



E n e r g y C o m m u n i t i e s A l l i a n c e P o l i c i e s



Energy Communities Alliance (ECA) is the membership organization of local governments that are adjacent to or impacted by U.S. Department of Energy (DOE) activities. ECA's mission is to bring together local government officials to share information, establish policy positions and advocate community interests in order to effectively address complex constituent, environmental, regulatory, economic development and emergency response issues.

ECA's members are focused on all issues affecting local communities adjacent to DOE facilities including:

- Local Government Role in DOE Decision-Making
- Economic Development and Diversification
- Environmental Remediation and Long-Term Stewardship
- Transportation
- Payments in Lieu of Taxes
- Emergency Response
- Worker Transition, Safety and Health

The policies in this book reflect the concerns of ECA members to the above-stated issues and offer recommendations for ways in which DOE and Congress can work with local governments to address these issues. These policies should be used to facilitate further discussion with DOE, the Environmental Protection Agency, states and local governments throughout the DOE complex in order to develop solutions to our joint areas of concern.

The ECA Board of Directors adopted these policies on March 5, 2004.



TABLE OF CONTENTS

	PAGE
I	Local Government Role in DOE Decision-Making.....1
II	Environmental Remediation and Long-Term Stewardship.....4
III	Economic Diversification and Development.....7
IV	Transportation9
V	Emergency Response13
VI	Payments in Lieu of Taxes (PILT)15
VII	Worker Transition, Safety and Health.....17

I.

LOCAL GOVERNMENT ROLE IN DOE DECISION-MAKING

BACKGROUND

Local governments are responsible for the health and safety of communities affected by past, current or proposed U.S. Department of Energy (DOE) actions and must be consulted on a pre-decisional basis. Early involvement of these elected and appointed officials is critical for establishing trust among communities, regulators, DOE, and other citizens. Such input includes the full range of technical, socio-economic, and risk-based issues that impact the health, safety and welfare of the affected communities.

ISSUES

Local governments are charged with specific legal mandates under state and federal laws, and serve as stewards of public resources and assets. Local governments are responsible for land use planning and control and as such represent the citizens with the primary stake in DOE site decisions. Local governments and DOE must work together to have safe, secure, and compatible land uses surrounding the sites.

Further, local governments support DOE by creating a high quality of life for DOE's employees and their contractors. These entities are responsible for service delivery to support the additional demand due to DOE, even if services are provided pursuant to state law. Local governments provide functions that DOE needs such as the following:

- Police, fire, emergency response, and medical services.
- Utility and transportation infrastructure.
- Land use planning.
- Education, health and social services.
- Political support for DOE activities.
- Repositories for historical artifacts, information, and cultural resources.

Because local officials represent the first line of communication with the citizens and are held accountable to their constituency, DOE should turn first and foremost to local governments for consultation. Public participation should play an important role in DOE decision-making, but public meetings, DOE created advisory boards, and community reuse organizations (CROs) are not a substitute for direct communication and interaction with affected local governments. Local governments should be engaged in decision-making by DOE as official representatives of their communities.

RECOMMENDATIONS

In order to maintain a healthy and productive relationship with local governments, DOE should work to:

1. Create a formal mechanism for working with local governments. The local governments should have a funded seat at the table in discussions of and decisions about the site's federal facilities agreement (FFA) and state oversight agreements. Resources must be available to support the local government's capability to participate in all relevant DOE decision-making. Local governments need to have a substantive role in:
 - a. Emergency response planning and training.
 - b. Homeland Security.
 - c. Cleanup agreements at DOE sites (especially where long-term stewardship/legacy management will be relied upon).
 - d. Land use planning on DOE facilities, especially where DOE is considering "downsizing" the facility/site.
 - e. Transfer of land from DOE for new, nonfederal uses, as well as federal uses pursuant to a Natural Resources Damages Assessment Claim, and conveyance to other state or federal agencies.
 - f. Economic development assistance.
 - g. Payments in Lieu of Taxes for local government support functions; e.g. education.
2. Ease the budgetary burdens on local governments by providing financial assistance to cover public service and infrastructure needs expanded to accommodate DOE missions. DOE is in part dependent on services provided by local governments and places a significant extra burden on those services without paying taxes to support those services. At many sites, local governments have increased their capabilities (utilities and schools are good examples), then have been hit by DOE downsizing that results in overcapacity, which itself is costly to maintain and causes economic disruption.
3. Negotiate with local governments regarding economic transition and reuse of its sites. Local governments are a key driver of economic development, conversion and job replacement for their communities. DOE must consult with local governments regarding its management practices (e.g., workforce assignment, community investment, residency incentives, contracting and procurement) as they affect the community. DOE and its contractors should make a dedicated effort to contract for goods and services in the immediate local community. Some local governments currently have or may assume

legal, administrative or regulatory roles at DOE sites post-closure and post-cleanup. Such institutional relationships should be formally established now so that they will be well-defined at the time the sites are assumed by DOE's Legacy Management organization.

4. Include local government input in the DOE contracting process. The DOE contracts impact communities significantly. Local governments have interests in ensuring that contractors have incentives to become part of the community while accomplishing DOE's missions. Where local governments have participated in this contracting process DOE and the communities have benefited.

II.

ENVIRONMENTAL REMEDIATION AND LONG-TERM STEWARDSHIP

BACKGROUND

The Department of Energy (DOE) relies on long-term stewardship as a critical component of its risk based remediation strategies.

ISSUES

By creating the Office of Legacy Management (LM) and in turn moving the stewardship management responsibilities from Environmental Management (EM) to LM, DOE is moving post-closure stewardship activities to an office that may not be part of the remedy and long-term stewardship tool selection. The possibility that remediation planning and implementation (an EM responsibility) and planning and implementation for long-term stewardship (an LM responsibility) will be bifurcated is real. Thus, ECA is concerned that DOE may not sufficiently meet its cleanup obligations to consider the long-term effectiveness of remedies when selecting remediation options.

The issue is of great importance as contamination will remain at approximately 109 DOE sites at levels that will preclude unrestricted use of land, surface and/or groundwater. With these restrictions come the need to maintain systems that adequately protect human health and the environment for 100 years, 10,000 years and even longer at some sites.

Of particular concern to local governments is the evidence that suggests land use controls, institutional controls and other stewardship measures are not reliable over the long term and not enforceable for the life of the contaminants. The lack of clear roles between DOE, state and federal regulators, and local governments in implementing long-term stewardship remains a significant concern. Similarly, DOE's and Congress' insistence to fund stewardship through annual appropriations raises the specter that sufficient funds will not be provided to properly implement long-term stewardship for the life of the contaminants.

Local governments are charged with the health and safety of their communities and accountable for specific legal mandates under state and federal laws and serve as stewards of public resources such as land and revenue, including land use planning and control. ECA is committed to working with DOE to have a substantive role along with the federal government, agencies and state governments, in long-term stewardship planning and implementation to protect the human health, welfare and the environment in their communities.

Yet while local governments may be relied upon to implement long-term stewardship, these governments are not provided with a substantive role and are not permitted to adequately participate in the formal environmental remediation decision-making

process at DOE sites in, or adjacent to, their communities. DOE's risk-based end-state policy and corresponding implementation guidance relegates local governments to a limited, cursory role.

Finally, DOE still lacks a complete national long-term stewardship policy and implementation plan. DOE must address implementation, enforceability and funding of long-term stewardship before local communities will fully support DOE's reliance on long-term stewardship as part of environmental cleanups.

RECOMMENDATIONS

In order to fully address the requirements of environmental remediation and long-term stewardship, DOE must consider the following issues:

1. **Substantive Role for Local Governments.** Local governments must have a formal role in the remedy decision-making process, especially where they will be relied upon to implement the remedy. In addition, DOE must continue to involve local governments in DOE long-term stewardship decision-making at a national level.
2. **Preference for Permanent Remedies:** Wherever possible, DOE facilities should be cleaned up to a level that allows unrestricted use, avoids long-term stewardship liabilities for the federal government and necessitates minimal long-term stewardship systems to implement.
3. **Planning for Stewardship:** Planning for site disposition and stewardship needs to be more systematic and include the identification and involvement of all parties that may have a role in stewardship activities, including local governments. With the creation of DOE's Office of Legacy Management, this goal will be increasingly difficult to achieve as stewardship planning is split between at least two DOE program offices.
 - a. A national policy on long-term stewardship should be developed within each DOE office that manages real property. The policy should include an outline of the potential roles of various parties, address the limitations of relying upon stewardship as a remedy and identify Office of Environmental Management, National Nuclear Security Agency and Office of Legacy Management roles and responsibilities.
 - b. DOE must recognize the local land use policies and laws to understand the tools available to implement long-term stewardship.
4. **Contingency Planning:** The federal government should take seriously the National Research Council report, *Long-Term Institutional Management of U.S. Department of Energy Legacy Waste Sites*. One key recommendation in that report states that DOE must ensure "planning for uncertainty and fallibility, development of appropriate incentive structures; undertaking necessary

scientific, technical, and social research and development; and planning to maximize follow-through on phased, iterative and adaptive long-term institutional management approaches at sites where contaminants remain.” These contingencies must be included in long-term stewardship planning at both DOE Headquarters and the field level, and such contingency planning must be discussed with local governments and the regulatory agencies.

5. **Funding for Long-Term Stewardship:** Funding sources for stewardship activities must be clearly identified and must be adequate and reliable to ensure that remedies can be effectively implemented for the life of the contaminants. DOE has yet to explain how stewardship funding will be immune from the historic cycles in the federal budget process which could cause a raid on critical stewardship funding.
6. **Implementation of Cleanup:**
 - a. **Environmental Contamination:** To deal with long-term stewardship failures when they occur, the federal government should ensure that local governments are provided detailed characterization and environmental contamination information that is documented, mapped and comprehensive.
 - b. **Technological Advances:** The federal government must implement a systematic process for reevaluating and modifying cleanup end states to ensure that developments in science, technology and other knowledge that becomes available are incorporated into long-term stewardship strategies.
 - c. **Recordkeeping:** The success of long-term stewardship activities requires a record management facility at or near the location of the stewardship activities that is accessible to the community and compatible with the local government’s recordkeeping system. National and local records management facilities that local communities can easily access will be required to maintain duplicate records as failsafe measures.

III.

ECONOMIC DIVERSIFICATION AND DEVELOPMENT

BACKGROUND

Restructuring and downsizing throughout the Department of Energy (DOE) complex has affected numerous communities across the country. To maintain and improve their quality of life, these communities are striving to diversify their economies and become more self-sufficient.

ISSUES

Closures and cutbacks at sites throughout the nuclear weapons complex have resulted in the loss of tens of thousands of DOE contractor personnel jobs since 1992, with significant impacts at some 13 major DOE sites.

To successfully diversify the economy, ECA communities require partnerships with DOE.

RECOMMENDATIONS

Economic development can be sustained only where DOE activities are integrated into the community's strategic planning process. To assure success, ECA recommends that DOE:

1. Restore and fully fund economic development and diversification and worker transition. In particular, ECA believes that economic development must be retained as a condition of DOE's contracts to manage and operate DOE facilities.
2. Make identifying excess real property a priority. DOE and its contractors have had internal difficulties identifying excess or unneeded properties. By making this a priority DOE can accomplish two goals: 1) decrease overhead at its facilities, and 2) assist local communities with creating jobs or accomplishing other reuse goals. DOE should continue to provide these properties to communities at no cost where the community will use the property for economic development and other public purposes.
3. Work with local governments to create infrastructure efficiencies that will benefit DOE and the local community, such as facility and utility infrastructure privatization.
4. Fully indemnify local governments and Community Reuse Organizations (CROs) that acquire property from DOE against environmental liabilities caused by DOE as a matter of policy. Section 3158 of the Defense Authorization Act for Fiscal Year 1998 as amended provides DOE with the

authority to indemnify future owners of its property against liability for contamination left in place by DOE.

5. Focus on long-term reuse and job creation in and around the communities in which the affected workforce resides.
6. Work closely with local governments on Economic Development and Diversification keeping in mind that local governments are the official representative of the community.
7. Create one point of contact for each DOE facility to assist the community through the reuse and transition process.
8. Coordinate its property transfer policies and activities with the U.S. Environmental Protection Agency, Department of Interior and State officials to avoid delays in cleanup and reuse of the properties.
9. Support the preservation of historic assets for public education and heritage tourism across the DOE complex.

IV.

TRANSPORTATION

BACKGROUND

U.S. Department of Energy (DOE) nuclear waste transportation campaigns are large-scale, long-term and require integrated planning for mode and route choices. ECA members are impacted by these radioactive waste shipment campaigns because they are located along shipping routes or serve as points of origin or destination for radioactive wastes.

ISSUES

Many of these large-scale, long-term radioactive waste shipment campaigns raise issues not addressed by current U.S. Department of Transportation (DOT) regulations or by DOE procedures.

1. Issues¹ not addressed by DOT regulations or DOE procedures include:
 - a. The planning process required to identify the least-risk mode-route options.
 - b. The criteria for choice among mode-route options.
 - c. The participation of local governments in mode-route choices.
 - d. The equity between communities at sites from which radioactive waste is removed and those through which and to which it is transferred for disposal.
 - e. The level and types of coordination among DOE sites and headquarters agencies in the assessment process and in implementation.
 - f. The procedures by which DOE should assure that carriers adhere to mode-route choices determined through an integrated mode-route planning process.
2. Issues specific to highly funneled shipment campaigns include:
 - a. ECA communities are local governments. As such, they most directly and legitimately represent the concerns of residents and workers affected by DOE's large-scale, long-term radioactive waste shipment campaigns.

¹ Some, but not all, of these issues were addressed in planning the campaign for shipment of TRU wastes to the Waste Isolation Pilot Plant (WIPP) repository in New Mexico. However, this process was limited by mode of transportation, and its lessons have not been incorporated or extended in the plans for other large-scale radioactive waste shipment campaigns conducted by DOE.

- b. Local governments provide facilities and services (e.g. police, fire, emergency response and medical services) necessary for the protection of health, safety and welfare at and in the vicinity of DOE sites, and along heavily impacted corridors of highly funneled DOE shipment campaigns.
- c. Transport for disposal elsewhere is often needed for cost-effective cleanup and reuse of DOE sites. ECA communities have interests both in the cleanup and reuse of DOE sites and in the safety and equity (procedural, regional, and intergenerational) of the process.

RECOMMENDATIONS

Integrated planning should be conducted to identify the most appropriate mode-route options for large-scale, long-term DOE shipment campaigns. The evaluation of mode-route options should include representatives of local governments as well as state governments, carriers, and DOE operations agencies. Decisions among mode-route options should address both system-wide and equity considerations. DOE should consider the following recommendation before committing to use the mode-route decisions identified in an integrated planning process of high integrity.

1. Integrate planning for large-scale, long-term DOE shipment campaigns. Specific characteristics include the following:
 - a. Identify and assess all feasible mode-route combinations for the campaign. These options should not be limited to currently available transportation facilities.
 - b. Reflect the most reliable available estimates of the volumes requiring shipment, and the most reliable available transportation cost and risk factors.
 - c. Assess accident and radiological risks for each mode-route combination, and should specifically address local risk factors in origin and destination communities, and at key points along the transportation routes under consideration.
 - d. Identify the least-risk mode-route combination systemwide. It should present risk assessment findings on a state-by-state basis system-wide, and on a county-by-county basis in origin and destination states.
 - e. Assess the system-wide cost of each mode-route combination, applying life cycle cost² assessment techniques. Mode-route decisions, however, should be based on safety and equity considerations primarily, and cost considerations secondarily.

² Life cycle costing reflects both construction and operations costs for the entire large-scale, long-term shipment campaign, appropriately discounting future costs. Operations costs may include the costs of local emergency response and medical services along the selected routes. Life cycle costing provides a more valid decision basis than costing which considers annual or operations costs only.

2. Create an evaluation and decision process that is open and participatory. The process should include local governments representing shipment origins, destinations, and heavily impacted corridors. Specific characteristics include the following:
 - a. DOE headquarters should be directly responsible for the integrated planning, evaluation and decision processes conducted for large-scale, long-term shipment campaigns.
 - b. To oversee the planning and decision process for a large-scale, long-term shipment campaign, DOE should establish a Panel comprised of representatives of DOE operations offices, rail and highway carriers, and potentially affected states and local governments. The Panel should meet as a group at key stages of the integrated planning process.
 - c. The Panel should attempt to identify the best mode-route combination(s) for the large-scale, long-term DOE shipment campaign. Its criteria should be specific and should include a) the least-risk combination systemwide, b) equity considerations (particularly regarding the destination state and county, and heavily impacted corridors), c) the life-cycle cost-effectiveness of mode-route combinations, and d) mitigation measures. If more than one large-volume, long-term shipment campaign has the same disposal site destination, the decision criteria identified still apply, but with even greater weight to equity considerations.
 - d. The Panel should function as a decision-making body, and DOE should consider it as such. The Panel should seek consensus in decision-making and should employ innovative techniques to resolve differences among the parties and to identify legitimate and acceptable choices. Only in the event of impasse should DOE identify its own mode-route selection for a large-scale, long-term shipment campaign. Such a decision should be made at the DOE headquarters level, and should be reviewed with the Panel before it is finalized.
 - e. DOE should require use of the selected mode-route option(s) by its carriers, including monitoring of the campaign in process.
 - f. The Panel should be convened periodically to review and assess the implementation of the shipment campaign in process. If major problems are identified, the Panel should have authority to recommend revisiting the integrated planning process.
 - g. Congress should recognize that DOE shipping corridors must contend with unique issues relating to the transportation of nuclear materials and waste and hence should receive additional points in the analysis and scoring for future transportation funds.

3. Work with affected communities to address transportation safety issues by continuing its outreach activities and entering into Memorandum of Understandings (MOUs) with local governments at the origin and end points and along the transportation routes regarding transportation issues. These MOUs must outline the relationships and actions DOE plans to take while transporting radioactive and hazardous materials through an area, as well as what emergency response is required of the local government.

EMERGENCY RESPONSE

BACKGROUND

Coordination is the key factor in the management of emergency situations, ranging from the direct communication between emergency responders in a shared emergency operations center and the ability to communicate on the same radio frequency during an emergency, to the provision of accurate and timely public information. The successful coordination of emergency responders is dependent on integrated planning and organization with clearly defined roles, responsibilities and missions, as well as with shared planning, exercises and drills. Emergency response plans should include the following traits:

- Warning systems that notify the public of potential threats, evacuations, the location of emergency shelters, and medical care in a timely manner.
- Communication systems with layers of redundancies in case of system failures.
- The inclusion of local authorities and first responders in emergency response planning and drills.
- Joint reviews and evaluations of drills and live incidents in order to identify weaknesses and strengths of the existing plan.

ISSUES

The protection of public health and safety is a primary responsibility of local government and emergency response is a basic function of local government. Local governments that host or are adjacent to Department of Energy (DOE) facilities are the primary emergency responders to incidents that threaten the general health and safety of the adjacent population. DOE and its contractors must work with local governments to ensure that emergency response plans minimize impacts to the health and safety of adjacent communities.

RECOMMENDATIONS

1. Use current Federal Emergency Management Agency (FEMA) policies (“Requirements for Fixed Nuclear Facility Emergency Preparedness” NUREG – 0654/FEMA REP-1) as a model for emergency management and response.
2. Combine forces with local governments at their sites to maintain integrated emergency management systems. An integrated approach to emergency management incorporates all available resources for the full range of emergencies, from natural disasters to nuclear attack, and the full range of

issues relating to emergency mitigation, preparedness, response, and recovery.

3. Utilize existing local emergency response organizations. These regional entities should be responsible for on- and off-site issues in the area. The “team” approach would ensure that a joint force of local and federal entities protects the community and DOE workers on the site should an “event” occur.
4. Ensure that local governments along the transportation corridors and in DOE site communities are trained and own sufficient equipment to contend with DOE emergency response issues whether of nuclear or non-nuclear origins.
5. Improve its notification to and coordination of information with local governments and local emergency responders in DOE communities and along transportation corridors. DOE has a responsibility to ensure that local governments receive all necessary information in a timely manner.
6. Coordinate with local governments to create educational programs to inform communities of pertinent facts about the dangers of radioactive and hazardous materials.

VI.

PAYMENTS IN LIEU OF TAXES (PILT)

BACKGROUND

The boom and bust economies at Department of Energy (DOE) sites create a unique burden, making it very difficult for host and nearby communities to attract nongovernmental business and industry. Consequently, many communities are faced with fluctuating economies based on annual congressional appropriations. In addition, the fluctuations cause huge burdens on infrastructure which are borne by the local taxpayers.

When the Cold War ended in the 1990s, these communities which relied heavily on a residential tax base were faced with providing services that far outstripped their tax base. Lack of funds also meant lack of opportunities to replace aging infrastructure, and to recruit new industry. As these communities evaluate the impacts of DOE's presence, the conclusion is that the value of the jobs associated with weapons production and environmental cleanup activities is not enough. The federal government is the only industry that does not support the local tax base, though often the employees rely heavily on local services. That is why it is essential that DOE support local communities through Payments in Lieu of Taxes (PILT), burden payments and use taxes.

ISSUES

The Atomic Energy Act of 1946 authorized, but did not mandate, DOE to make PILT and community burden payments to local governments hosting DOE facilities. While DOE has made discretionary PILT payments to some of its host communities, these communities have had to undertake a long, frequently contentious process of demonstrating how the federal government has impacted the local tax base. Because PILT is paid at the discretion of DOE, it is very difficult for local governments to project revenues that can be applied to local government operations.

Conversely, private-sector jobs tend to provide a more reliable and equitable tax base. At one major site, for example, a comparable private-sector industry in a nearby community paid host local governments an astonishing 90% more in annual taxes than DOE paid in PILT to its host local governments. Similar comparisons can also be drawn across the DOE complex.

Furthermore, DOE uses a self-assessed value for its property. At sites where PILT is currently paid, payments are based on the pre-World War II agricultural classification rather than the property's current use. When DOE conveys excess property, however, the agency seeks payment based on current fair market value. DOE has no uniform policy on PILT payments, allowing the agency wide discretion regarding payments to communities at sites across the weapons production complex.

RECOMMENDATIONS

In order to create a uniform PILT policy across the weapons production complex DOE should:

1. Develop a national policy on PILT with affected local governments.
2. Base the payments on present value of the land and facilities, which is updated regularly.
3. Make payments as long as the land is restricted for use and little or no property taxes are paid. Records of Decision that are based on long-term stewardship should include PILT as part of the cost estimate for the proposed remedy.
4. Transfer the responsibility to make PILT or burden payments if land or facilities are transferred to another federal agency.

VII.

WORKER TRANSITION, SAFETY AND HEALTH

BACKGROUND

In recent years, Department of Energy (DOE) policy changes have caused significant impacts on local communities and workers, especially long-time or career employees. Communities surrounding DOE sites are concerned about the impact on community safety and protection from nuclear-related incidents at the aging DOE sites and the loss of institutional knowledge experienced when workers are replaced and transferred between sites.

The guiding principle of DOE's cleanup and closure actions at its sites throughout the nuclear weapons complex should be to clean up the sites, protect the workers' and the public's health and safety, and provide transition opportunities for host communities to build diversified and sustainable local economies.

ISSUES

1. **Worker Transition:** After the Department's workforce restructuring plan began and DOE developed its privatization contracting initiative in 1996, a major transition occurred as DOE moved from Maintenance and Operation (M&O) to Management and Integration (M&I) contracts. The creation of these new contracts and the associated workforce impacts (i.e., forced retirements, layoffs, and worker transitions) greatly impacted many long-time workers' retirement plans, worker and community morale and economic stability. In some instances, new contracting mechanisms are not delivering the expected results. Media coverage of exposures and other negative public perceptions may also decrease the marketability of displaced DOE workers.
2. **Safety and Health:** The Department has formally recognized, after decades of silence, that current and former workers in the nuclear weapons complex were exposed to hazardous and radioactive materials in their job-related activities. In 2000, Congress passed the Energy Employees Occupational Illness Act that provides for lump-sum payments to current and former workers and their survivors who suffer from a cancer caused by radiation, beryllium disease, or chronic silicosis. ECA applauds DOE for taking the first step in remunerating its workers, contractors, vendors and atomic weapons employers for the many years they were exposed to these harmful elements.

RECOMMENDATIONS

In order to protect the workers' and the public's health and safety and provide transition opportunities for host communities to build diversified and sustainable local economies, DOE should:

1. Work with DOE to require and enforce that retirement benefits promised under an original contract carry through to all subsequent contracts. Protect workers' pensions by including site-to-site-consistent pension requirements in all Requests for Proposals.
2. Increase funding of the Worker Transition Program (Section 3161 of the National Defense Authorization Act of 1993) and expand the program to assist both workers and communities.
3. Support DOE-independent ombudsman programs to help workers experiencing retribution.
4. Protect skilled worker positions to assure continued safe handling of the many hazardous materials at the sites.
5. Successfully implement and maintain, along with the Department of Labor, the Energy Employees Occupational Illness Compensation Act of 2000.
6. Contractually guarantee long-term monitoring of former and current workers who have experienced hazardous exposure.