



ECA Transition Paper: Roadmap for DOE to Successfully Engage with Local Communities

Executive Summary

Energy Communities Alliance’s (ECA) goal is to promote a collaborative working relationship with the Department of Energy, including the National Nuclear Security Administration (collectively “DOE”), that benefits the communities and DOE. ECA¹ works with DOE to achieve solutions that protect and contribute to the health, safety, and economies of the communities that host DOE’s federal facilities. This collaboration can facilitate opportunities around DOE sites and further the success of the DOE mission.

While DOE missions bring jobs and economic benefits to a region, many ECA communities suffer from environmental contamination, making economic diversification extremely challenging. In addition, tax exemptions related to the federal facilities place a special burden on local citizens to fund services that the federal government utilizes. Local communities are partners, customers, and advocates of DOE’s ongoing operations and performance, budgeting, cleanup prioritization, and mission integration.² Although DOE and the community may not always agree on the approaches to achieving success, ECA aims to identify common goals, to bridge the gap, and to bring local and federal officials together to create viable solutions.

Over many years working with DOE and communities directly impacted by DOE activities, ECA recognizes that the greatest successes have been achieved when DOE actively pursues meaningful engagement with host communities. To that end, ECA developed the following priorities for working with DOE to foster collaboration and to best address future challenges and opportunities:

- I. Success of DOE missions can be accomplished through local government involvement in DOE (including NNSA) decision making**
 - a. Engage communities in planning for both short-term and long-term site goals;
 - b. Engage communities in the contracting process; and
 - c. Engage local governments in nuclear waste management and disposal policies.
 - d. Engage DOE host communities as potential champions for advanced nuclear development.
- II. Fund environmental cleanup and ensure local government input into cleanup decision-making and resource allotment**
 - a. Ensure adequate mission funding as communities are the customer in the EM mission;

¹ Energy Communities Alliance is the national association of local governments of communities that host or are affected by U.S. Department of Energy including the National Nuclear Security Administration (NNSA) facilities¹ (collectively “DOE”).

² ECA focuses on issues related to the Offices of Environmental Management (EM) and Nuclear Energy (NE), and the NNSA. An archive of ECA [updates](#), [publications](#), [letters and comments](#), and [presentations](#) regarding these agencies and offices can be found on the ECA website.

- b. Engage with communities using better risk communication practices and tools; and
 - c. Where conflict exists on cleanup remedies try to resolve through early and regular engagement.
- III. Support the current and future workforce at DOE facilities and economic development of host communities**
- a. Invest in workforce development, education and apprenticeship programs;
 - b. Identify opportunities to work with the community on economic activities that facilitate the DOE/NNSA mission; and
 - c. Support real and personal property transfers that support community reinvestment.
- IV. Create a high-level waste and spent nuclear fuel storage and disposal program**
- a. ECA desires to work with the incoming Administration to find solutions for the storage and disposal of high-level waste and spent nuclear fuel;
 - b. Analyze risk of inaction to communities;
 - c. Continue evaluating alternative disposal options if waste is classified by radiological content rather than origin;
 - d. Recognize that the absence of a solution could impact development and deployment of new nuclear technologies that are key to a low-carbon energy future;
 - e. Engage local governments and others on the siting process; and
 - f. Pursue interim storage in parallel with siting a permanent geologic repository.
- V. Support the development of new nuclear technologies**
- a. Support development of nuclear missions and projects in communities that are willing to host the facilities.
 - b. Collaborate with local communities, colleges/universities, and trade schools to bolster education and STEM programs.
- VI. Integrate ECA's DOE contracting (acquisition) reform recommendations and principles**
- VII. Promote intra-agency cooperation and communication across DOE program offices, headquarters, and sites to avoid delays, confusion and inconsistent decision-making**
- VIII. Invest in host communities and the DOE complex**
- a. Resolve the DOE maintenance and infrastructure backlog;
 - b. Utilize national laboratories for project development and workforce development opportunities; and
 - c. Support the Manhattan Project National Historical Park.

ECA encourages the Administration and DOE leadership to support strong relationships with partner organizations, particularly local governments and their elected officials. Strong communication and relationships built on trust can endure transitory moments of disagreement or difficulty. More importantly, these relationships provide all interested parties with the information needed to make educated decisions that can ensure progress toward our shared goals.

ECA members and staff are available as expert resources to all involved in the Administration transition. Questions and requests for appointments may be directed to MacKenzie Kerr, ECA Program Manager, by phone 202-828-2410 or email mackenziek@energyca.org.

Enclosure



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I. Success of DOE missions can be accomplished through local government involvement in DOE (including NNSA) decision making

Maintaining partnerships and providing opportunities for meaningful engagement between federal decision makers and local elected officials are vital to ensuring a unity of purpose that advances mission priorities.

To be successful, DOE missions require community acceptance and thrive with community support. DOE and local governments work best when fully engaged in the decision-making at a site for issues that may impact the community.

Fortunately, DOE has primarily moved away from announcing a position publicly and then expecting support. Instead successes come when DOE engages directly with the local government prior to announcing a position publicly. ECA recognizes that this is not always feasible but prioritizing local government engagement can go a long way toward facilitating success of the mission. ECA also recognizes that a local government will not always be supportive of a decision, but the engagement may facilitate a path forward and it provides a candid discussion of the issues.

Local governments are responsible for the health, safety, and economic welfare of their communities, including the well-being of DOE employees and contractors. Local government input and support should not be taken for granted as ECA has found that meaningful, ongoing engagement by site managers and headquarters officials can alleviate confusion and build trust on all sides by reducing conflict (in some cases saving DOE hundreds of millions of dollars). The highest levels of DOE leadership should ensure that every site manager and prime contractor actively engage local government officials on a regular basis. DOE success stories (nuclear energy, cleanup, defense activities and others) share this fundamental tenet.

ECA supports open communication channels between DOE, sites, communities, and site managers when making short-term and long-term decisions. ECA's goal is to foster and encourage a strong working relationship between the DOE and local governments. These strong relationships include a necessary base of trust and communication to be fully operative and functional. All these components -- trust, communication, input, and support -- are pivotal to the identification of shared objectives, and mutual goals are a strong component in any project or undertaking. The

communication pathways between DOE and local communities impacted specifically by DOE activities must remain open and effective. Almost every DOE site currently has regular and on-going meetings between the local government and DOE site leadership – and ECA hopes that will continue under the new Administration.

Recommendations for DOE leadership:

- DOE and NNSA decision-making processes should involve consultation with local elected officials on a *pre-decisional* basis when any impact on the local community is possible.
- DOE and NNSA should continue to have meaningful engagement with local governments when developing programmatic proposals and environmental impact statements in order to educate interested parties and avoid mistrust and controversy.
- DOE and the local governments should work to resolve disagreements, explaining concerns and opportunities fully to attempt to develop solutions.
- DOE should proactively seek local government input when renegotiating federal facility agreements for environmental cleanup, as local communities and their citizens are most impacted by a decision’s lasting economic, environmental, and public health effects
- Engage communities in planning for both short- and long-term site goals.
- DOE should explain contracting decisions when new contracts are awarded or existing contracts renewed. DOE should recognize that acquisition strategies may have an unintended impact on the local community that can, in turn, impact the DOE mission.
- Recognize that a strong host community will support DOE’s recruitment, training and retention of the workforce for long-term missions.

II. Fund environmental cleanup and ensure local government input into cleanup decision-making and resource allotment

DOE must work closely with local governments and Congress to ensure the environmental cleanup budget is funded at levels that allow for significant progress toward fulfilling the federal government’s responsibilities and missions.

It is imperative that DOE’s budget requests and congressional appropriations meet the requirements of regulatory agreements with states, address the concerns and priorities of local government partners, and do not shortchange the health and safety of DOE’s workforce or citizens of local communities. ECA urges the Administration and leadership to engage local elected officials, communities, and other stakeholders at every stage of the budget process to ensure local priorities are addressed, working relationships are strengthened, and transparency is increased. ECA also urges the Administration and Congress to provide financial resources for education, outreach, and feasibility studies on the impacts associated with the implementation of vital DOE operations³. Local elected officials and communities can be powerful allies in the budget and appropriations process if engaged early and often.

Recommendations:

³ See “[The Politics of Cleanup](#),” Energy Communities Alliance, 2007, p. 47.

- DOE should engage local elected officials and other stakeholders at every stage of the budget development and appropriations process to create a budget that meets cleanup needs.
- DOE leaders should work with the Office of Management and Budget to develop regulatory-compliant budgets.
- DOE and NNSA should provide funding for education, outreach, and feasibility studies of vital DOE operations.
- DOE leadership must avoid the consequences that inadequate, unsustainable, unpredictable, and non-compliant budgets can have on the cleanup mission, trust with regulators, and health and safety of communities.

Engage with communities using cleanup risk communication practices and tools

As shown at many sites, for environmental cleanups to proceed the agency charged with cleaning up the site and the agencies regulating the cleanup must agree on numerous issues regarding risk — e.g., what risk level is achievable and politically acceptable, and what level of cleanup will ensure the agreed-to risk meets regulatory requirements. Public communication is not risk communication. For cleanups to garner the support of the local communities, the parties must agree on technical risks as well as community concerns of risk — e.g., will the community accept the given risk, can the risk be mitigated and remain protective over time (long-term stewardship) and can the risk that results from contamination being left at the facility support the future use?

DOE and the host communities share many common goals and they are always easier to achieve if both parties can trust each other and communicate about the actual issues.

With several different entities involved in cleanup and other nuclear related missions, it is natural for conflicts to arise. What is necessary is a process in place to address concerns and risk when they do. Following the law is the minimum but DOE, the State and community have many options for interactions to resolve disagreements.

Each site is different, and this can be recognized while also pursuing general processes and methods to resolve conflict through engagement. Risk-informed decisions must be made at the community level as well as the state and federal levels. The community should be provided materials and resources that allow them to understand the risk and therefore the entirety of the conflict.

Recommendations

- DOE/NNSA should be leading the effort to provide public information on contamination from their activities.
- DOE should focus efforts to build strong community relationships.
- DOE should provide resources so that an impacted community can hire experts to perform independent analyses of key community issues and enable local governments to educate their constituents.
- Real progress requires that (1) all necessary parties are engaged, (2) there is trust among the parties, (3) there is confidence in the path forward and (4) there is the political will and means to implement new policies or governance plans.

III. Support the workforce and economic development of host communities of DOE facilities

Invest in workforce development, education and apprenticeship programs

It is imperative that DOE and contractors commit to securing a workforce for the future.

The DOE workforce is aging, and many workers will retire during the course of this Administration, taking their technical skills and institutional knowledge with them. Yet cleanup at certain DOE sites is still decades away from completion. DOE partnerships with local universities and technical colleges have proven successful in the past through creating opportunities for workforce education and talent recruitment while simultaneously benefiting local communities by enhancing economic and educational opportunities. Local elected officials have seen the success of workforce development grants from DOE in South Carolina, New Mexico, Tennessee, and Washington State; these grants should be continued and expanded. Further, DOE should encourage its site leaders and contractors to support community education and workforce development by personally and regularly participating in community-sponsored events.

As workforce development addresses the needs demanded by DOE missions and projects, workforce development also aligns with the Administration's plans in fulfilling obligations to workers and communities. Economic development of host communities provides long-term community stability and ECA agrees that the communities that support the government should not be left behind by that very government. Investing in STEM, internships, and apprenticeships provides the foundation for developing a workforce that will secure a clean energy future.

Recommendations:

- Identify the skills DOE, industry, regulators and workers will need to complete the cleanup mission and develop, build, and operate the next generation of nuclear facilities.
- Work with the private sector on future workforce needs and encourage or incentivize participation in existing STEM and training initiatives.
- DOE should work with contractors to address how workers are and can be retained after a project ends. Items for discussion may include recruitment, training requirements, and the impact the economic viability of a community has on attracting people to nuclear jobs and DOE energy communities.
- Engage with national laboratories to better understand priorities for nuclear development and how to work together to identify workforce needs, to leverage funding resources, and develop coordinated outreach programs for local, state, tribal and regional educational and training.
- Understand how utilities contribute to and participate in the initiative. Items for discussion should include funding opportunities, recruitment, training requirements, and future need and priorities.
- DOE should encourage the support and participation of site and field office leadership in local education events, workforce training programs, and other mutually beneficial opportunities.

- DOE should continue to request appropriations for and expand grants to local educational institutions to train the next generation of DOE workers.

Identify opportunities to work with the community on economic activities that facilitate the DOE/NNSA mission

There are advantages for the communities involved in hosting DOE/NNSA sites. DOE and NNSA should engage the communities to promote those activities that advance both economic welfare and DOE missions.

Expansion of the nuclear energy industry can bring economic opportunities in the form of a skilled workforce, high paying jobs and an expanded tax base. With an aging workforce, DOE and the communities should engage in those economic activities that secure a workforce for future mission needs. Several economic activities can lead to building and maintaining a nuclear workforce.

Recommendations

- Support real and personal property transfers that support community reinvestment, including workforce initiatives.
- Collaborate and communicate with Community Reuse Organization executives and board members and economic development professionals along with local government leadership within communities.
- Evaluate site projects that would facilitate nuclear missions and, at the same time, benefit host communities. These may include infrastructure, education, and commercial initiatives.
- DOE must ensure impacted communities receive resources for educational development, economic diversification, and other programs that demonstrate DOE's commitment to local governments.
- DOE should, upon request, provide local governments with grants for third-party assessments of DOE proposals so communities can independently assess the economic and social impacts.
- DOE and prime contractors should ensure that small local business subcontractors are provided opportunities for 'meaningful work' (work which allows them to grow and diversify their customer base).
- DOE should engage in scoring community commitment plans.

IV. Create a high-level waste and spent nuclear fuel disposal program

In the absence of a permanent geologic repository, ECA's local government members are serving as de facto interim storage sites. While there is support for examining alternative disposal paths for some of this waste, the need for a permanent geologic repository remains.

Trying to develop alternatives to help get waste out of our communities. The need for DOE to move forward with cleanup activities only increases, especially as more nuclear reactors are being decommissioned, and in order to build support for new low-carbon nuclear development and technologies like small-modular reactors.

ECA communities focus on defense nuclear waste. Storage of liquid high-level waste poses a serious threat if left in tanks and containers that are susceptible to corrosion. If federal policymakers clarify how nuclear waste is classified under existing U.S. policy to allow disposal decisions to be based on radiological characteristics – actual risk – rather than the origin, the country can begin to address the growing liability and allow safe and more expedient nuclear waste management and disposal decisions.

Recommendations

- Assessing risk factors early in the process can develop community trust that DOE is being proactive in regard to waste removal.

Continue evaluating alternative disposal options if waste is classified by radiological content rather than origin

ECA supports safe, risk-based alternative disposal paths for waste based on actual radiological characteristics and risk to human health arising from the waste, rather than artificial former policy standards that base waste classification on origin.

Clarifying how waste is classified fits squarely within the DOE initiative of repealing, replacing, or modifying regulations if they impose costs that exceed benefits; there is support within DOE and among its contractors and DOE has already completed technical and programmatic analyses to enable these decisions.

A new high-level waste interpretation, if applied across the nuclear complex, could ultimately:

- Reduce years of DOE operations and risks to current host communities;
- Accelerate Hanford, Idaho, and Savannah River tank retrievals and closures – which decreases risk (moving more waste out of those sites more quickly – thereby decreasing risk to the people that live in the communities);
- Decrease the number, size and duration of storage facilities pending availability of a permanent deep geologic HLW repository; and
- Save taxpayers an estimated \$40 billion or more on DOE’s Office of Environmental Management program’s remaining lifecycle costs.

Recommendations

- DOE should establish a clear classification of high-level waste for purposes of allowing adequate removal and disposal within communities.

Local governments of both current and potential DOE host communities should be engaged to ensure priorities and concerns are addressed throughout any renewed or new waste storage or disposal siting processes.

The engagement of current and potential host communities and their local governments on how to move forward in the absence of a repository program will build trust, reduce the potential for lawsuits, and allow local governments to identify the financial, oversight, and legal terms that will allow them to consent to hosting a nuclear facility as part of a flexible, resilient, and integrated waste management system.

It is imperative that DOE enter into discussions as early as possible with host communities and states to ensure there is a full understanding of the risks and benefits of any siting proposal. The completion of the DOE cleanup mission is vitally important to communities that host government sites and it is critical that impacted host communities, states and regions have the resources and opportunities necessary to participate in planning and provide feedback in the policymaking process. For many communities, trust in DOE has eroded over time and transparency is paramount to our communities' ability to support DOE decisions.

Pursue interim storage in parallel with siting a permanent geologic repository

ECA supports consolidated interim storage. Interim storage must exist alongside a permanent solution and not instead of it.

Recommendations:

- DOE should build on the successful engagement and education of local governments to develop any new nuclear waste facility siting process.
- New DOE leadership should consider new legislation or amendments to current legislation to formalize any new siting process for interim storage or a repository.
- DOE should pursue a consent-based siting approach for determining a permanent repository, ensuring buy-in, trust, and transparency for the host communities.
- Siting processes should prioritize the communities most directly impacted by any new nuclear facility and waste mission.
- Defense high-level waste should be prioritized along with spent nuclear fuel from decommissioned commercial nuclear plants.

V. Support the development of new nuclear technologies

Support development of nuclear missions and projects in communities that want to host the facilities.

ECA member communities host and support the critical nuclear research and development that is underway across the DOE complex – such as advanced nuclear reactors at the Oak Ridge National Laboratory in Tennessee, the production of high-assay low-enriched uranium (HALEU) in Piketon, Ohio; starting the Versatile Test Reactor and the newly Nuclear Regulatory Commission-approved NuScale small modular reactor at Idaho National Laboratory - alongside other first-of-a-kind initiatives like TerraPower, Deep Isolation's solution for nuclear waste storage and disposal, or NDB's battery powered by nuclear waste.

ECA community local governments are eager to fill vital roles, from establishing new U.S.-based manufacturing and supply chains to promoting creation of training programs at local community colleges around existing nuclear sites. Local leaders want to highlight not only what they have done but what they can and want to do to ensure the U.S. is a leader in new nuclear development around the world. ECA, and the local communities involved in pursuing new nuclear facilities, believe the development of new nuclear technologies will play a significant role in advancing

climate change policies over the next several decades. Nuclear offers several benefits to social well-being including, but not limited to, medical isotopes, water desalinization, carbon-free power, and sustainable development. The Administration's goals in tackling climate change align with community goals of being fully engaged in DOE missions and activities. Communities have supported and continue to support nuclear projects pursued by DOE and contractors.

Recommendations:

- DOE should work with local communities in supporting new nuclear projects across the nuclear complex, including support for long-term purchase-power agreements.
- Provide political support in Congress for nuclear energy expansion and the role for communities as potential hosts of new facilities. The discussion may also consider the growing support and role for nuclear energy as part of a strategy to address carbon reductions and climate change.
- If creating a new office within the Administration to focus on climate change, include members from the Office of Nuclear Energy in that office to provide guidance on nuclear energy's role in combating climate change.
- Provide investment tax credits (ITC) for developers of advanced nuclear technology, similar to the Obama Administration's renewable energy ITC.

Collaborate with local communities, colleges/universities, and trade schools to bolster education and STEM programs

ECA supports maximizing Science, Technology, Engineering and Math (STEM) initiative in the communities hosting or adjacent to the U.S. Department of Energy (including NNSA facilities). These are the communities where the scientist, engineers and other workers live and work and whose children attend the local schools. Many of the children in ECA communities, due to the parents' professions, are focused on improving local education.

DOE communities share a common challenge: ensuring future technology R&D and workforce needs can be met to secure innovation and the competitiveness of the U.S. nuclear industry into the future. STEM initiatives, when aligned with economic development goals and educational programs can attract, train and maintain a skilled nuclear workforce in communities across the DOE weapons complex. These programs can also help build a network of nuclear manufacturing capabilities and intellectual expertise while increasing the economic viability of communities that support current and future DOE and NNSA missions and objectives.

Recommendations:

- DOE, NNSA, and their contractors should work with local communities to develop and support STEM curriculum for K-12 education as to secure local, sustained streams of workforce talent able to assist in the decades-long cleanup processes at DOE sites.
- Pursue a view from educators and representatives of the trades to better evaluate, develop, and leverage STEM initiatives and training programs around DOE facilities.

VI. Integrate ECA's Acquisition Reform Recommendations and Principles

Local communities hosting DOE missions should be recognized as faithful customers who have the highest stake in the performance of cleanup contractors

Local governments are responsible for the health and safety of their communities and are thus committed to helping DOE accomplish the safe, effective cleanup of the nuclear weapons complex. ECA urges DOE to continue to address ECA's acquisition reform recommendations and statement of principles. DOE and local communities are best served when there is strong competition for prime contracts and an emphasis on the long-term nature of the acquisition process and work scope. ECA also urges DOE to communicate timeframes, the nature of site projects, and contract work scopes with communities before formal solicitations are released. This will allow for a more informed dialogue and understanding of priorities. Finally, DOE must return to proven contract types that incentivize the safe and speedy cleanup of sites and ensure opportunities for local small businesses and healthy subcontracting.

Recommendations:

- DOE should reaffirm the Community Commitment clause and include requirements for incentivized community engagement as part of evaluating bids.
- Contractors should be encouraged to support local small businesses via subcontracts and other means as a display of good corporate citizenship.
- NNSA and DOE program offices should reconsider use of centralized supply chain management systems that bypass local or small businesses.
- DOE should place emphasis on contract vehicles that have proven successful and beneficial to host communities in the past.

VII. Promote intra-agency cooperation and communication at DOE as the failure to coordinate within DOE leads to delays, confusion and inconsistent decision-making

Lack of intra-agency communication leads to bureaucratic confusion and inconsistency and can slow mission progress at the site level and at headquarters. More efficient and consistent communication between offices at DOE/NNSA will create more unified plans and assure progress for cleanup and nuclear security missions.

Recommendations:

- DOE headquarters officials must ensure that meetings and other communications across offices at both the project and management level occur on a regular basis. This is especially important for sites that have overlapping DOE and NNSA oversight.
- Site managers must ensure that local decisions are made with input from local officials and in coordination with all local DOE programmatic offices.

VIII. Invest in host communities and the DOE complex

DOE infrastructure improvements must be made a priority by the Administration and Congress to ensure the safety of workers, communities, and the country.

DOE's missions are critical to national defense and are important economic drivers in host communities. These missions cannot be accomplished, however, unless problems of aging infrastructure, maintenance backlogs, and deteriorating facilities are addressed. Such improvements should be included in any major infrastructure plan that the Administration pursues.

Recommendations:

- DOE should continue work to modernize the entire national security complex.
- DOE must resolve maintenance and disposition issues across the complex, prioritized by need.
- Create a program within DOE that utilizes intergovernmental support agreements by sharing municipal services with host communities.

Utilize national laboratories for project development and workforce development opportunities

National laboratories are present in several ECA members' communities across the complex. For many, the labs are economic drivers for the local communities. At the same time, states, cities, and counties that host national labs play a critical role in the success of the labs' missions by providing a workforce, municipal services, and other benefits.

Recommendations

- Identify opportunities for communities and national laboratories to work together to identify workforce needs, funding resources, and outreach programs to schools and universities.

Support and fund the Manhattan Project National Historical Park

The Manhattan Project National Historical Park ("Park") will require ongoing DOE attention as many visitor attractions and points of historical interest exist alongside active DOE operations.

The Park was established in November 2015. Congress has directed the National Park Service ("NPS") and DOE to work collaboratively in the development and operation of the Park across its three separate sites: Oak Ridge, TN, Los Alamos, NM, and Hanford, WA. The communities of and around the Park take great pride in the important role they played in World War II through their participation in the Manhattan Project. Their unique stories are now preserved through the Park for the educational benefit of future generations.

As the Park exists alongside retired and active DOE sites and facilities, DOE must remain actively engaged in the Park. The Park is a great communication on the past and current missions of DOE and the importance to our country and the world.

Recommendations:

- DOE should reaffirm its commitment to supporting the Park, preserving historical documents and sites, and cooperating with local communities and NPS.
- DOE's Office of Legacy Management, NNSA and EM must work with the local communities and the NPS to ensure nationally significant sites are included in the Park and accessible to visitors.
- DOE should work with local communities who are interested in aiding the national security effort, especially those communities with the resources to engage in defense projects.