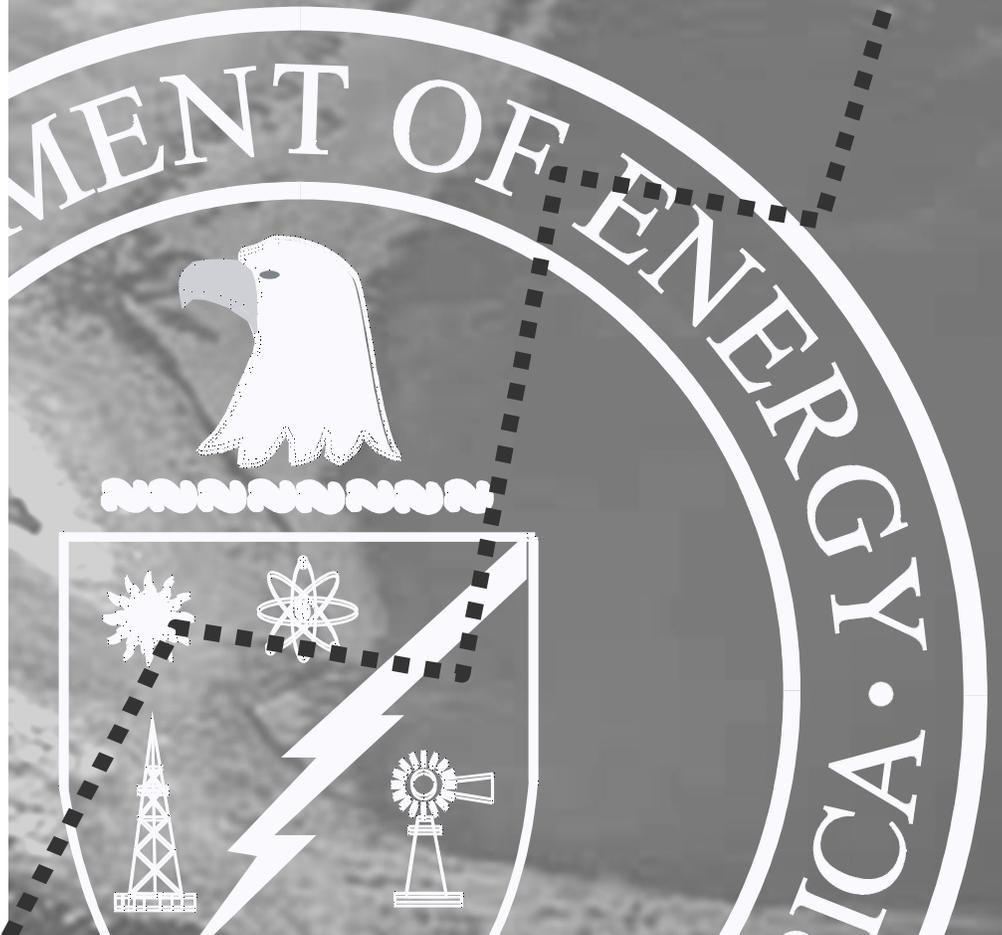


U.S. Department of Energy

Office of Management, Budget and Evaluation

Communications and
Stakeholder Participation



Initiated by: Office of Engineering and Construction Management

COMMUNICATIONS AND STAKEHOLDER PARTICIPATION

Frequent, consistent, accurate, and informative communications are key responsibilities of a project director (PD) throughout the life cycle of a project. Internal communications can be informal (undocumented) or formal (documented) depending upon the circumstances, the information being communicated, and the entities involved. External communications however, because they usually involve entities not directly involved in a project, are generally formal (documented) to assure all interested entities obtain the same information at approximately the same time and have the same understanding. External entities include the media, stakeholders, tribal nations, citizen's boards, and certain Governmental agencies. External communications are intended to inform interested parties of the project's mission, goals, objections, deliverables, status, and performance; and are particularly important in informing interested parties of the project's success in protecting and safeguarding the workers, the public, and the environment. This Practice provides guidance related to external communications including planning, documenting, and implementing. Several sample communications plans are also provided.

1.0 OVERVIEW

The goal of a public participation plan is to align project and public interests so that, when possible, project decisions reflect community concerns. To ensure the proper level of public participation, planning should begin early (during the project's Initiation phase) so that public participation can be integrated with the project's decision-making process throughout the project's life cycle.

To ensure consistency and the most efficient use of public participation resources, the PD coordinates all public participation activities through the DOE Headquarters Office of Public Affairs or its counterpart in the field. The Public Affairs staff is experienced in communicating effectively with the public and can help the PD use existing public participation mechanisms to gain public input. Such coordination may include consulting with other PDs involved in ongoing public participation activities (e.g., public participation coordinators for Environmental Management projects). The guidance provided in this Practice explains how public participation should function within the project; however, the PD should rely on Public Affairs to direct the effort.

In implementing the guidance contained in this Practice, the PD should understand and enact the intent of DOE Policy 1210.1, "Public Participation," which describes the Department's goals and core values for enlisting public input on project decisions.

A communications/public participation plan(s) may be tailored to a site or to a specific project. A site-integrated plan should cover all project activities at a site. Small and medium-sized projects may be incorporated into the site-integrated plan; however, a large project (as defined by cost, complexity, controversy, impact, or duration) may require its own communications/stakeholder participation plan(s). This guidance both lists and explains the minimum components recommended for an effective project-specific communications/stakeholder participation plan(s), but the principles could be applied to a site-integrated plan as well.

Various communications and stakeholder participation requirements are imposed by the following laws, which should be reviewed by the PD, in conjunction with Public Affairs and Legal, to determine their applicability and possible impact:

- Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) as revised by the Superfund Amendments and Reauthorization Act (SARA)
- Resource Conservation and Recovery Act (RCRA)
- National Environmental Policy Act (NEPA).

2.0 PRINCIPLES AND PROCESSES

In the past, many DOE public participation programs relied on one-way communication. Officials used presentations, brochures, press releases, and other public information tools to prepare the Department's side of the story without inviting public comment. Much of this approach was driven by (and a product of) the urgency and secrecy surrounding early Atomic Energy Commission programs and projects. This, however, is no longer the case, and such urgency and secrecy are no longer acceptable to the public.

Besides being required in many cases by law, citizens often demand a voice in how (and sometimes if) a project will be carried out. When stakeholders do not have the opportunity to participate and voice their opinions, they are more likely to resist and oppose a project, which can present a serious obstacle to a project's success. A second, and perhaps even more serious obstacle to success, is for the public to be allowed to voice their opinions, but then realize their opinions are not being considered in the decision process. However, when the public is allowed to participate in and affect the decision-making process, they are more likely to accept the outcome. In addition, they may be able to identify and share information that increases the likelihood of project success.

Over the course of a project, public attention and interest in the project can change in focus and intensity. Therefore, the project should establish communications channels through activities that provide the greatest flexibility in reaching audiences and avoid the tendency to continually create new channels and activities or significantly modify existing channels and activities. Communications plans and programs should be based on the project's goals and the need or desire for segments of the public to be involved. Communications tools or activities that, once established, can be used to efficiently and effectively address changing messages, issues, and

audiences, provide the best opportunity to conduct clear, accurate, and meaningful communications in a cost-efficient manner.

3.0 THE PUBLIC'S ROLE IN DECISION-MAKING

Interest in community issues varies widely. Some individuals or groups are intensely interested and will devote considerable time and energy to learning about issues and participating in decisions. Others participate occasionally, while some do not participate at all. The same is true for various regions of the nation—some are interested and involved, some are not.

Effective public participation should be tailored so that individuals can participate at their level of interest whether it be intense or minimal, long-term or transitory. Accordingly, public participation plans should provide a variety of opportunities for participation. For the most active members of the public, such activities can include citizen's boards, public meetings and hearings, and one-on-one meetings with project representatives or Public Affairs personnel. Less active individuals might better be reached through news releases, news conferences, community newsletters, and direct mailings. Such opportunities are discussed in Section 6.6, Communications and Stakeholder Participation Tool Box. The successful PD will recognize these differences in interest and tailor the project's communications program to accommodate them.

When overall public interest in project decisions is high, or the project is controversial, PDs should be especially aware of keeping the public informed about the project, including opportunities for participation throughout the decision-making process. In these cases, the PD should take whatever actions are necessary to convince the public that their input is both desirable and useful.

Effective communications and stakeholder participation is especially important when a project is likely to be controversial. Public participation programs provide excellent insight into issues that generate public concern. Examples of such issues include:

- Release of contaminants to the environment
- Handling, packaging, transporting of hazardous materials or materials the public perceives to be hazardous
- Public and worker safety and health
- Future use of a facility, including long-term stewardship
- Cleanup progress
- Possible residual effects on individuals or the community
- Budgets and costs
- Increasing/decreasing employment opportunities.

These issues always raise public interest or concern and should be addressed accordingly. Any project with implications concerning safety and health, the use of tax dollars, reduction in the number of jobs, reduction in the value of real estate—any marked change in the status quo—is likely to generate public concern, thus making an effective communications and stakeholder participation program necessary. Failure to thoroughly address public concerns in a timely, accurate, and honest manner may result in a public relations fiasco from which a project may never recover. The following elements should be considered in evaluating the amount of controversy associated with a project:

- Do advocacy groups already exist for particular outcomes, either within a site or among stakeholders? Advocates, whether internal or external, are likely to generate controversy in an effort to ensure their preferred outcome prevails. In such instances, a forum should be provided so that these individuals, and others with different opinions, can debate their ideas in an effort to resolve the issues.
- Is the decision primarily technical, or does it require one public concern to be weighed against another? Decisions that are primarily technical usually require minimal public involvement. Decisions that require choices between public concerns are more likely to generate interest and controversy.
- Are managers making informed judgments about appropriate levels of activity by consulting Public Affairs, other managers who have conducted similar communications and stakeholder participation programs, and major stakeholders who can provide insight into the level of public interest?

Whatever else a PD does, they should strive to avoid the development and use of informal communication channels between employees and the public. These communications channels can cause serious problems for the project by providing stakeholders with inaccurate and incomplete information. In addition, once developed, these channels are difficult to eliminate and impossible to control. Timely information is perhaps the best method of avoiding this situation.

4.0 COMMUNICATIONS STAFF

Although dynamic communications and stakeholder participation programs add to the duties of PDs, the site's communications staff could assume most of this effort. To accomplish this, during the Initiation phase, the PD should request that a communications staff member be assigned to the project. This individual, whose job is to translate technical ideas into public information, works with the PD to develop communications plans (Attachment 1, Sample Site Communications Plan, and Attachment 2, A Task or Activity Specific Communication Plan). This individual should also develop and maintain project-specific summaries of community concerns, based on the ongoing communications and stakeholder participation process (Attachment 3, A Site Citizens Board Participation Plan). Communications personnel also help

ensure the timely dissemination of factual information to Federal, state, and local officials; key stakeholders; educators; the media; special interest groups; and the public.

General communications services include:

- Development and management of media relations
- Development of written materials (fact sheets, newsletters, etc.) that provide technical, engineering, or environmental information for the public
- Development and maintenance of web sites
- Graphic design, video production, and photography services
- Review of technical documents to identify potential community concerns, and develop appropriate situation-specific “action plans” and responses
- Public opinion research
- Employee communications
- Emergency public information releases
- Community outreach programs
- Training project personnel in public speaking and media communication.

5.0 COMMUNICATIONS AND STAKEHOLDER PARTICIPATION PLAN

Timing is essential to the successful integration of public participation with the project’s decision-making process. If the public does not have the opportunity to provide early input, their information may be received too late to be used effectively, leading them to believe that their interests have been ignored. On the other hand, if they are asked for input too early, before the project and related decisions are adequately defined, the public may feel their input is meaningless. In both situations, the DOE may lose credibility. For these reasons, an appropriate communications and stakeholder participation plan should be planned, prepared, and implemented early in the project. The plan should be updated as necessary, but at least annually to reflect changes in the project and the decision process, and public input.

A communication/participation plan should define project goals for public participation and may include information concerning compliance with laws and regulations. The National Environmental Policy Act, for example, requires that procedures be developed to ensure the “fullest practicable provision of timely public information and the understanding of Federal plans and programs with environmental impact to obtain the views of interested parties.” Additional goals include responding to specific community issues, such as land use and health concerns. By establishing appropriate goals, the PD can seek to reduce or eliminate costly confrontations and delays caused by public objections. To meet such goals, the communication/stakeholder participation plan should identify the level of public involvement needed, the specific interest groups that should be consulted, and the appropriate time frame.

However, those preparing and implementing the plan should diligently strive to assure no person is intentionally or unintentionally excluded from participation in the public process.

The decision-making process for a particular project or project activity may be simple or complex, but the basic steps of public involvement remain the same. These steps should be used to develop a communication and stakeholder participation plan:

- Conduct a community assessment
- Consult the public
- Identify potential alternatives to address public concerns
- Inform stakeholders of the alternatives being considered
- Evaluate and refine the alternatives
- Present the alternatives to the public
- Make a decision
- Evaluate progress continuously and revise the plan accordingly.

If communication and project personnel work closely with local citizens groups, they may find much of this information already exists, as shown in Attachment 3.

5.1 Conduct Community Assessment

A community assessment, prepared by communications personnel, should identify public issues most likely to affect the success of the project, and the stakeholder groups most likely to participate in or object to the decision-making process.

A community assessment, described below, is an invaluable resource to the project. In addition to discussing the structure of the community, the profile may describe:

- How the community has reacted in the past
- What citizen actions have been taken
- How DOE's approach to communications and stakeholder participation has changed over the years
- How the community views the risks posed by the project, focusing on the perceptions of past events and problems
- Which individuals and groups are most interested in the project.

Identify Stakeholders

The term stakeholder refers to individuals who are interested in a project decision due to their proximity; economic interest; use of mandate or authority; or their vulnerability to environmental, socioeconomic, or cultural impacts.

Stakeholders may be part of one or more of the following groups:

- U.S. EPA
- U.S. DOT
- Native American Tribal Governments
- State Governments
- Local Governments
- Elected officials
- Environmental groups
- Industry and professional organizations
- Labor organizations
- Education groups
- Citizens groups
- Community members.

Communication/stakeholder plans should identify which stakeholders are most likely to be interested in project decisions and will commit time and resources to participate in meetings and decisions. The plan, if possible, should link specific stakeholders and groups with specific technical issues, objectives, and/or other significant features of the project. This information can be used to plan for the participation of those individuals and groups— including the timing of their participation, and the size, type, and cost of activities related to their participation.

Identify Issues Likely to Affect the Public

To obtain the participation of major stakeholders, issues should be identified at a level that does not automatically rule out the options those stakeholders believe should be considered. For that reason, the first step in preparing the communication/stakeholder participation plan may include consulting with a Citizens Advisory Board to obtain an initial list of public concerns. Communications personnel can be instrumental in the success of this effort in providing valuable information, including public opinion research and community profiles.

If the PD chooses not to consult with opinion leaders, the project team (including communications personnel) would have to develop alternatives by starting with known technical approaches and combining them in various ways. The project team could probably decide on one alternative, but working in isolation from the public, the team would be likely to prejudice major value issues in favor of technical solutions, and perhaps failing to account for public concerns. When the team interfaces with various stakeholders, however, it is more likely to consider a broader range of alternatives. In fact, the range of choices may be too broad to allow a detailed technical evaluation of each alternative. However, stakeholders are more likely to support the process if they can see that the alternatives considered reflect their concerns.

Typical public issues may include long-term safety, short-term risks, on-site disposal and disposal requirements, impacts on natural resources, transportation and off-site disposal requirements, economic impacts and benefits, costs, and schedules.

5.2 Consult the Public

The communications/stakeholder participation plan should recognize that once the issues are identified and various alternatives are under consideration, the PD, in concert with communications personnel, should publicly announce the various options and seek comments. Depending on the level of public interest, the best avenue for this discussion may be a Citizens Task Force, a public meeting or hearing, an announcement in a newsletter, or individual mailings with an invitation for comment. At this time, the public may suggest additional alternatives or ways to modify existing alternatives to make them more acceptable. The public may also provide reasons for rejecting certain alternatives. This step may more fully define existing alternatives or identify additional alternatives.

Project and communications personnel should make every effort not to leave any stakeholder with the opinion that their input has not been fully considered, or that they are being ignored. Such a mistake can result in serious and often long-term consequences: open and organized opposition, legal action, delays, and cost and schedule impacts.

5.3 Identify Potential Alternatives that Deal with Public Concerns

To maintain credibility and ensure selection of the best alternative among a range of alternatives, the evaluation process should be objective, taking into consideration the technical and economic feasibility of alternatives while describing the social, economic, and environmental impacts that would result from each. Impacts should be described so that they are technically verifiable.

Because the number of alternatives may be too great to allow a detailed evaluation of each, an initial evaluation may necessarily be “rough cut.” In performing a rough-cut evaluation, the project team may determine that some alternatives are not technically feasible, have too many unacceptable impacts, or are unacceptable to the public. Accordingly, unacceptable alternatives are eliminated and the possibilities reduced to a number that can be reasonably studied and evaluated in greater detail.

Determining which alternative is best is not always easy for the public, or even the decision makers. The best alternative for one group may not be the best for another. Cost may be the PD’s primary consideration, for example, while jobs may be the public’s primary concern. When the PD is faced with such choices, public participation is especially important in determining the range of acceptable choices, even though the choice selected may not please everyone.

5.4 Inform Stakeholders of the Alternatives Being Considered

The PD should use available public information tools to inform stakeholders and the public of the alternatives being considered, as well as the criteria being used to differentiate among alternatives, and retain those most promising. The public can offer additional input to help the project team further evaluate and refine alternatives.

5.5 Evaluate and Refine Alternatives

Most effective decision-making processes include several iterations. Each time, some alternatives are eliminated and some are added. With each iteration, the alternatives are defined to a greater level of detail in an effort to identify and select the alternative that best suits the technical, cost, and schedule needs of the project, while recognizing the public's values.

In evaluating alternatives, the project team and communications personnel should answer the following questions:

- What evaluation methodology should be used?
- Are alternatives consistent with stakeholder concerns?
- Can alternatives be modified or combined to better accommodate the various factors affecting the decision?
- Is more information needed to make the decision?
- If a public concern changed for some reason, would the selection of alternatives be affected?
- Is more than one course of action acceptable if the situation changes or if new information makes the first choice unacceptable?

5.6 Present Alternatives to the Public

The participation plan should provide for a public forum to discuss the alternatives. If uncertainties about the alternatives still exist, they should be honestly presented with some estimate of the time required for resolution. At this point, the schedule should allow for further changes.

5.7 Make the Decision

In the end, the PD is responsible for the final decision. Obviously, public participation cannot dictate the decision; even the best public participation programs involve only a small percentage of the public. However, when stakeholders care enough to participate in the decision-making process, their participation should mean something or they will be more upset than if they had not been asked to participate. For that reason, the PD and the project team should work to ensure that the public understands how their concerns were considered. A public forum should be provided to announce the final decision, along with a clear explanation

of the process and the criteria used to make the decision, and the impact of the decision on stakeholder interests.

5.8 Evaluate Progress and Review the Plan

Throughout the project, the project team should evaluate decisions as described, and re-evaluate prior decisions, so that they recognize and take advantage of any opportunity to accommodate the public.

The evaluation process can be difficult. For one thing, many of the benefits of a communication/stakeholder participation plan are intangible and therefore subjective and difficult to measure. For another, the benefits of one public participation activity depend to some extent on the success of other related public participation activities, and the credibility established by one group or during one activity may affect another.

6.0 COMMUNICATIONS AND STAKEHOLDER PARTICIPATION TOOL BOX

Several resources are available to project and communication personnel to assist them in effectively communicating with the public.

6.1 Public Meetings and Formal Public Hearings

Public meetings provide an opportunity for two-way exchange between the public and the DOE. Public meetings can include a panel of DOE or independent speakers, informal discussions with speakers, exhibits, and a question-and-answer period. Public meetings can also include smaller sessions with technical personnel. Providing video/satellite conferencing for those unable to travel to the meeting, and holding evening or weekend meetings are ways to encourage participation in public meetings.

As opposed to public meetings, public hearings follow a more prescribed format and are usually held to fulfill the requirements of laws, regulations, or legal agreements, and may be convened by the DOE or a regulating agency (EPA, etc.). Hearings provide a formal record of public comments on a specific regulatory document or permit application.

Public meetings and public hearings are visible and, for that reason, potentially problematic. Depending upon the issue and the public's level of interest, the meeting may be well attended by both the public and the media. If the project is controversial, the meeting may be volatile. For these reasons, site communications personnel should plan and direct the meeting to help anticipate problems and plan solutions, including innovative approaches to enhance the exchange of information, and to avoid the perception that the project is unduly influencing the process.

Regularly scheduled public meetings provide for ongoing public involvement and discussions of a wide range of topics. Over time, monthly or quarterly meetings foster development of

mutual respect and understanding while expanding the information base of both the public and the project.

6.2 Citizen Groups

Citizen groups include a variety of participation possibilities, such as roundtable discussion groups, work or technical review committees, or Citizen Advisory Groups. Such groups can be established for a specific project, or the PD can work with groups that are already established. Such groups are regulated by the Federal Advisory Committee Act (FACA, Public Law 92-468), and the PD should be familiar with and ensure compliance with this act.

The single most important component for the success of citizen groups is a sincere commitment by the DOE and its contractors to seriously consider the group's recommendations. Citizen groups can provide independent recommendations on key project decisions, and all levels of management should be willing to work directly with a Citizen Advisory Group and its constituents. Managers who do not understand the significance of public participation should receive additional training to prepare them for the process. Credibility and trust is most often lost at the working level by managers or engineers who (advertently or inadvertently) send messages that public input is not important or desired.

A Citizen Advisory Group provides valuable public participation that may increase public understanding and acceptance of the issues while providing the DOE decision-makers with insight. Such a group can help the PD focus on issues that may require significant local involvement, but may be lost in the project decision-making process. A Citizen Advisory Group also provides ready access to a knowledgeable group of stakeholders who can act as a sounding board for important and sensitive issues. Finally, a Citizen Advisory Group can effectively disseminate information to the public.

Members of citizen groups should understand that they represent the demographics and socioeconomic conditions surrounding the facility. Members should be encouraged to recognize and understand the groups most likely to identify with them and work to ensure those groups are informed of and involved in group activities.

Although a Citizen Advisory Group can represent a full range of public concerns, it cannot possibly represent everyone. A Citizen Advisory Group is not the only stakeholder group that the DOE listens to, and the group does not replace any part of a public participation program. Rather, it enhances the effectiveness of direct public involvement in decision-making (see Attachment 3 for a sample Site Advisory Board Participation Plan).

6.3 Prompt, Factual, Accurate Responses to Inquiries

Whenever members of the public or news media have questions or express concerns regarding project developments, events, cleanup plans, or progress, they present the DOE with an excellent opportunity to increase the public's understanding and gain favorable perception of

the project. The PD should plan in advance for such inquiries, working with communications personnel and preparing the technical staff to respond quickly, preferably within 24 hours.

6.4 Printed Materials

Printed material includes newsletters, fact sheets, and community and employee publications that provide new information, and updates on key project activities, events, and decisions. These materials also promote public involvement.

6.5 Additional Public Information Tools

A number of other public information tools are available to the PD, including:

- Web sites
- Exhibits at public events
- Speakers bureau to disseminate information to community organizations
- Open houses and tours
- Mailings to stakeholders and other community members notifying them of public comment periods or the availability of documents
- Videotapes to provide information on project activities and accomplishments
- Public reading rooms
- Educational activities such as mentoring, internship, and school-to-work programs.

7.0 MEASURING FOR RESULTS

During the course of the decision-making process, the PD may want to quantify comments as a means of evaluating alternatives. Such an analysis may provide useful information in determining prevailing public concerns, but it should not take the place of a sustained public outreach.

At appropriate intervals, depending on the size of the project and the level of public interest, the PD needs to evaluate their public participation program. Local colleges or universities may be helpful in gathering community opinions and information. Up-front relationships need to be established with these groups, however, before they are enlisted to support a project in such an effort.

ATTACHMENT 1

SAMPLE COMMUNICATIONS PLAN

West Valley Demonstration Project Stakeholder Communications Plan for FY2000

GOAL

WVDP's goal is to achieve its waste and environmental management objectives as established in the West Valley Demonstration Project Act (Public Law 96-368), in accordance with agreements with involved agencies and organizations. As a responsible member of the local community this requires the WVDP to:

- Provide current, accurate Project information to the public and, specifically, to interested stakeholders
- Respond to stakeholder requests
- Solicit, collect, and consider stakeholder input as part of decision-making.

WVDP COMMUNICATIONS APPROACH

WVDP communications is based on meeting the needs of the many individuals and organizations that are interested Project stakeholders. Communications planning is focused on developing and maintaining channels of communication throughout the community, through which information can be disseminated, input can be received, and responses to requests can be provided.

Communications activities are conducted:

- On a proactive basis to provide information and/or solicit input and involvement
- In response to stakeholder requests.

Whether proactive or responsive, communications must meet stakeholders' needs in terms of content and timing.

RESPONSIBILITIES

The success of the WVDP communications program depends on the integrated participation of personnel from the Department of Energy, the New York State Energy Research and

Development Authority (NYSERDA) project offices, and West Valley Nuclear Services Co. (WVNS).

The organizations' responsibilities are:

- West Valley Nuclear Services

The WVNS Public & Employee Communications Department is responsible for planning, organizing, conducting, and evaluating the WVDP's communications activities.

WVNS technical and administrative personnel are responsible for providing the support needed to conduct the planned activities.

- Department of Energy

Project office staff are responsible for working with involved stakeholders to achieve the Department's WVDP goals.

- New York State Energy Research and Development Authority

The NYSERDA owns the Western New York Nuclear Service Center where the WVDP is located. Authority personnel are responsible for conducting stakeholder communications regarding certain current and long-term Center management issues for which the NYSERDA is responsible.

COMMUNICATIONS FOCUS FOR 2000

Communications initiatives in FY2000 will continue to focus on providing information to stakeholders on near-term and long-term work and related WVDP completion issues, and will continue to encourage stakeholder involvement and open discussion.

Key work scopes that will be discussed include:

- Remote cleaning of the high-level waste tanks
- Development of a draft preferred alternative for WVDP completion and long-term site management
- Decontamination and decommissioning of portions of the former spent fuel reprocessing plant
- Low-level waste shipping for disposal
- Preparations for shipment of spent nuclear fuel
- Design and construction of the Remote-Handled Waste Facility.

PLANNED COMMUNICATIONS ACTIVITIES FOR 2000

Historically, stakeholder surveys have proven to be valuable communications tools. Based on the input from the stakeholder survey conducted in 1998, and after consideration of past

effectiveness, flexibility, and cost of the various activities, the following primary activities are planned for FY2000:

Stakeholder Survey

Following on the successful results obtained from the 1998 stakeholder survey, we plan to conduct another survey to evaluate the effectiveness of the changes in communications activities.

Required by—Best Management Practice.

Stakeholder involvement—Members of the local community, schools, elected officials, businesses, participants from the Citizen Task Force and the West Valley Coalition on Nuclear Wastes, the Seneca Nation, and regulatory points of contact.

Participation—38 stakeholders.

Value/Justification—Obtaining direct knowledge of stakeholders' level of understanding of site activities and communications is vitally important to the successful execution of Project objectives. Feedback regarding Project activities and mission makes it possible to identify areas for improvement and initiate specific corrective actions.

Quarterly Public Meetings

Meetings are held at the Ashford Office Complex in Ashford, N.Y., from 6:30 p.m. to 9 p.m. and are tentatively scheduled for:

December 7, 1999 June 20, 2000

March 21, 2000 September 19, 2000

Required by—1987 Stipulation of Compromise Settlement (Civil No. 86-1052-C) between the Department of Energy and the Coalition on West Valley Nuclear Wastes.

Stakeholder involvement—Open to the general public. Representatives of the Coalition on West Valley Nuclear Wastes, Town of Ashford Board, local media and interested area residents routinely attend.

Attendance—15 to 35 people.

Public Notification—Personal postcards announcing each meeting are sent to regular attendees and key community representatives. Public notices in local newspapers, Penny Savers, WVDP employee newsletter.

Value/Justification—Initiated in 1987, the meetings are open forums to address changing issues and provide routine updates on Project progress. Minimal cost and ongoing attendance by local officials and interested residents make the meetings an excellent means of involving stakeholders.

Citizen Task Force

In January 1997, NYSERDA, with the support of the DOE, convened a Citizen Task Force (CTF) to provide recommendations regarding completion of the WVDP by DOE, and closure and/or long-term management of the site by NYSERDA.

The CTF is comprised of 16 Western New York residents invited to take part based on their involvement in a wide range of area organizations and groups. CTF members are associated with environmental and civic groups, educational organizations, and business organizations, in addition to representing elected offices and the Seneca Nation of Indians.

Twice monthly meetings were held through July 1998. At the July 29, 1998 meeting the CTF completed their recommendations report on WVDP completion and site closure and/or long-term management, and submitted it to DOE and NYSERDA. The CTF continues to meet to receive updates on EIS-related activities on an as-needed basis.

Required by—Best Management Practice.

Stakeholder involvement—Task Force members, general public, media.

Attendance—10 to 20 people.

Public notification—Pre-meeting mailings are sent to all Task Force members and interested stakeholders that have asked to receive them. Because meetings are scheduled on an as-requested basis, public notices are placed in the local paper. Meetings are frequently covered by the local Springville, NY weekly newspaper.

Value/Justification—The CTF was formed following evaluation of public comments received on the Draft Environmental Impact Statement. Numerous stakeholders commented on the complexity of the issues and the subsequent challenge in comparing alternatives. The CTF is one means of helping local stakeholders better understand the study and the issues involved. The recommendations report that has been submitted not only identifies key issues of community concern, but also provides a basis for discussions between involved stakeholders and the WVDP as a preferred alternative that will be developed over the coming year.

Spent Nuclear Fuel Shipping

In the coming year, considerable effort will be spent developing a plan for communications activities associated with shipping the 125 remaining spent fuel assemblies to the Idaho National Engineering and Environmental Laboratory in 2001. In addition to the development of the Communications Plan, meetings with state points-of-contact along the transportation corridor will be initiated, outlining both the shipping project and communications activities.

Open House

Although the date and format have not been identified, Open House 2000 will continue to focus on tours and informational materials that allow visitors to view the WVDP facilities first-hand. Emphasis remains on interim projects that will bridge activities in anticipation of a preferred alternative and decisions about long-term site management.

Required by—Best Management Practice.

Stakeholder involvement—General public, Western New York schools, employees' families/friends/associates, interested/involved stakeholders and media.

Attendance—Over the history of the WVDP attendance has ranged from approximately 600 visitors to 1,800 visitors.

Public notification—Press release, posters, bulk mailing to local residents (4,500), advertisements in western New York newspapers/penny savers, special mailing to interested stakeholders outside the local area.

Value/Justification—Public and media responses have been overwhelmingly positive throughout the years. Results from the stakeholder survey conducted in 1998 showed that Open House is an activity that appeals to a wide range of people and which participants feel is very informative.

In addition, media coverage of the event provides the opportunity to disseminate information to the general public, thus reaching many people in addition to Open House visitors.

Local Chambers of Commerce

Public and Employee Communications staff attend monthly meetings of the West Valley and Springville Chambers of Commerce to share information with local business leaders on Project and community activities and issues. As appropriate, the Project participates in community related functions of the chambers.

Required by—Best Management Practice.

Stakeholder involvement—Local business owners, site neighbors, elected officials, members of key community organizations.

Attendance—25 to 30 people.

Value/Justification—Monthly meetings are informal and provide opportunity for open dialogue. Featured topics cover the range of local issues and activities providing valuable information to the WVDP on community concerns, as well as providing area leaders routine access to WVDP information. Contacts with many local residents are developed, establishing channels for future communications.

Public Reading Files

The Public & Employee Communications Department maintains files of key WVDP documents in five locations (four area libraries and at a WVDP facility) to provide the public with open access to information.

Required by—DOE and regulatory guidance.

Stakeholder involvement—Three public reading files are located within 10 miles of the WVDP to meet the needs of residents in the local area. The other two reading files are in the major population centers north (Buffalo, N.Y.) and south (Olean, N.Y.) of the WVDP.

Value/Justification—Document files maintained in public libraries are a very inexpensive means of assuring basic WVDP information is available to the general public.

Educational Programs

Maximizing WVDP value to the local community has always been a Project goal. The establishment of an educational partnership between the WVDP and area schools is an example of this approach in action.

Two programs that will continue in the 1999-2000 school year are the Educational Horizons Work/Study Program and the Mentoring Program.

The Horizons Program was developed to take advantage of the wide range of technical and administrative disciplines at the WVDP to help students in their senior year make career choices and encourage them to further their education after high school.

Involved students work at the WVDP in situations which match their career interests. The work assignments are integrated into the students' school schedules, with most students at the Project for about eight hours each week. Through the WVDP/West Valley Central School partnership, additional private businesses are now taking part and will provide assignments for two students this year.

The Mentoring Program was begun in the 1994-95 school year and brings adult mentors into the school to meet and work with junior and senior high students on a weekly basis.

Students offered the chance to take part are selected by school staff based on the potential value of additional support and assistance to their success in school. They meet once a week in school with their adult mentor.

In the 1999-2000 school year, the mentoring program will be offered at Springville Middle School as well as Saint Aloysius in Springville and West Valley Central School. The WVDP will continue, in cooperation with the West Valley Central School Partnering Committee, to focus on soliciting the involvement of other area businesses to provide more opportunities for students.

Required by—Best Management Practice.

Stakeholder involvement—Three students are enrolled in the Horizons Program and 27 employees are participating in the Mentoring Program for the 1999-2000 school year.

Value/Justification—The programs provide opportunities in a rural area that would not be available to local students without the WVDP's participation. At a very minimal cost, students benefit through enhancement of their education, and WVDP employees expand their perspective on the importance of the WVDP to the community and develop their interpersonal skills.

ROUTINE COMMUNICATIONS FUNCTIONS

The following activities are conducted to respond to public requests. The WVDP Public & Employee Communications Department will continue to fulfill these responsibilities.

- Responses to Public and Media Information Requests
— More than 200 annually
- Site Tours and Briefings
— 30 to 60 annually
- Off-site Presentations for Educational and Community Organizations

WVDP Stakeholders

- Citizen Task Force (CTF)
- Coalition on West Valley Nuclear Wastes (CWVNW)
- Seneca Nation of Indians
- Government: New York State, Cattaraugus and Erie County, Towns of Ashford and Concord
- Regulatory agencies: NRC, EPA Region II, NYS Department of Environmental Conservation, NYS Department of Health
- Regional residents
- Local media
- National media—spent fuel shipping campaign
- Employees

Current Public Affairs Environment

Many of the public outreach activities performed over the last year have maintained, and in a number of areas improved, relations with members of the local community. The Project continues to provide support to the community through educational programs, participation in local chambers of commerce, and various information sharing activities. In the Western New York region, the Project is currently experiencing a period of strong public acceptance.

Analysis

During the first ten years of the Project there was interest throughout the Western New York community in the WVDP. Initially there was general fear of the site due to misconceptions that had developed over nearly two decades of a “closed door” policy. After the WVDP “opened the doors” and alleviated many public fears, stakeholders focused on the real issue of safely solidifying the very radioactive liquid high-level waste. By 1993-94, the vitrification system had been developed, thoroughly tested, and, as final preparations for vitrification operations proceeded, public concern and attention became somewhat dormant.

By the time actual processing began in 1996, there were no public concerns voiced and it was very difficult to garner media coverage in Western New York after the initial startup of the facility. The West Valley site had faded from public awareness.

This general public calm and acceptance can be deceptive. When the public and the media are presented the plan for completing the WVDP and managing the site for the long-term, the West Valley “story” will be “new” again. The issues of long-term environmental dangers, regional equity, institutional controls, and state versus federal responsibilities all are issues that can incite negative public reactions and can become social obstacles to completing Project activities.

For example, when DOE began planning cleanup at the Tonawanda FUSRAP site, DOE held public meetings to discuss proposed alternatives. When DOE announced that the preferred alternative was to perform partial excavation and dispose of the material onsite, the public was not satisfied. Due to strong public objections, the preferred alternative was changed to partial excavation and off-site disposal. Significant delays resulted.

We have identified this potential and have increased outreach activities to include a larger audience to prevent this kind of negative result. Following is a list of activities that were targeted in fiscal year 1999.

- Stakeholder Survey

The WVDP has always worked to provide opportunities for open communications all interested stakeholders. The stakeholder survey was conducted to collect feedback from individuals that have actively participated in communications programs. Questions were developed to gather stakeholders’ input on the following specific topics: WVDP mission performance, the overall communications program, and specific WVDP communications activities.

There were two primary goals in gathering the information. The first goal was to determine general stakeholder satisfaction with WVDP operations. The second goal was to gather stakeholder input on specific communications activities to determine the relative value of each and identify possible areas of improvement.

Individuals were selected that actively participated in one or more of the WVDP outreach activities. Individuals were chosen from the Coalition on West Valley Nuclear Waste, the Seneca Nation of Indians, West Valley Central School Parent/Teacher organization, West Valley and Springville Chambers of Commerce, area elected officials, West Valley Volunteer Hose Company, League of Women Voters, area news organizations, Cattaraugus County Industrial Development Agency, Environmental Management Council, Department of Environment and Planning, area residents, Nuclear Regulatory Commission, Department of Environmental Conservation, and the West Valley Citizen Task Force. Information about the surveys was mailed to 38 individuals. Follow-up phone calls were placed to arrange face-to-face interviews at the interviewees convenience and choice of location. All information was kept confidential.

As indicated earlier, the Project seems to be enjoying a period of strong public acceptance. In general, the survey results corroborate the current community relations environment. A summary of the results follows:

Mission Performance—Overwhelming favorable responses for vitrification operations; somewhat less favorable responses for the Environmental Impact Statement-related performance.

Overall Communications—Consistently positive responses regarding the effectiveness and availability of Project information and management.

Specific Communications Activities—Although most communications activities received very positive marks, a review of the remarks provided by stakeholders regarding three communications activities provided insight into improvements that could be made. These three activities/tools were the Public Reading Rooms, Quarterly Public Meetings, and the annual Open House.

Where feedback from the survey had a direct impact on communications strategies, text boxes have been inserted to highlight the stakeholders' concerns. The accompanying text indicates the revision in communications activities that resulted from stakeholders' concerns.

- **Media Coverage**

A review of the WVDP media coverage in the first six months of this fiscal year revealed a limited number of media contacts. This was primarily due to the fact that the media was kept informed of Project progress, and “business as usual” isn’t generally considered newsworthy by news editors.

In the second half of the fiscal year, as work shifted towards projects that will transition the project from vitrification operations to long-term site cleanup and closure activities, specific efforts were made to heighten media coverage. This effort led to increased media coverage of new project cleanup preparations, culminating in extensive coverage of our contaminated groundwater remediation project on the north plateau. And we have taken

advantage of each media opportunity, regardless of topic, to communicate the message that long-term site cleanup/closure decisions are pending.

- Open House

Survey Input - Stakeholders noted that more encompassing tours of the site during Open House would be beneficial for the public in understanding some of the long-term site management challenges.

Upon consideration of declining attendance at the annual Open House, the focus was shifted away from the traditional approach, which primarily addressed local community members. The concept was refocused toward connecting the already successful community and the educational outreach activities to create a new package to deliver the Project's messages. The result was a very successful two-day event in early May that attracted more than 1,200 visitors. The event met the needs of both the general public and schools and extended the Project's reach to communities and schools outside our usual outreach base.

- Visits by Elected Officials

Recognizing the Project's need for collaborative support from federal and state-elected officials, we intensified our efforts to raise their level of awareness about the Project. This was accomplished through site visits, not only by officials from this district, but officials from adjacent districts as well. The following elected officials have visited the WVDP:

- May 4 US Congressman Amo Houghton
- Staffer for US Senator Daniel Moynihan
- July 30 New York State (NYS) Senator Pat McGee
- NYS Assemblyman Dan Burling and staff
- NYS Assemblywoman Catherine Young
- August 18 Staffers for Congressman Houghton and Senators Moynihan and Hollings
- August 25 US Congressman Jack Quinn and staff

Additionally, since Congressman Quinn's visit, he has assigned Ron Hayes to act as a liaison between the Congressman's office and the WVDP.

On a local level, the Public and Employee Communications department has participated in both the West Valley and Springville Chambers of Commerce. Participation in the Springville Chamber of Commerce has increased significantly.

- Visits by DOE Officials

On March 17, Jim Turi, DOE-Headquarters, attended a Citizen Task Force meeting to introduce DOE's "vision" for site cleanup activities. This presentation was provided at the request of the CTF for feedback from DOE on the CTF's recommendations. Feedback

from CTF members indicated that they appreciated the effort by DOE to keep the CTF informed of the direction DOE is taking during this difficult decision-making period.

On May 4, 1999, Secretary of Energy Bill Richardson visited the site. Stakeholders were invited to listen to the Secretary's remarks, and came away with the impression that senior DOE management is listening to stakeholder concerns and considering those concerns in the decision-making process. During that same visit, Secretary Richardson committed to completing the negotiations between DOE and New York State over future project responsibility.

A month later, on June 21, the new Ohio Field Office Manager, Susan Brechbill, met with stakeholders during a visit to the WVDP. This continued senior management attention reinforces stakeholders' confidence in DOE.

- Tribal Relations

Progress has also been made in work with the Seneca Nation of Indians. Recent communications successes include the completion of radioactive waste transportation orientation sessions. This activity was included in the Cooperative Agreement between DOE and the Seneca Nation to examine the possibility of shipping radioactive waste across Seneca lands.

- Quarterly Public Meetings

Survey Input—A number of comments were received that more information and communication emphasis should be placed on long-term waste and facility management challenges.

In the past couple of years, topics addressed at the Quarterly Public Meetings focused on updating the public about vitrification design, construction, and operation. Based on feedback identified in the stakeholder survey, topics for the more recent meetings have refocused on EIS-related messages.

- Educational Outreach

This is an area in which the WVDP has always excelled. In addition to the traditional school tours and presentations, the Project supports several educational outreach activities.

- Mentoring Program

One-on-one mentoring sessions between Project employees and local elementary and middle school students. On average, more than 30 employees participate.

- Horizons Program

Work/study program for seniors from three area high schools that provides real life work experience to students.

- Historically Black Colleges and Universities (HBCU)

Since 1995, the WVDP has actively recruited students from HBCUs to participate in the summer student program.

— Buffalo Engineering Awareness for Minorities (BEAM)

This organization has been supported by the Project through the traditional means of providing tours and presentations, but also by providing technical advisors. A Human Resources representative is on the BEAM Board.

— Buffalo Elementary School of Technology (BEST)

Two years ago, the WVDP adopted an elementary school in the city of Buffalo. In addition to supplying technical advisors and providing tours and presentations about the WVDP, employees have participated in *Teacher for a Day* and *Career Day*.

— DOE Academic Achievement Awards

Each year, DOE presents awards to students from three area schools who demonstrate excellence in the study of science, for a total of 12 awards. This year the awards were presented to students by Secretary of Energy Bill Richardson.

— Liaisons with Universities

The University of Buffalo played a major role in the development of a permeable treatment wall that was recently installed to stem the flow of contaminated groundwater at the site. UB members performed extensive testing on how the barrier material will perform.

A new relationship with St. Bonaventure University is under development. The WVDP will help sponsor outreach and recognition efforts for St. Bonaventure's School of Journalism and Mass Communication in return for public relations and communications consulting services for the WVDP. Additionally, in the next several months, plans are underway to establish a similar relationship with Buffalo State.

- Public Reading Files

Survey Input—Stakeholders who used the reading files suggested that reorganizing the documents might assist individuals in locating information more easily.

The Public Reading files were reorganized, labeled and an updated directory was developed. Additional EIS-related documents will be added to the Reading Rooms as they become available.

- Community Citizenship

Considering the small site population, the spirit of giving to the community is immense. When the annual Food Drive began in 1989, Project personnel donated 665 pounds of food for local food pantries. In November 1998, that level was raised to 43,840 pounds—more than 22 tons of food. That donation helped feed 677 families in our region. United Way participation has also steadily increased over the years. Last year WVDP employees contributed \$94,000 to the United Way, an increase of 7 percent.

In the past, the WVDP has attended both the West Valley and Springville Chambers of Commerce, but over the past year, WVDP participation in the Springville Chamber of

Commerce has increased significantly. As a member of the Springville Chamber Board, a WVDP representative led a campaign to raise funds for the area Christmas lights, successfully raising more than five thousand dollars.

The prime contractor, Westinghouse, was sold to Morrison Knudsen this past summer. This activity, which could have had significant impact on the Project and on outreach activities, was completed seamlessly.

SUMMARY

Although current communications strategies seem to be working, we must continue to guard against benign neglect—in other words, we need to be careful not to assume a false sense of security.

With that in mind, we're going to continue doing the community outreach activities that have worked for us in the past such as Quarterly Public Meetings, Open House, educational outreach, tours and presentations. But as the Project nears a decision regarding site cleanup and closure, we will pursue opportunities and apply innovative methods for communicating the Project's messages and developing strong community relationships and support.

This page is intentionally blank.

ATTACHMENT 2.

A TASK-SPECIFIC SAMPLE COMMUNICATIONS PLAN

The Preferred Alternative for the South Plume Engineering Evaluation/Cost Analysis

OBJECTIVE:

The objective of this plan is to provide a framework for communicating with key stakeholders and interested parties about the preferred alternative identified for the South Plume Engineering Evaluation/Cost Analysis document. The preferred alternative is to pump the contaminated plume of groundwater from the aquifer and to dump it into the Great Miami River. This alternative is likely to be opposed by area residents.

AUDIENCE:

- Local residents of the Fernald site
- State and national environmental groups
- Local township trustees and county commissioners
- Fernald Residents for Environment, Safety and Health, the local watchdog group
- Concerned state agencies
- U.S. and Ohio Environmental Protection agencies
- Regional news media
- Fernald employees.

STRATEGY:

- The overall strategy is to conduct a workshop on the document, with presentations emphasizing that the preferred alternative is simply a recommendation not a final decision. The workshop will be held from 7 to 9 p.m. on May 30, 1990 at Crosby Elementary School, 1234 New Haven Road, Harrison, Ohio. There will be three DOE panelists: One to speak on the South Plume document, one to address risk concerns, and one to talk about public participation.

A flip chart will be used at the meeting to list general concerns expressed by participants, but a court reporter also will attend to capture comments. The handouts include:

- The Engineering Evaluation and Cost Analysis document

- A progress report on the South Plume, the nature and extent of the problem
- The Fernald site overview fact sheet
- A schedule of the activities required for the Remedial Investigation and Feasibility Study under the Amended Consent Agreement.

MESSAGE:

- No decision has been made on the South Plume removal action alternative; the public still has ample opportunity to voice its concerns
- Discussions of the removal action process and how the preferred alternative for the South Plume was identified.

TACTICS:

- Publicity will include a news release, distribution of flyers in the surrounding communities, advertisements in the three local newspapers, and an invitation letter to key stakeholders.
- DOE will conduct individual courtesy calls/briefings with members of the news media and key community leaders.
- Township liaisons and other Fernald envoys will announce the workshop with their groups.
- Public Service Announcements will be sent to the electronic news media.
- The employee publications will promote the workshop.

BACKGROUND:

- This Engineering Evaluation/Cost Analysis is the first to be generated for the Fernald site; public interest is high.
- The South Plume groundwater contamination has been of concern since it was identified in 1989, and the plume is traveling toward a public water supply well field at a rate of 200 feet each year. Without any action, the plume will reach that well field in 5 years.
- Several residents who have had elevated levels of uranium in their wells now receive bottled water, paid for by DOE.
- The Engineering Evaluation/Cost Analysis document has been delivered to U.S. and Ohio EPA.

SENSITIVITIES:

- People who have been drinking from their wells are concerned about the potential health risks associated with the uranium contamination in the South Plume; they want DOE to pay to extend the public water supply and pay for their hookups.
- Area residents have historically opposed any dumping into the Great Miami River, which has some recreational value for fishing and boating. They are concerned about the impacts to the river from increased dumping.

This plan addresses a hypothetical situation; it is included only to illustrate the elements of a communication plan.

This page is intentionally blank.

ATTACHMENT 2A

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT Required and Supplemental Public Involvement Activities

Required Public Involvement Activities:

- Provide DOE Spokesperson and Community Point of Contact
- Establish and Maintain Information Repository
- Brief Local Officials
- Conduct “Kickoff” Meeting(s)
- Notify Public of Availability of Feasibility Study and Proposed Plan
- Public Notice
- Conduct Public Comment Period
- Provide Public Meeting with Transcript
- Notify Public of Availability of ROD and Responsiveness Summary
- Prepare Explanation of Significant Differences (if any)
- Revise CRP, if necessary
- Notify Public of Remedial Design
- Prepare Fact Sheet on Final Remedial Design
- Notify Public Prior to Beginning of Remedial Action

Supplemental Public Involvement Activities:

- Conduct Briefings
- Contact Community Members
- Conduct Public Meetings and Availability Session
- Develop Mailing List
- Designate Agency Contact
- Solicit Citizen Input for Evaluating FS Alternatives
- Respond to Media Inquiries
- Maintain Public Dialogue

- Develop and Distribute Fact Sheet
- Issue News Releases
- Offer Public Meeting, Availability Session, and Workshop
- Offer Public Meeting on Remedial Design Work Plan and Approach
- At Preliminary and Pre-Final Design Phase Offer Public Meeting; Prepare Public Information Tools (e.g., Fact Sheet(s), Newsletter Article(s), News Release, etc.); Notify Public of Documents of Significance
- Maintain Public Involvement and Dialogue
- Conduct Site Tours
- Provide Briefings at Township and Community Meetings
- Provide Briefings at Township and Community Meetings
- Issue Fact Sheets and Newsletters to Provide Periodic Updates Describing Cleanup Activities
- Conduct Press Briefing and Issue News Releases
- Review/Revise CRP.

ATTACHMENT 2B

SITE OVERVIEW COMMUNITY PROFILE AND CONCERNS

Site Overview

The Fernald site is bounded by Ohio Route 126 to the north, a transmission line to the east, Wiley Road to the south, and Paddy's Run Road and the Chesapeake and Ohio railroad to the west. It occupies 1,050 acres, of which about 850 lie in northern Hamilton County and about 200 in adjacent Butler County. The site is about 17 miles northwest of Cincinnati.

Although Hamilton and Butler counties are generally urbanized, the area immediately surrounding the Fernald site is primarily rural and dominated by agriculture, with some light industry. Commercial and public land uses include sand and gravel operations, industrial facilities, some retail businesses, nurseries, schools and parks.

The federally-owned Fernald site is considered part of Hamilton and Butler counties; it does not constitute a federal reservation.

Construction of Fernald began in 1951 and production started in 1952. The facility produced high-quality uranium products, which were used to make nuclear weapons. In July 1989, DOE suspended production. In February 1991, the agency proposed shutting the facility for good and focusing on cleanup. That plan was approved in August 1991.

Since 1952, various radionuclides and other contaminants have been discharged to the air, soil, and water. The principle contaminant of concern is uranium, although some thorium and radon also have been released into the environment. Non-radioactive hazardous substances, such as hydrofluoric acid, nitric acid, and sulfuric acid, have been handled at Fernald. Known and potential releases of radionuclides were significant enough for the site to be placed on the National Priorities List in 1989.

Community Profile

The combined population of Hamilton and Butler counties is about 1.2 million people. Hamilton County has a population of about 870,000, and Butler County has a population of about 292,000, according to 1990 census figures. Most of the communities surrounding the site are unincorporated towns varying from an estimated population of 39 in the Village of Fernald to about 3,000 in Ross.

The township is the unit of local government in the area in which the Fernald site is located. There are three township governments within the immediate vicinity of the site: Crosby

Township in Hamilton County, and Ross and Morgan townships in Butler County. Representatives of these township governments participate in emergency preparedness exercises and receive regular reports about cleanup. Township officials also are notified about unusual activities at the site.

The nearest public schools are about one to two miles from the site. Air monitoring stations and/or emergency warning signs are located near the schools in the vicinity of the site.

Area residents became concerned about environmental issues at Fernald in late 1984 when it was reported that nearly 300 pounds of slightly enriched uranium oxide had been released into the air from a dust-collector system at the plant. The public also learned then that three wells south of the site had been contaminated with uranium since 1981. Several residents in 1984 formed an activist group, Fernald Residents for Environment, Safety and Health (FRESH). The group continues to monitor Fernald activities closely.

In 1985, residents filed a class-action lawsuit seeking damages for emotional stress and decreased property values. The lawsuit was settled, with DOE agreeing to pay a total of \$78 million—\$73 million for health monitoring and epidemiological studies and \$5 million to local property owners. The U.S. Environmental Protection Agency (EPA) and the Ohio Environmental Protection Agency (Ohio EPA) assumed active oversight responsibilities at the Fernald site.

In 1986, DOE began a remedial investigation and feasibility study to determine the nature and extent of contamination at Fernald, and the best way to clean it up. As the investigation progressed, additional wells were found to contain above-background levels of uranium. The contamination in the groundwater is called the South Plume, and it extends beyond the southern boundary of the site.

DOE agreed to provide bottled water to people whose wells registered elevated levels of uranium. In 1993, DOE agreed to pay the cost of a public water supply system in the area affected by the South Plume.

Community Concerns

Credibility is a major issue for Fernald officials; past practices, most vividly illustrated by the Cold War's "cult of secrecy," have not inspired confidence among area residents. Even though there has been a warming in the relationship between DOE and the public, DOE and its contractors are judged solely by their deeds, and not their words. One of the objectives of the public involvement program is to overcome this credibility gap.

After community members learned that the Fernald site was responsible for the release of contamination into the environment, they voiced concern about several issues in a series of meetings held in 1985. They include:

- DOE's credibility and ability to clean up the site
- Lowering of property values because of the contamination
- Long-term health effects of Fernald activities on the surrounding population.

To expand and update this information, DOE conducted a series of community interviews in 1986 and 1989. The concerns expressed then were very similar to those first identified in 1985.

Current community concerns include future land use, on- versus off-site disposal of radioactive and hazardous wastes, migration of contaminants during cleanup activities, and cleanup levels.

This page is intentionally blank.

ATTACHMENT 3

SAMPLE COMMUNICATIONS PLAN

Hanford Advisory Board Draft White Paper Public Involvement Evaluation

The Hanford Advisory Board prepared the following plan that:

- Provides a general set of principles for evaluating public involvement
- Evaluates existing public involvement
- Helps guide development and implementation of existing and new public involvement
- Provides insight into the public participation process from the public's point of view.

Evaluating Hanford Public Involvement: Goals, Activities, and a Framework for Discussion

As every Hanford Advisory Board (HAB) member knows, the issues associated with the Hanford site are many and complex. A frequent comment at HAB meetings expresses the scope of these issues: participants often state with exasperation: "I'm having trouble getting my arms around this." This comment is heard from technical specialists and non-specialists alike, for no one is expert in all the issues that come together at Hanford. Science, technology, engineering, management and administration, regulation and law, finance, planning, health and safety, and operational knowledge are just some of the dimensions of the Hanford cleanup effort.

Another key aspect of the work at Hanford is the problem of public involvement, the topic of this report. Scope, scale, complexity, and technical barriers make it especially difficult for members of the public to "get their arms around" the issues and participate meaningfully in decision making. Meaningful public participation is necessary for two reasons. First, there is "the general democratic principle...that those who bear the consequences of decisions should have proportionate shares in making them."¹ Hanford's public health, safety, economic, and environmental impacts affect all the residents of the Pacific Northwest, and its budgetary impact is national. A broad public is affected by decisions regarding Hanford, and a broad public must participate in these decisions. Second, there is the practical need for "local knowledge" and regional and community values that only the public can provide. Issues such as cleanup standards, future site uses, and effects on regional and local communities can only be decided with the close involvement of the public. Public involvement is not a mere supplement to the knowledge of technical specialists and managers; rather, it is an absolutely essential ingredient in the decisions they make.²

For these reasons, the federal and state officials who administer and regulate Hanford through the Tri-party Agreement (TPA) must have regular, substantial, sustained, and effective contact with the public. A wide variety of mechanisms have been developed for this purpose, and a great deal of effort and commitment to this goal is evident. Nevertheless, it is important to periodically re-examine these efforts to improve their effectiveness. The stakes at Hanford are high, and public involvement must be proportionately high in both quantity and quality.

In April 2001 the Public Involvement and Communication Committee began a review of the goals, mechanisms, and effectiveness of Hanford public involvement. Our discussions have taken place via a series of committee meetings, conference calls, and electronic mail exchanges involving committee members, representatives of the three TPA agencies, contractor staff, and facilitators. Below, we summarize these discussions for consideration by the HAB. Our goal is to provide a framework for a larger discussion of public involvement by the full Board. We believe that this larger discussion will be valuable whether or not it leads to further Board action or formal advice to the TPA agencies. The following summary represents consensus reached by the HAB members and alternates who serve on the committee, in consultation with the agency and contractor representatives who participated in our committee discussions.

Goals and Evaluation Criteria for Public Involvement

Our committee discussions have identified ten characteristics of effective public involvement. These characteristics overlap considerably and reinforce each other. They can be understood as broad goals or general principles, and can also serve as starting points for developing criteria to evaluate specific activities.

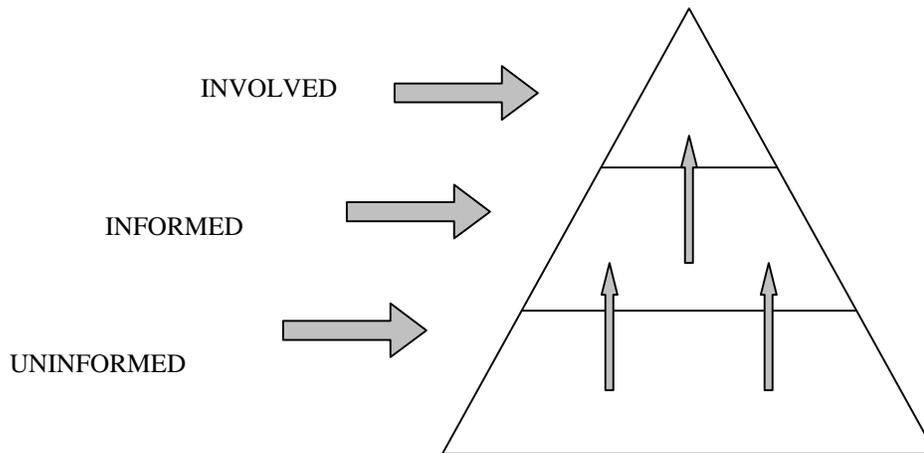
1. Broad and inclusive (Who participates?)

Public involvement activities should reach out to and engage the broadest possible constituency. Participation should expand beyond “the usual suspects” who already participate. A diversity of viewpoints fosters fresh approaches to issues, the identification of previously unrecognized issues, and opportunities to “reframe” issues productively. It is also a basic prerequisite for fair and democratic decision-making.

Problems in this regard include identifying affected parties and communities, developing and conducting public involvement activities that meet their particular needs, scheduling and promoting these activities appropriately, motivating people to participate by demonstrating the relevance of issues to their own concerns, and putting public input to use in decision processes.

Particular problems exist when issues have highly technical dimensions, as they often do at Hanford. Research conducted for the National Science Foundation indicates that only a small fraction of the public is “involved” in technical issues. A larger fraction is “informed” but not actively involved. The majority of the public is “uninformed.”³ As illustrated in figure 1, an important challenge is to move people from the uninformed to the informed group, and from the informed group to the involved group.

Figure 1.



Our emphasis here on broad and direct participation is not meant to discount the special roles played by “opinion leaders,” such as HAB members, or by agency personnel, contractor representatives, or technical experts. These closely-involved participants have important contributions to make, and must be allowed to operate effectively within their appropriate domains. However, the work done by these parties must be accompanied by broad and direct participation. Public involvement mechanisms such as the HAB and the Oregon Hanford Waste Board are important forms of “representative democracy,” but must be balanced with mechanisms for “direct democracy.”

2. Open and accessible

Public involvement activities should be open, in the sense that no one is intentionally or unintentionally excluded. This issue extends beyond the “letter of the law” for open meetings and other public involvement activities, which addresses intentional exclusion. Unintentional exclusion can occur in forms such as inconvenient scheduling and location of public meetings, failure to promote public involvement opportunities in a broad and timely manner, announcing opportunities solely in media that have restricted audiences, or relying exclusively on communication technologies that are not available to all affected parties. These failures are not necessarily common in Hanford public involvement, but we should be conscious of their possibility and careful to avoid them.

3. Substantive

Public involvement should address substantive issues, allowing affected parties to understand these issues and genuinely influence outcomes. This goal is especially difficult to achieve when technical issues are at stake. Although expert knowledge is essential in addressing technical issues, experts cannot replace the public in expressing community values and providing local knowledge. Therefore, substantive public participation requires ongoing educational and informational efforts by specialists, to provide members of the public with a working grasp of the

technical, legal, and regulatory issues. Specialists and the public should be understood as equal collaborators in this process. Announcements of public involvement opportunities should highlight the relevance of issues to the public, in order to motivate substantive public participation.

4. Timely (formative role in decisions)

Public involvement should come sufficiently early in the decision process to have genuine influence. The “decide, announce, defend” approach, in which the public is presented with a finished or nearly-finished product and can do little more than approve or disapprove, is especially alienating for many members of the public. Public involvement should play a formative role in the definition of problems, the development of solutions, and the establishment of decision criteria. We recognize that the definition of “timely” public involvement depends upon the issues being considered, and that some development of the issues must take place before they can be addressed publicly. Nevertheless, efforts should be made to incorporate public involvement sooner, rather than later, whenever possible.

5. Regular (ongoing, understandable process)

Public involvement should be continuous and ongoing. Although many issues require discrete and specific public involvement at particular points in time, these should be viewed within a larger framework of regular contact between stakeholders and officials. When public involvement follows regular schedules and patterns, people can participate more easily and more effectively. Additionally, regular public involvement fosters the development of good working relationships between the public and officials. When necessary, public involvement opportunities for specific, transient issues can be added to existing and familiar cycles of ongoing communication.

6. Cumulative (“institutional memory”)

HAB members have often pointed out that the Board serves as Hanford’s institutional memory, preserving knowledge and values beyond the tenures of individual agency or contractor personnel. This principle applies to public involvement more generally, as well. Public concerns and values tend to be stable and consistent over time, and the public involvement process should make use of this fact. By anticipating public concerns, when possible, and by being prepared to address these concerns, the TPA agencies can avoid “reinventing the wheel” and maintain continuous progress toward goals shared with the public.

7. Interactive (genuine dialog; all parties speak, all parties listen)

Effective public involvement takes place within a framework of genuine dialog. Communication should flow both ways between officials and stakeholders, interactively and recursively. All parties should have opportunities to speak, while the other parties listen carefully and attentively. The roles of “speaker” and “listener” should be shared equally and exchanged frequently. In genuine dialog, the parties are open to changes in how they understand the issues and in the

positions they take on the issues, based on what they learn from others. The TPA agencies can support this principle of dialog by responding to public comments (to the degree reasonable); by following-up on suggestions, questions, and expressed concerns; and by demonstrating their commitment to making substantive use of public comments.

8. Legally compliant (meets all applicable legal and regulatory requirements)

Public involvement is driven, in part, by a legal and regulatory framework. Where federal and state laws apply, and when the TPA provides guidelines for public involvement, these standards must be carefully observed.

Cleanup of the Hanford Site falls under several federal and state laws. Each of those laws have specific requirements for public involvement. To the degree feasible, public involvement activities should be designed to satisfy those overlapping requirements so that cleanup can proceed more effectively, with greater public understanding and support.

The major federal laws which apply are the National Environmental Policy Act (NEPA), the Resource Conservation and Recovery Act (RCRA), and the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA, also known as "Superfund"). The corresponding Washington State laws are the State Environmental Policy Act (SEPA), the Hazardous Waste Management Act (HWMA), and the Model Toxics Control Act (MTCA).

Both NEPA and SEPA require the preparation of a Environmental Impact Statement (EIS) when there is likely to be a significant impact. Associated with the EIS are specific requirements for citizen notice and opportunity to comment. Under both CERCLA and MTCA there are requirements to prepare a plan for citizen involvement, with slightly different mandates under each law. In designing public involvement opportunities, awareness of the various requirements will result in coordinated activities. The logical vehicle for this coordination is the Community Relations Plan prepared by the three agencies under the Tri-Party Agreement.

9. Reflexive (self-correcting)

Public involvement should be reflexive; that is, there should be public involvement in how the public involvement process is conducted. Surveys, response cards distributed at public meetings, and other methods should be used to assess public satisfaction and to explore new ways of enhancing and expanding public involvement. Special efforts should be made to encourage alienated and disenfranchised groups to provide advice in this regard.

10. Trust-building

All of the principles described above support the overarching goal of developing relationships of mutual trust among the TPA agencies and Hanford stakeholders. Although the need for trust is often mentioned in discussions among these parties, it is clear that in practice trust is difficult to achieve and to maintain. Nevertheless, it is central to progress in resolving the issues at Hanford.

We believe that by striving to honor the principles described here, the agencies and stakeholders can move forward productively to build trust and collaborate more effectively.

Existing Mechanisms for Public Involvement

To begin an inventory of existing mechanisms for public involvement, the three TPA agencies, the Oregon Office of Energy, and Heart of America Northwest each filled out a chart summarizing their activities (see Appendix A). The completed charts, and our committee discussions, demonstrate that a great deal of serious effort and commitment already exists. More than 50 unique activities were identified, with many of these used by a number of the organizations.

The following is a very condensed summary of these activities, grouped by broad categories. In some cases, we provide comments and questions regarding strengths, weaknesses, and other aspects of the activities reported. Although much could be said about each of these activities, our main purpose here is to provide a list of them for review by HAB members. One way to make such a review meaningful would be to evaluate each activity in terms of the ten public involvement principles described above.

Audiovisual Media

Photographs, videotapes, and CD-ROMs serve educational, consciousness-raising, and information distribution goals.

Comments: How widely is the availability of these materials promoted? What is the process for requesting or receiving these items? Who is, and who is not, aware of their availability and how to obtain them?

Community Outreach

Speakers bureaus, meetings with civic groups, Earth Day, fairs, expos, exhibits, school outreach, Oregon Community Outreach Initiative, see other listings under “meetings.”

Electronic and Interactive Media

Websites, listserves, direct e-mail access to agency staff and stakeholder groups.

Emergency Preparedness Activities

Interagency coordination takes place, along with some public involvement in individual agency plans.

Environmental Impact Statements

As required by law, with public comment periods.

Focus Groups

Utilized by some agencies, including the Oregon Office of Energy, to sample public opinion on particular Hanford issues.

Grants

Public participation grants, technical assistance grants, etc. Funding sources include DOE, EPA, MOTCA; some grants are administered through the Washington State Department of Ecology and the Oregon Office of Energy.

Hanford Advisory Board

The HAB is a central mechanism for public involvement. It provides a regular and ongoing forum for contact between officials and representatives of the public. Issues are discussed in greater depth than in most other venues. However, it should be noted that the HAB is a form of “representative” or “interest group” democracy, rather than “direct” democracy. The potential exists for HAB members and alternates to become distanced from the general public, and even from their own constituencies, and for the HAB to supplant more direct forms of public involvement. In this regard, HAB members should be especially conscious of their responsibilities to their own constituencies. Also, the HAB should address its contributions to public involvement explicitly in its annual self-evaluation.

Mail

Stakeholder mailings, individual inquiries/comments, and replies.

Meetings

DOE annual budget meetings, agencies provide informational meetings as requested, agencies and public interest groups sponsor meetings/forums/workshops, Oregon Office of Energy and Washington Ecology provide regular stakeholder meetings, agency focus groups, TPA quarterly public involvement planning meetings, HAB, Oregon Hanford Waste Board, expert panel meetings, town halls, road shows, worker compensation public meetings, Hanford Public Interest Network (HPIN), Tri-cities Caucus.

Comments: Meetings, of many kinds, are probably the most utilized of all the public involvement activities. Meetings are attempts at direct democracy, but often provide only limited opportunities for members of the public to engage with issues and decision makers. In many cases, this engagement is brief and comes only after the issues have been framed and a narrow menu of choices has been developed. In the worst cases, meetings provide “hollow participation in which citizens merely make noise in some political ritual” rather than “real influence over outcomes.”⁴ As one critic notes,

in most public hearings the agency defines the agenda and establishes the format. The hearing itself provides limited time for citizens to understand the technical or policy issues and to take a substantive part in the discussion. Indeed, the reliance on public hearings as a mainstay of public participation is one of the weaknesses of the administrative process in the United States, in part because of the unequal relationship of citizens to government officials....Public hearings typically do not give citizens a share in decision making. Although they provide mechanisms for public views to come to the attention of administrators, they do not directly engage citizens in the process of making policy choices or cede to citizens any control over the decision process itself.⁵

These criticisms do not necessarily apply to all Hanford public involvement meetings, but they are worth noting as cautionary advice.

News Releases

Agencies and public interest groups provide frequent releases for use by news media.

Oregon Hanford Waste Board

Like the HAB, the Oregon Hanford Waste Board provides a forum for regular and more substantive contact between officials and representatives of the public. Similar concerns apply regarding the balance between direct and participatory democracy.

Publications

Annual reports, fact/focus/information sheets, *Hanford Happenings*, *Hanford Reach*, *Hanford Update*, brochures, reports, pamphlets.

Public Comment Periods and Response Documents

The TPA agencies, together and individually, provide public comment periods as required by law and sometimes when not legally required. Comments are solicited on Environmental impact statements, TPA changes, permits, CERCLA decisions, agency initiatives, budgets, and some additional documents and plans. In many cases, agencies provide response documents following these comment periods.

Public facilities

Public reading room, offsite repositories.

Public Involvement Evaluation

Annual TPA public involvement evaluation, response cards at meetings, surveys, HAB annual self-evaluation. Word-of-mouth provides another form of evaluation, but is not captured very effectively.

Public Involvement Plans (including TPA Community Relations Plan)

The individual agencies have public involvement plans, and together follow the TPA Community Relations Plan (CRP). The CRP is undergoing revision at present, with public comment as part of the revision process, and is intended to serve in part as a “handbook” or “users guide” for members of the public.

Site Tours

Hanford site tours are provided by the TPA agencies, for a variety of audiences. The Oregon Office of Energy facilitates WIPP site tours for regional officials, responders, and community leaders.

Telephone Access

The Hanford Hotline provides a point of contact between the TPA agencies and the public. Agency and public interest group staff take calls at their offices. Interest groups operate phone banks to alert members to upcoming issues and public involvement opportunities.

HAB Discussion and Path Forward

Our committee has identified a set of goals and a wide range of existing activities for Hanford public involvement. However, our discussions have led us to conclude that the committee is neither large enough nor diverse enough to take the next step, evaluating the existing activities in relation to the goals. We believe that it would now be useful for the full HAB to devote some time to such a discussion, beginning during the December 2001 meeting and proceeding as determined by the Board. This discussion might lead to further research by the committee at the Board's request, to further discussion by the Board at future meetings, to formal advice or other Board action, or might reach closure at the December meeting. In any case, the discussion will have value in fostering a more self-aware approach to public involvement. To begin this discussion we offer the following questions:

1. Do the ten principles described above reflect the goals of Hanford public involvement adequately and accurately?
2. What are the HAB's expectations regarding public involvement, in regard to the TPA agencies, stakeholder groups, the Tribes, and other constituencies represented on the Board?
3. What is the HAB's own proper role in public involvement? Possibilities include advising, critiquing, or overseeing the public involvement process (directly or through the Public Involvement and Communication Committee), acting as a surrogate for the public in decision processes, reaching out to HAB constituencies, or collaborating with or assisting other organizations. Once an appropriate role has been identified, how can it best be accomplished?
4. Does the HAB want to be involved further in exploring the issue of public involvement?
5. Based on the committee's work and the Board's discussion, can we identify a path forward toward more effective public involvement?

Notes

1. Sandra Harding, in D. L. Kleinman (Ed.), Science, Technology, and Democracy (pp. 126-127). State University of New York Press, 2000.
2. Frank Fischer, Citizens, Experts, and the Environment: The Politics of Local Knowledge. Duke University Press, 2000.
3. Jon D. Miller, The American People and Science Policy: The Role of Public Attitudes in the Policy Process. Pergamon Press, 1983.
4. Frank Laird, "Participatory Analysis, Democracy, and Technological Decision Making." Science, Technology, and Human Values, vol. 18, no. 3, pp. 341-361, 1993.

5. Daniel J. Fiorino, "Environmental policy and the participation gap." In W. M. Lafferty & J. Meadowcroft (Eds.), Democracy and the environment: Problems and prospects (pp. 194-212). Cheltenham, UK: Edward Elgar Publishers, 1996.

Appendix A

Template for Evaluating Public Involvement and Communication Activities

Activity	Current Approach	Strengths	Weaknesses	Possible Changes	Evaluation Criteria

This page is intentionally blank.