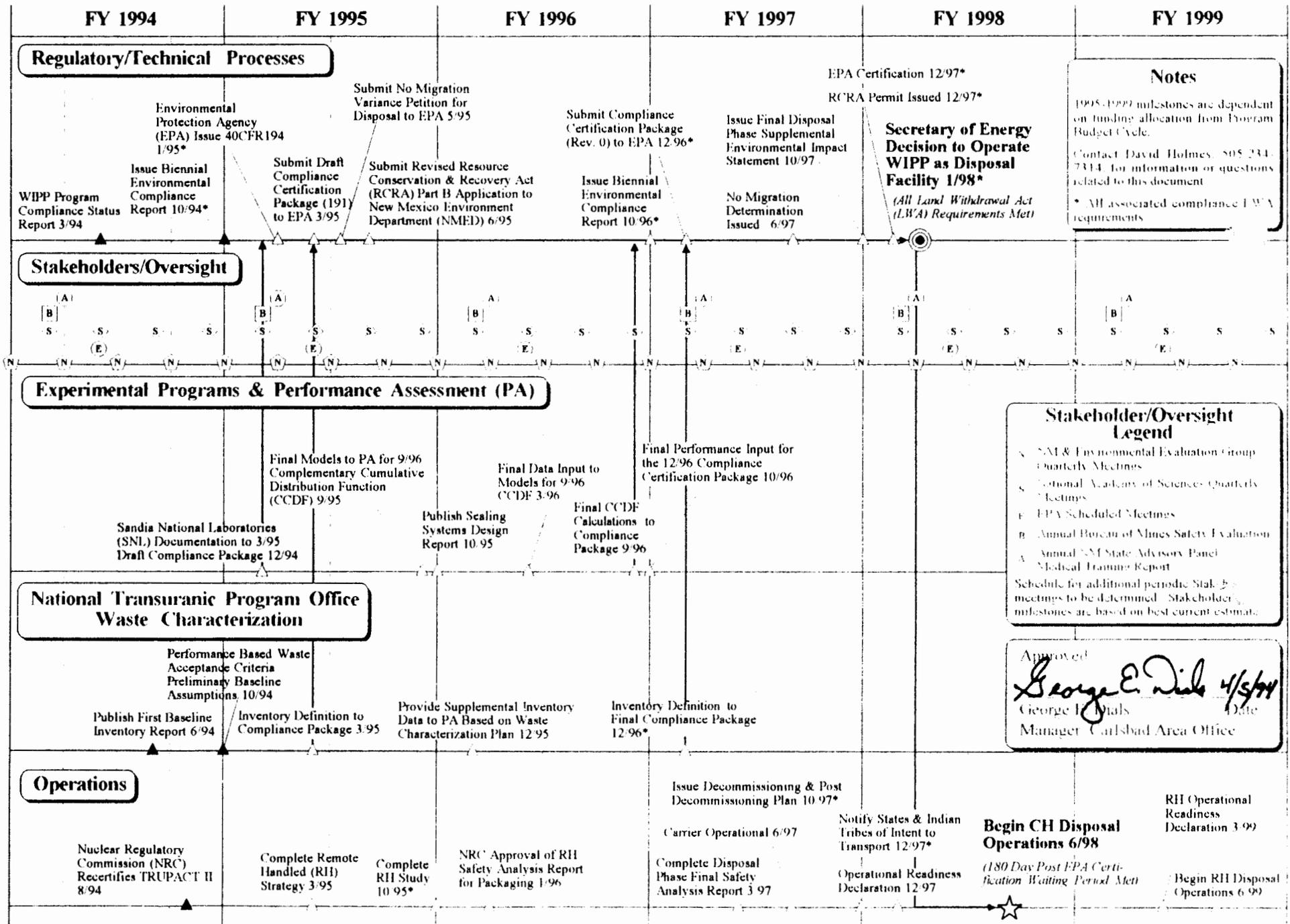
The specific details of how the CAO will achieve these goals are delineated in operational work plans, many of which share the same success indicators as this document.

UPDATING THE PLAN

This document represents the CAO's long-range strategy and approach to stakeholder involvement. But because the WIPP Project is dynamic, and the future will be different than we envision it now, the plan represents a work in progress. It will be reviewed annually and revised to reflect future needs based upon changes occurring in our operating environment.

WIPP Disposal Decision Plan

April 5, 1994

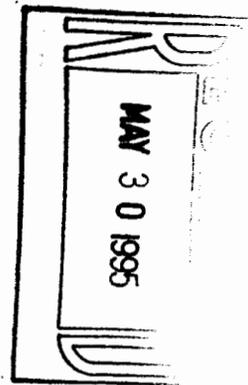


Response to Comments

CAO/OIEA

Stakeholder Outreach Strategic Plan

May 1995



Slide T

Introduction

During the preparation of the *Stakeholder Outreach Strategic Plan*, the Carlsbad Area Office (CAO) invited stakeholders who have had a long-term, abiding interest in the Waste Isolation Pilot Plant (WIPP) to comment on a review draft. These stakeholders offered numerous good suggestions, many of which were used to make the document better.

Of 96 comments provided, 64 were used (some with modification); 18 were not used for a variety of reasons; 12 were no longer applicable (primarily because text had been deleted in the interests of streamlining the document); and seven were referred to the upcoming implementation plans.

A summary of how the comments were used is presented on the pages that follow. A copy of the original draft of the plan is included for reference so that readers can match the page references (see column 3 throughout this document) with comments provided.

Commenters on the draft include the following:

- NMED** New Mexico Environment Department
- EEG** New Mexico Environmental Evaluation Group
- EMNRD** New Mexico Energy, Minerals, and Natural Resources Department
- Peter Gray** Peter Gray, environmental writer
- CAO Transp** Carlsbad Area Office transuranic waste transportation group
- CAO Admin** Carlsbad Area Office Planning and Administration
- EM-26** Office of Transportation, Emergency Management and Analytical Services
- EM-5** Office of Public Accountability

**Draft Summary of Written Stakeholder Comments Received
 CAO/OIEA Stakeholder Outreach Strategic Plan
 May 1995**

No.	Letter from	December 1994 Working Draft Comment	April 1995 Final Draft Resolution
W-1ED	NMED (1-18-95)	Declarative language on page 5 may lead to conclusions that regulators are compelled to act in the manner described. (page 5, Regulators)	Language deleted from final draft.
W-2ED	NMED (1-18-95)	NMED issues hazardous waste permits pursuant to New Mexico Hazardous Waste Act, not RCRA. New Mexico Attorney General has no authority for issuance or providing advice on hazardous waste permit. (page 5, Key Officials)	Language deleted from final draft.
W-1EEG	EEG (1-26-95)	Present reasonable schedule for providing preliminary documents in a timely manner. (general comments)	Comment accepted with modification, incorporated page 3.
W-2EEG	EEG (1-26-95)	Edit to eliminate overstatement and unnecessary modifiers. (general comments)	Comment accepted, incorporated page 4 and throughout document.
W-3EEG	EEG (1-26-95)	Avoid buzzwords, promising what DOE can't deliver and unneeded self-criticism. (general comments)	Comment accepted, document edited throughout.

No.	Letter from	December 1994 Working Draft Comment	April 1995 Final Draft Resolution
W-4EEG	EEG (1-26-95)	Include some considerations of implementation. (general comments)	Will be included in the <i>Carlsbad Area Office Stakeholder Outreach Implementation Plan</i> (under preparation).
W-5EEG	EEG (1-26-95)	Recognize that special interest groups include others besides anti-nuclear and environmental groups. (general comments)	Comment accepted, incorporated page 18.
W-6EEG	EEG (1-26-95)	Add the word "defense" before transuranic. (Foreword, page 1, paragraph 1, sentence 3)	Comment accepted, incorporated page 1.
W-7EEG	EEG (1-26-95)	Delete term, "fully-constructed" since only one of eight panels has been constructed. (Foreword, page 1, paragraph 2, sentence 1)	Comment accepted, incorporated page 1.
W-8EEG	EEG (1-26-95)	Four infinitive phrases modifying each other. Needs editing. (Foreword, page 1, paragraph 2, bullet 2)	Comment accepted, incorporated page 2.
W-9EEG	EEG (1-26-95)	Clarify "evaluation of radioactive materials" and where alcove tests are being conducted. (Foreword, page 1, paragraph 2, bullet 3)	Comment accepted, incorporated page 2.
W-10EEG	EEG (1-26-95)	The nuclear weapons program still requires secrecy. Implication otherwise needs to be corrected. (Purpose, page 2, paragraph 1, sentence 1)	Comment accepted, incorporated page 2.
W-11EEG	EEG (1-26-95)	Re-write and edit language. (Purpose, page 2, paragraph 1, bullet 3)	Comment accepted, incorporated page 2.

No.	Letter from	December 1994 Working Draft Comment	April 1995 Final Draft Resolution
W-12EEG	EEG (1-26-95)	Re-write OIEA mission. (page 2)	Comment noted, no changes made; mission statement dovetails with overall CAO mission and those of individual departments. (page 3)
W-13EEG	EEG (1-26-95)	Delete entire bullet. OIEA is internal to CAO only. (Planning Assumptions, page 2, bullet 2)	Comment noted, not incorporated -- stakeholders are involved in many programmatic activities and decisions. (page 3)
W-14EEG	EEG (1-26-95)	Gratuitous. (Planning Assumptions, page 2, bullet 3)	Comment noted; language changed, page 3.
W-15EEG	EEG (1-26-95)	Show how OIEA will assist in the planning and implementation of the NTPO and other contractor public participation efforts. (Planning Assumptions, page 3 bullet 5)	Comment accepted, incorporated page 3.
W-16EEG	EEG (1-26-95)	Include another bullet regarding EEG, and the National Academy of Sciences (NAS), and the CAO's efforts to promptly provide reports and information to them. (Planning Assumptions, page 3, bullet 8)	Comment accepted with modification, incorporated page 3.
W-17EEG	EEG (1-26-95)	Include addition to CAO's priorities -- health and safety are "one of CAO's priorities," not the "highest." (Themes, page 3, bullet 1)	Comment accepted, incorporated page 4.
W-18EEG	EEG (1-26-95)	Include additional bullet -- the CAO will develop documentation for decisions regarding the disposal of TRU waste. (Themes, page 3)	Comment accepted with modification, incorporated page 4.

No.	Letter from	December 1994 Working Draft Comment	April 1995 Final Draft Resolution
W-19EEG	EEG (1-26-95)	Re-write -- statement suggests DOE is self-regulator and self-determinator as to whether WIPP is appropriate for TRU waste. (Themes, page 3, bullet 2)	Comment accepted, incorporated page 4.
W-20EEG	EEG (1-26-95)	Delete statement. (Themes, page 3, bullet 4)	Comment accepted with modification, page 4.
W-21EEG	EEG (1-26-95)	Add a sentence on impact of WIPP after decommissioning regarding tax revenues, economic impacts, etc. (Themes, page 4, bullet 7)	Comment noted, not applicable under scope of document.
W-22EEG	EEG (1-26-95)	Add another bullet regarding lack of resolution of issues to meet artificial schedule. (Situation Analysis page 5, addition of bullet 6)	Comment accepted, incorporated page 6.
W-23EEG	EEG (1-26-95)	Re-write to describe EEG function more fully. (Situation Analysis, page 5, bullet 2)	Language deleted from final draft (page 17).
W-24EEG	EEG (1-26-95)	Suggested re-write: "Congress appropriates funding and provides oversight of WIPP through various committees." (Situation Analysis, Key Officials, page 5)	Language deleted from final draft (page 17).
W-25EEG	EEG (1-26-95)	Delete entire bullet. (Situation Analysis, Key Officials page 5, bullet 3)	Language deleted from final draft (page 17).
W-26EEG	EEG (1-26-95)	Add the word "transportation" before the last word of the bullet, "problem." (Situation Analysis, Key Officials, page 5)	Language deleted from final draft (page 17).

No.	Letter from	December 1994 Working Draft Comment	April 1995 Final Draft Resolution
W-27EEG	EEG (1-26-95)	Re-write to clarify that NM legislature passes laws, and agencies implement the subsequent regulations. (Situation Analysis, Key Officials, page 6)	Language deleted from final draft (page 17).
W-28EEG	EEG (1-26-95)	Add WIPP Committee after NAS. (Stakeholder Audiences, page 6, bullet 2)	Comment accepted, incorporated page 16.
W-29EEG	EEG (1-26-95)	Name the host community. Loving, NM, is closest but it is not the host community. (Stakeholder audiences, page 6, bullet 1)	Comment noted, no changes made -- host community is identified on page 4.
W-30EEG	EEG (1-26-95)	Suggest DOE headquarters be listed as a "regulator" although the department hasn't historically behaved as one, and list HQ first under internal audiences. (Stakeholder Audiences, page 7, last bullet)	Comment accepted, incorporated pages 17 and 18.
W-31EEG	EEG (1-26-95)	A strategy that will reduce and eliminate substantive issues is not a reassuring one. (page 8)	Comment accepted, language modified page 7.
W-32EEG	EEG (1-26-95)	Add goal, strategies and success indicator regarding timeliness of response to inquiries (page 11, I. E.)	Comment accepted with modification, incorporated page 3, under Planning Assumptions.
W-33EEG	EEG (1-26-95)	Suggest deleting strategy on providing technical support to key interest groups; delete two success indicators regarding relationship improvements (page 15, II. I.)	First part of comment accepted, language modified; second part of comment noted, no changes made (page 11).

No.	Letter from	December 1994 Working Draft Comment	April 1995 Final Draft Resolution
W-34EEG	EEG (1-26-95)	Suggest additional goal, strategy and success indicator regarding facilitating work of scientific review and oversight groups. (page 18, II. N.)	Comment accepted with modification, incorporated page 3, under Planning Assumptions.
W-1EMNRD	EMNRD (1-27-95)	Add a definition of the word "stakeholder." (Purpose, page 2, bullet 2)	Comment accepted, incorporated page 2.
W-2EMNRD	EMNRD (1-27-95)	Reference DOE HQ Public Involvement Policy and DOE/EM Public Participation Implementation Plan as foundation for all DOE stakeholder activities. (general)	Comment accepted, incorporated pages 1 (Foreword), 3 (Planning Assumptions).
W-3EMNRD	EMNRD (1-27-95)	Integration of regulator and stakeholder concerns must be successful if a decision to open WIPP is made. (Planning Assumptions, page 2)	Comment accepted, incorporated page 3.
W-4EMNRD	EMNRD (1-27-95)	Include text on the importance of regulatory compliance and the role of the public in seeking required permits. (Themes, page 4)	Comment accepted, incorporated page 3, under Planning Assumptions.
W-5EMNRD	EMNRD (1-27-95)	The second bullet should read, "The WIPP is the most promising solution for the safe geologic disposal of transuranic waste." (Themes, page 3)	Comment accepted with modification, incorporated page 4.
W-6EMNRD	EMNRD (1-27-95)	Clarify "full stakeholder participation." (Themes, page 3)	Language deleted from final draft.

No.	Letter from	December 1994 Working Draft Comment	April 1995 Final Draft Resolution
W-7EMNRD	EMNRD (1-27-95)	The sixth bullet should read, "Project management can be improved by using stakeholders as a source of information for options that would otherwise not be considered or evaluated." (Themes, page 3)	Comment accepted with modification, incorporated page 4.
W-8EMNRD	EMNRD (1-27-95)	Substitute "disposal system" for "waste." (Situation Analysis, page 4, #1, first bullet, last sentence)	Comment accepted, incorporated page 5.
W-9EMNRD	EMNRD (1-27-95)	Insert the word "primary" before "regulator." (Situation Analysis, page 4, third bullet, third sentence)	Language deleted from final draft.
W-10EMNRD	EMNRD (1-27-95)	Say public officials require current, "accurate" or "factual" information. What may be considered "balanced" information is subjective. (Situation Analysis, page 5)	Comment accepted, incorporated page 6.
W-11EMNRD	EMNRD (1-27-95)	Insert U.S. before Environmental Protection Agency and Nuclear Regulatory Commission. (Situation Analysis, page 5)	Comment accepted, incorporated page 17.
W-12EMNRD	EMNRD (1-27-95)	There are other WIPP regulators not mentioned here (i.e., those identified in Comprehensive Biennial Environmental Compliance Report). (Regulators, page 5)	Comment accepted, incorporated page 17.

No.	Letter from	December 1994 Working Draft Comment	April 1995 Final Draft Resolution
W-13EMNRD	EMNRD (1-27-95)	Suggested re-write: "New Mexico State officials, including Governor, Cabinet Secretaries.... and the Attorney General are generally responsible for ensuring adequate protection of public health....from those risks posed by the WIPP project." (Key Officials, page 5)	Comment accepted with modification, page 17.
W-14EMNRD	EMNRD (1-27-95)	The fourth bullet infers this grouping of affected stakeholders is uniformly interested in the safety of the WIPP repository. WIPP stakeholders are diverse, and care must be taken in characterizing their interests and methods of interaction. (page 5)	Section deleted from final draft (pages 6, 17).
W-15EMNRD	EMNRD (1-27-95)	Add two more items the key decision makers must consider: worker and public safety and environmental protection. (Key Officials, page 6)	Section deleted from final draft (pages 6, 17).
W-16EMNRD	EMNRD (1-27-95)	Correct "The New Mexico Governor's Task Force on Radioactive and Hazardous Waste" to the "New Mexico Radioactive Waste Consultation Task Force." (Stakeholder Audiences, page 6)	Comment accepted, incorporated page 17.

No.	Letter from	December 1994 Working Draft Comment	April 1995 Final Draft Resolution
W-17EMNRD	EMNRD (1-27-95)	Two bullets should be combined to read, "New Mexico State Legislature, particularly the Joint Interim Radioactive and Hazardous Materials Committee. (Stakeholder Audiences, page 7)	Comment accepted with modification, page 17.
W-18EMNRD	EMNRD (1-27-95)	Clarify which stakeholders are described by "Special Interest Groups." (Stakeholder Audiences, page 7)	Comment noted, no changes made; detail beyond the scope of document, page 17.
W-19EMNRD	EMNRD (1-27-95)	Disagreement with identifying stakeholders by proximity to the WIPP. (page 8)	Comment noted, no changes made; categorization method adequate for purposes of this document, page 7.
W-20EMNRD	EMNRD (1-27-95)	Interim success indicators needed to assist CAO in evaluating if it is on the right path to enhancing cooperative relationships with state officials. (page 8)	Will be included in the <i>Carlsbad Area Office Stakeholder Outreach Implementation Plan</i> (under preparation).
W-21EMNRD	EMNRD (1-27-95)	Baseline needed to document CAO's record regarding adversarial/positive exchanges with state officials. (page 8)	Will be included in the <i>Carlsbad Area Office Stakeholder Outreach Implementation Plan</i> (under preparation).
W-22EMNRD	EMNRD (1-27-95)	Revise strategy to read, "Hold public awareness meetings in affected communities to hear and address citizen concerns." (page 9)	Comment accepted, incorporated page 8.
W-23EMNRD	EMNRD (1-27-95)	Attendance at meetings does not necessarily translate into improved relationships. (Success Indicator, page 9).	Comment accepted, incorporated page 8.

No.	Letter from	December 1994 Working Draft Comment	April 1995 Final Draft Resolution
W-24EMNRD	EMNRD (1-27-95)	Identify key special interest groups. (Goal, page 15)	Comment noted, no changes made; detail beyond the scope of this document, pages 11, 17.
W-25EMNRD	EMNRD (1-27-95)	Add the following sentence, "All such reviews and revisions will be conducted in consultation with WIPP stakeholders identified in this plan." (Updating the Plan, page 19)	Comment accepted with modification, page 16.
W-1PG	Peter Gray (1-30-95)	Include "nuclear waste" after "transuranic mixed" before the parenthesis. (Foreword, page 1)	Comment noted, no changes made; unneeded clarification, page 1.
W-2PG	Peter Gray (1-30-95)	Mention EPA's role in disposal decision. (Foreword, page 1)	Comment accepted, incorporated page 2.
W-3PG	Peter Gray (1-30-95)	Explain the term "stakeholder." (Purpose, page 2)	Comment accepted, incorporated page 2.
W-4PG	Peter Gray (1-30-95)	Document doesn't indicate how DOE/CAO intends to respond to stakeholder issues pages 4-5. (general)	Comment accepted, incorporated in Goals, Strategies and Success Indicators, Sections I, II, and III.
W-5PG	Peter Gray (1-30-95)	Hard to discern in document any strategy for dealing with stakeholders' differing priorities. (page 6)	Comment noted, no changes made; will be considered in second and third level planning documents.
W-6PG	Peter Gray (1-30-95)	General comment on goals, success indicators and strategy tables: items are redundant and sound like boilerplate; not specific enough; not a clear connection between goals and issues stated previously. (pages 8-19)	Comment accepted, incorporated throughout pages 7-16; more detail will appear in task-specific OIEA implementation plans.

No.	Letter from	December 1994 Working Draft Comment	April 1995 Final Draft Resolution
W-7PG	Peter Gray (1-30-95)	Tables need to be shortened and highlight specific plans. (pages 8-19)	Comment accepted, incorporated throughout pages 7-16; more detail will appear in task-specific OIEA implementation plans.
W-1CAOT	CAO Transp. (1-18-95)	Replace "several" with "numerous" small quantity generators. (Background, page 1, second paragraph)	Comment noted, no changes made; "several" more appropriate in this context than "numerous." (page 1)
W-2CAOT	CAO Transp. (1-18-95)	Mission should include where OIEA fits into CAO organization. (page 2)	Comment noted, no changes made; OIEA's role in organization already well documented. (page 3)
W-3CAOT	CAO Transp. (1-18-95)	Change text: "NRC must approve all safety analysis reports for packaging (Type "B") that is scheduled to transport TRU material to the WIPP." (Situation Analysis, page 5)	Section deleted from final draft (page 17).
W-4CAOT	CAO Transp. (1-18-95)	Add bullet in internal audience section that includes generator/storage sites and small quantity sites. (page 7)	Comment accepted with modification (page 18).
W-5CAOT	CAO Transp. (1-18-95)	Strategies 2, 3 and 4 need to be explained in detail. (page 8)	Comment will be addressed in <i>Carlsbad Area Office Stakeholder Outreach Implementation Plan</i> .
W-1CAOA	CAO Admin. (12-20-94)	Goal C success indicators hard to measure and are subjective. (page 10)	Comment noted, no changes made. (page 9).
W-2CAOA	CAO Admin. (12-20-94)	Activities need to be prioritized in accordance with available budget. (general)	Comment accepted, incorporated page 6.

No.	Letter from	December 1994 Working Draft Comment	April 1995 Final Draft Resolution
W-1EM26	EM-26 (1-13-95)	Document should emphasize importance of DOE and contractors' understanding of WIPP mission. (general)	Comment accepted, incorporated page 9.
W-2EM26	EM-26 (1-13-95)	A more detailed plan is needed to show WIPP will work with generator sites on stakeholder issues and information dissemination. (general)	Comment will be addressed in separate document, <i>Carlsbad Area Office Stakeholder Outreach Implementation Plan</i> .
W-3EM26	EM-26 (1-13-95)	It should not be assumed all state relationships are adversarial. (page 8, goal)	Comment accepted, incorporated page 7.
W-4EM26	EM-26 (1-13-95)	Show how an envoy program will be implemented. (page 9)	Comment will be addressed in separate document, <i>Carlsbad Area Office Stakeholder Outreach Implementation Plan</i> .
W-5EM26	EM-26 (1-13-95)	Should targeting key communities for speakers bureau presentations be tied in more closely with WIPP education programs? (page 9)	Comment noted; will be addressed in <i>Carlsbad Area Office Stakeholder Outreach Implementation Plan</i> .
W-6EM26	EM-26 (1-13-95)	Is there a WIPP site board at the community level. (general)	No board has been established; concept will be reviewed. Referenced, page 12.
W-7EM26	EM-26 (1-13-95)	What decisions are the activities in this plan directed toward; define the issues. (general)	See pages 1, 2, and 5.

No.	Letter from	December 1994 Working Draft Comment	April 1995 Final Draft Resolution
W-8EM26	EM-26 (1-13-95)	Remember groups such as Western Governors' Association, Southern States Energy Board, and Urban Energy and Transportation Corporation for assistance in implementing outreach activities. (general)	Comment accepted, incorporated page 14.
W-9EM26	EM-26 (1-13-95)	Remember Environmental Restoration and Waste Management Information Center. (page 16)	Comment accepted, incorporated page 13.
W-10EM26	EM-26 (1-13-95)	Are funds available to pursue activities described in the plan? (general)	Comment accepted, incorporated page 6.
W-1EM5	EM-5 (1-11-95)	Tie in OIEA Strategic Plan with Disposal Decision Plan. (Background, page 1)	Comment accepted, incorporated page 2.
W-2EM5	EM-5 (1-11-95)	Language too conclusory. (Themes, bullet 2, page 3)	Comment accepted, incorporated page 4.
W-3EM5	EM-5 (1-11-95)	Add "Other state agencies." (Stakeholder Audiences, page 7)	Comment accepted, incorporated page 17.
W-4EM5	EM-5 (1-11-95)	Add separate section on Indian tribes. (Stakeholder audiences, page 7)	Comment accepted, incorporated page 17.
W-5EM5	EM-5 (1-11-95)	Add other state government consortia. (Stakeholder audiences, page 7)	Comment accepted with modification, page 18.

No.	Letter from	December 1994 Working Draft Comment	April 1995 Final Draft Resolution
W-6EM5	EM-5 (1-11-95)	Need separate bullet describing Indian tribal issues. (Situation Analysis, page 4)	Comment accepted, incorporated page 5.
W-7EM5	EM-5 (1-11-95)	Site safety is a concern for those living near waste in temporary storage, especially when waste is near large population areas. (Situation Analysis, page 7)	Comment accepted, incorporated page 6.
W-8EM5	EM-5 (1-11-95)	Suggest additional text: state that detail will be provided in implementation plans; this plan is the beginning of a process. (Goals, page 8)	Comment accepted with modification, incorporated page 6.
W-9EM5	EM-5 (1-11-95)	Suggest additional strategy to work with low-income and minority groups. (Strategy, page 10)	Comment accepted with modification, incorporated page 9.
W-10EM5	EM-5 (1-11-95)	Suggest additional text to emphasize respect for different cultural and religious practices of Indian tribes. (Goal, page 17)	Comment accepted, page 14.
W-11EM5	EM-5 (1-11-95)	Suggest additional text in success indicator reflecting comment W-10EM5 above. (Success Indicator, page 17)	Comment accepted, page 14.