Site Transition Plan Guidance

Goal: The Site Transition Plan (STP) is the primary tool intended to assist in successful closeout or transition of the Office of Environmental Management (EM) site responsibilities to the Office of Legacy Management (LM) for post-closure management. Within this framework, the STP is intended to achieve several specific objectives:

- Ensure efficient transfer of EM activities that remain after physical site completion to the EM Consolidated Business Center (CBC) or other appropriate organization.
- Provide requirements for, and support the preparation of, the Critical Decision-4 (CD-4) documentation for project closeout.
- Establish a common understanding of EM and LM financial, programmatic, and legal responsibilities throughout the transition period.
- Ensure the requirements of the Site Transition Framework (STF) are met.
- Establish requirements for LM post-closure responsibilities.
- Describe the approach to disposition real property, records, and data by EM and LM where appropriate.

It should be noted that the STP should include all work scope that will transition (i.e., to LM, EM, or some other entity) upon completion of EM work at the site.

Explanation of Terms: Transition is viewed as a process. Thus, for EM and LM the transition is the passage from the phase during which engineered, near-term actions are taken to mitigate environmental and human health risks to the next phase where residual risks are maintained in a sustainable safe condition to allow beneficial use. Transfer is the handoff of programmatic and financial responsibility from one program to another. Thus, upon completion, EM closure sites go through *transition* (a process) to achieve *transfer* (a milestone). The transition period ends on September 30th of the fiscal year in which EM completes its mission at the site. This date coincides with the projected transfer of programmatic responsibility for the site to LM.

DOE Order 430.1B Real Property and Asset Management Requirements: EM and LM intend to use two primary documents to achieve transition and comply with the requirements of *DOE Order 430.1B Real Property and Asset Management.* The STP will meet the requirement for a disposition plan and the long-term surveillance and maintenance plan (LTS&M Plan) will meet the Ten Year Site Plan requirement. A site specific STP should include:

- The projected date and end-point criteria for programmatic transfer.
- A summary of transition cost, scope, and schedule including organizational responsibility for major actions.
- Major milestones and deliverables that will be placed under configuration control administered by LM-1 and EM-1.
- A records turnover or retention plan, including the management of FIMS data and information.
- The information necessary to meet the requirements identified in *DOE O. 430.1B* for transfer of real property.

Development Process: The STP is developed using a joint EM-LM team. LM has the lead role in developing the STP with extensive support from EM staff. The STP should be developed two years prior to the planned transfer date. The STP also serves as the formal document for the transfer scope, date, and level of responsibilities, funding and control and custody for the property conveyed. The STP is approved by EM-1 and LM-1.

Use and Update of the STP: After the STP is approved, the critical milestones are placed under configuration control, and STP activities are executed by EM and LM staff. The site

manager, in coordination with the LM Site Transition Coordinator reports progress to EM-1 and LM-1 on a quarterly basis. The STP should be updated periodically by assessing transition progress against the STF requirements. The STP should reflect the latest activities and/or management decisions.

Relationship between the STP and the STF: The STF is the framework for developing the STP and includes a set of requirements that must be met before programmatic transfer of a closure site (see Box 1). The STF serves as the primary tool to evaluate whether all relevant transition activities and end-point criteria have been identified. It should be noted that the STP and the STF will be updated periodically as EM and LM work toward the successful site transition.

Box 1. The Site Transition Framework Establishes Requirements for 10 Areas

1. Authority and Accountability
2. Site Conditions
3. Engineered Controls, Operation & Maintenance Requirements, and Emergency/Contingency Planning
4. Institutional Controls and Enforcement Authorities (Real Property)
5. Regulatory Requirements and Authority
6. Long-Term Surveillance and Maintenance
7. Information and Records Management
8. Public Education, Outreach, Information and Notice
9. Natural, Cultural, and Historical Resource Management
10. Business Functions including Contractor Pensions and Benefits

Organization of the STP: The STP should be structured to address the STF's ten functional areas. Each functional area should include:

- The status of relevant site characteristics at the time the STP is submitted.
- A schedule of key activities and milestones associated with the functional area.
- Key assumptions associated with the transition and/or transfer.
- Risk management activities to address the major transition uncertainties.

Other Characteristics: A typical STP is expected to be 20-30 pages in length; a shorter length may be appropriate for smaller or less complex sites. The STP should address the full transition period. The STP is a management tool and not a regulatory document; it is not enforceable by external parties. However, DOE will provide the STPs to regulators and stakeholders for information upon request. The following items are considered standard for all STPs unless specifically waived:

- Disposition of the EM responsibilities or "Sunset Project."
- Development and approval of the LTS&M Plan.
- The approach to complete regulatory documentation and description of the post-closure regulatory framework.
- Schedule for known or anticipated real property transfer.

The STP and Critical Decision-4: As the site approaches closure, a CD-4 package must be developed in accordance with the *DOE O. 413.3 Program and Project Management for Acquisition of Capital Asset.* A CD-4 package documents the completion of the EM mission at the site and validates the successful execution of the STP to the transfer point. Thus the CD-4 package represents agreement between EM and LM on the status of the site and associated remaining activities at the time of transfer. Actions in the STP that remain at transfer are documented in the CD-4 package. The CD-4 package is signed by the Under Secretary for Energy, Science and Environment.

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