

## **CHAPTER 2**

# **Comment Documents**



## **2.0 COMMENT DOCUMENTS**

This chapter is a compilation of all the documents the NNSA received on the Draft SRS Pit Production EIS during the public comment period, including comments received after close of the period that NNSA was able to consider. First the campaign comment documents are presented, followed by the transcripts of the public hearing and the comment documents submitted by groups and then individuals. All comment documents are notated to indicate specific comments contained in the document. On each document, the first number represents the comment number within that document and the second number represents the issue code (from Chapter 1, Table CR-1) assigned to this comment. This number can be used to locate the response for this comment in Chapter 3.





## Campaign Letter #1

Mr. Dan Brouillette  
Secretary of Energy  
United States Department of Energy  
1000 Independence Ave., SW  
Washington, D.C. 20585  
[The\\_Secretary@hq.doe.gov](mailto:The_Secretary@hq.doe.gov)

Ms. Lisa E. Gordon-Hagerty  
Administrator  
National Nuclear Security Administration  
1000 Independence Ave. SW  
Washington, D.C. 20585  
[Lisa.Gordon-Hagerty@nnsa.doe.gov](mailto:Lisa.Gordon-Hagerty@nnsa.doe.gov)

Mr. Bruce M Diamond  
General Counsel  
National Nuclear Security Administration  
1000 Independence Ave. SW  
Washington, D.C. 20585  
[Bruce.Diamond@nnsa.doe.gov](mailto:Bruce.Diamond@nnsa.doe.gov)

April 21, 2020

Request for Extension of Comment Period on the Draft Environmental Impact Statement  
for Plutonium Pit Production at the Savannah River Site in South Carolina

Dear Secretary Brouillette, Administrator Gordon-Hagerty and Mr. Diamond,

I am writing to you concerning the "Draft Environmental Impact Statement for Plutonium Pit Production at the Savannah River Site in South Carolina" and the public comment period allotted to it.

Notice of the availability of the draft EIS was published in the Federal Register on April 3, 2020 and a 45-day public comment period was stipulated, to May 18. I believe that this comment period is inadequate given the unusual circumstances we are all facing.

Given the gravity of the matter at hand - review of the impacts of introducing fabrication of plutonium pits for new-design and refurbished nuclear weapons to a DOE site never before involved in this work (Savannah River Site) - and due to the impacts of the COVID-19 pandemic to the public and to the U.S. Department of Energy alike, **I hereby request a 45-day extension of the comment period.**

I believe that a 45-day comment-period extension is prudent and will afford additional time for groups and individuals to more properly review the draft document and respond. I believe that the current timeline for the project will not be impacted by extending the comment period. Additionally, as the comments on the document will hold an important place in the record of the National Environmental Policy Act process on pit production the comment period must be extended.

I am aware that the DOE's National Nuclear Security Administration has extended the comment period for on a related document, the draft Supplement Analysis to the 2008 Site-wide Environmental Impact Statement (SWEIS) for Continued

Operations of Los Alamos National Laboratory (LANL) This extension, for which I thank NNSA, sets a precedent for extension of other comment periods being managed by NNSA during the pandemic crisis.

Further, I am aware of an April 8 letter sent by U.S. Senators to Mr. Russell T. Vought, Acting Director, U.S. Office of Management and Budget, to "Instruct all federal agencies to indefinitely extend all open or announced upcoming public comment periods for rulemakings and administrative actions not related to the COVID-19 pandemic response." Members of the U.S. House of Representatives have also voiced a similar request concerning extension of comment periods.

I extend my support for actions by DOE to protect the health and safety of all DOE staff during the pandemic crisis and hope no further staff have health impacts due to this unprecedented situation.

In conclusion, **I request an extension of the comment period to approximately June 30**. Thank you for your response to me at the email address below.

Sincerely,

Cc: Ms. Jennifer Nelson, NEPA Compliance Officer, National Nuclear Security Administration Savannah River Field Office, P.O. Box A, Aiken, SC 29802; email: [NEPA-SRS@srs.gov](mailto:NEPA-SRS@srs.gov). Please include this letter in the record of the draft EIS.

1/4-a  
(Cont'd)

## Campaign Letter #2

Dear Ms. Nelson, Ms. Slack, Mr. Diamond, and Mr. Costner, et al,

Leaders in both houses of Congress have called for all public comment periods to be extended indefinitely during the national COVID-19 emergency, and for public hearings to be scheduled after the national emergency is lifted.

I agree with the twenty-four Senators who wrote:

“the American public is not only legally entitled to a meaningful opportunity to participate in these important proceedings; their participation is crucial to ensuring that agencies’ work is carried out effectively. The public is an invaluable source of expertise for agency decision-makers, and their ability to weigh in on agency decisions advances the good government goals of accountability. Yet, such meaningful participation is an impossibility for tens of millions of Americans during this pandemic emergency period. We cannot reasonably expect the public to redirect attention from protecting themselves and families to comment on federal agency rules and proceedings that while important, are not related to the crisis at hand or its response.”

In light of the COVID-19 national emergency, we demand that the Department of Energy and National Nuclear Security Administration immediately institute and indefinite extension of all public comment periods and the rescheduling of all public hearings and meetings until such time as the national emergency is lifted and the public is able to devote its attention to these issues. Please note that "virtual" public hearings and meetings are not acceptable to us; in these COVID-19 times, they inevitably exclude low-income and unemployed people who no longer have access to public internet or can not afford cell phone cards.

1/4-a.1

2/4-b

The issues dealt with in the current NEPA analyses at Los Alamos, Savannah River and Oak Ridge are of great importance not only to the residents living near those facilities but to the nation as a whole. In this time of national emergency, though, people are necessarily more concerned with basic issues of health and safety—paying bills, putting food on the table, the health and safety of family members and neighbors. We are putting on masks to go to the grocery store and worrying when we come home about whether we have been infected. We are making choices about which bills to pay and which to defer. We have no idea when we will be able to return to work, draw our next paycheck, or attend religious services. Some of us have been required to say our last good-byes to loved ones via phone or Face Time or not at all. We have seen our retirement funds decimated. This is what a national emergency looks and feels like where we live.

It is imperative that DOE and NNSA recognize this and hit the pause button on these elective NEPA processes until such time as we are able to resume a normal life without the looming uncertainty of this national emergency.

Thank you for your consideration of our request.

Sincerely,

### Campaign Letter #3

TO:  
Ms. Jennifer Nelson  
NEPA Document Maae  
National Nuclear Security Administration  
Savannah River Field Office  
P.O. Box  
Aiken, SC 29802

Dear Ms. Nelson,

The National Environmental Policy Act (NEPA) requires analysis of ALL IMPACTS of a proposed action in an Environmental Impact Statement (EIS) but the EIS for Plutonium Pit Production at Savannah River Site (SRS) fails to analyze the impact of its end product, a nuclear weapon, the impact of which is wholesale environmental destruction. The EIS is also deficient in its failure to analyze the impacts on national security from starting a new nuclear arms race or from insider sabotage and malevolent acts which a volatile plutonium facility would attract.

1/4-g  
2/2-g  
3/6-l.1

It has been almost 30 years since the Cold War's nuclear arms race ended, with the U.S. the most heavily armed of all nations. The International Court of Justice has outlawed nuclear weapons, and a U.N. Treaty to Abolish Nuclear Weapons is in the process of being ratified having already garnered 36 of 50 signatures required. The U.S. is out of step with world trends and should be showing leadership in nuclear dismantlement and disarmament, instead of starting a new nuclear arms race.

4/2-g

On the heels of failure to complete a MX plutonium fuel factory at SRS, a Department of Energy (DOE) project which wasted 17 years and billions of taxpayer dollars, DOE is illegally pursuing its intent to convert the unfinished MOX factory to make plutonium pits for nuclear weapons with publication of this EIS. It amounts to a theft of public trust and funding to switch tracks from a nuclear security and environmental management program to a nuclear weapons manufacturing program.

5/2-h

The idea of converting SRS from a plutonium clean-up site into manufacturing nuclear warhead triggers has been proposed, studied, and rejected three times. Plutonium pit production at SRS was proposed in 1989 in the "Complex 21" proposal, in 2003 as the "Modern Pit Facility" and again in 2007 as "Complex 2030." In each instance, the pit production facility failed to garner public acceptance and was abandoned. Los Alamos has been unable to produce pits, and for the 4th time in 30 years, plutonium pit production at SRS is proposed, this time to convert the failed MOX plutonium fuel factory at SRS to plutonium pit production. The time is ripe for a new strategy: Plutonium immobilization utilizing 35,000,000 gallons of highly radioactive liquid waste stored at SRS, a concept which was considered in the Programmatic Plutonium EIS which accompanied the MOX program and which should be considered as the Preferred Alternative in the current EIS.

6/4-e

Up to 13 tons of plutonium are stored at SRS, the leftovers from operations at Rocky Flats, Los Alamos, Hanford, and Lawrence Livermore. The plutonium at SRS, called "junk plutonium" by critics, is in the form of plutonium oxide "dust," metal scraps, and contaminated objects, and is stored in thousands of small canisters at SRS. The junk plutonium at SRS was not suitable for MOX fuel and is not suitable for pits. To convert the abandoned MOX factory to pit production would require importing more plutonium to SRS and would block the option to repurpose the MOX factory to responsible management of the plutonium already stranded in South Carolina by converting it to plutonium immobilization. This is a problem which is not contemplated in the EIS.

National security will be best served with a plutonium immobilization program to place the plutonium already at SRS into the classification process at SRS's Defense Waste Processing Facility (DWPF). This immobilization process utilizes the intense, long-lived radioactivity of the tank waste as a security barrier for the junk weapons-grade plutonium, thus satisfying both waste remediation and non-proliferation goals.

Plutonium immobilization is the best option for national security and for SRS. Plutonium immobilization is the most efficient and cost-conscious way to solve both the radioactive waste problem and the plutonium security problem. Plutonium immobilization is the preferred use for the partially complete MOX plutonium fuel factory. A plutonium immobilization program will be a long-term federally funded program, bringing millions of dollars into the economy, employing South Carolinians and Georgians, and ultimately protecting the low country environment while aiding global security. We urge NNSA/DOE to provide the necessary leadership to get the plutonium immobilization option restored and funded by including it in the EIS.

Please send me a copy of the final EIS and include me in future public hearings about plutonium disposition at SRS.

Respectfully submitted,

6/4-e  
(Cont'd)

### Campaign Letter #4

**From:** systems@idsites.com <systems@idsites.com>  
**Sent:**  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>  
**Subject:** [EXTERNAL] Comments on Proposed Plutonium Pit Production at Savannah River Site, Draft EIS

**Name**

**Company Name**

**Job Title**

**Phone Number**

**Email Address**

**Mailing Address**

**Comments**

VIA ELECTRONIC MAIL  
Ms. Jennifer Nelson  
NEPA Compliance Officer  
National Nuclear Security Administration  
Savannah River Field Office, P.O. Box A  
Aiken, South Carolina 29602  
[NEPA-SRS@srs.gov](mailto:NEPA-SRS@srs.gov)

Re: Comments on Proposed Plutonium Pit Production at Savannah River Site, Draft EIS

Dear Ms. Nelson:

I am respectfully submitting the following comments for consideration in response to the Department of Energy (DOE) National Nuclear Security Administration (NNSA) preparation of its environmental impact statement (EIS) for plutonium pit production at the Savannah River Site (SRS).

I support NNSA's proposal to repurpose the Mixed Oxide Fuel Fabrication Facility (MFFF) at SRS to produce plutonium pits, restoring an imperative manufacturing capability for our nation. The EIS shows that SRS has the talent and capacity to conduct this essential nation defense mission and can do so safely, efficiently, and with a minimal environmental impact. The Site has existing nuclear processing infrastructure, plus significant land buffer zones, that make it a secure, ideal location for this project. SRS has a well-established record of responsibility operating safely for 70 years, and Site experience in repurposing site facilities for new missions (K Area, L Basin, H Canyon) prove SRS can repurpose the MFFF production facilities and get a return on taxpayer investment. Finally, SRS can execute this mission while protecting the environment. SRS has a world-class manufacturing safety culture, and can operate this new mission in compliance with all environmental laws and regulations.

Selecting SRS for this effort will meet the objective in the 2018 Nuclear Posture Review, to provide "an effective, responsive, and resilient nuclear weapons infrastructure" for the enduring capability and capacity for both SRS and Los Alamos National Laboratory to produce no fewer than 80 plutonium pits per year by 2030.

I am proud to support the consideration and selection of SRS for the plutonium pit production mission, and commend DOE and SRS for its continued focus on safety and environmental stewardship in South Carolina in service to our nation.

Thank you for the opportunity to provide these comments.

1/5-b



## Campaign Letter #5

Ms. Jennifer Nelson  
NEPA Compliance Officer  
National Nuclear Security Administration  
Savannah River Field Office, P.O. Box A  
Aiken, South Carolina 29802  
[NEPA-SRS@srs.gov](mailto:NEPA-SRS@srs.gov)

Re: Comments on the Draft EIS on the Proposed SRS Plutonium Bomb Plant

Dear Ms. Nelson:

I hereby submit the following comments on the proposed "Savannah River Plutonium Processing Facility (SRPPF)" and ask that they be made part of the official record.

I am concerned about the proposal to expand the role of the Savannah River Site into the production of plutonium pits, a job with which the site has no experience. I raise the following issues to be responded to in any final EIS:

Pit production would produce a host of chemical and nuclear waste streams and it is unacceptable that dumping of low-level nuclear waste in unlined trenches at SRS is being considered. Waste management at SRS has been irresponsible and no new production should be undertaken until past problems are corrected.

Pit production could distract from the main mission of the site and the largest amount of funding - cleaning up tens of millions of gallons left over from production of plutonium and nuclear weapons materials.

Producing new-design nuclear weapons, the justification of which is doubtful, and replacing pits in the entire stockpile, which appears to be the unstated goal, could stimulate a costly new nuclear arms race.

The draft EIS waves off "reuse" of existing pits - some 15,000 or more of them are in storage at DOE's Pantex site in TX - and it is imperative that pit reuse be thoroughly analyzed.

The discussion of the exact technology to be used to purifying plutonium is lacking, as are the environmental and health impacts associated with this.

As plutonium was stranded at SRS when the MOX project collapsed, what would prevent more plutonium ending up at SRS if the pit project was terminated mid-stream or halted due to an accident?

Before "repurposing" of the ill-constructed MOX plant is considered, there must be investigations into potential waste, fraud, abuse and mismanagement at the MOX debacle.

I support preparation of an over-arching Programmatic Environmental Impact Statement (PEIS) which would examine the need for expanded pit production and the role of DOE sites across the country. The PEIS must be completed before the final EIS on SRS pit production is finalized.

In conclusion, I support the "no action" alternative whereby the poorly constructed MOX facility would not be converted to plutonium pit production.

Thank you for considering my views and for responding to them.

1/5-a

2/6-j.6

3/6-j.8

4/2-g

5/3-a

6/3-g

7/6-j.2

8/3-j

9/4-f

## Campaign Letter #6

TO:  
Ms. Jennifer Nelson  
NEPA Document Manager  
National Nuclear Security Administration  
Savannah River Field Office  
P.O. Box A  
Aiken, SC 29802

Dear Ms. Nelson,

The proposed Plutonium Pit Production Factory planned for the Savannah River Site (SRS) is both unnecessary and dangerous. The Cold War ended long ago. Both then and now, plutonium is a dangerous substance that wreaks havoc in its production, storage, disposal and ownership. The U.S. has ample history of horrors from radioactive waste problems. We don't need more! The current coronavirus pandemic is an example of our need to work together as a global community. May we join together for a positive future together with no nuclear weapons, no radioactive pollution and waste, and no threat of war.

1/5-a

The National Environmental Policy Act (NEPA) requires analysis of ALL IMPACTS of a proposed action in an Environmental Impact Statement (EIS) but the EIS for Plutonium Pit Production at Savannah River Site (SRS) fails to analyze the impact of its end product, a nuclear weapon, the impact of which is wholesale environmental destruction. The EIS is also deficient in its failure to analyze the impacts on national security from starting a new nuclear arms race or from insider sabotage and malevolent acts which a volatile plutonium facility would attract.

2/4-g  
3/2-g  
4/6-1.1

It has been almost 30 years since the Cold War's nuclear arms race ended, with the U.S. the most heavily armed of all nations. The International Court of Justice has outlawed nuclear weapons, and a U.N. Treaty to Abolish Nuclear Weapons is in the process of being ratified having already garnered 37 of 50 signatures required. The U.S. is out of step with world trends and should be showing leadership in nuclear dismantlement and disarmament, instead of starting a new nuclear arms race.

3/2-g  
(Cont'd)

On the heels of failure to complete a MOX plutonium fuel factory at SRS, a Department of Energy (DOE) project which wasted 17 years and billions of taxpayer dollars, DOE is illegally pursuing its intent to convert the unfinished MOX factory to make plutonium pits for nuclear weapons with publication of this EIS. It amounts to a theft of public trust and funding to switch tracks from a nuclear security and environmental management program to a nuclear weapons manufacturing program.

5/2-h



The idea of converting SRS from a plutonium clean-up site into manufacturing nuclear warhead triggers has been proposed, studied, and rejected three times. Plutonium pit production at SRS was proposed in 1989 in the "Complex 21" proposal, in 2003 as the "Modern Pit Facility" and again in 2007 as "Complex 2030." In each instance, the pit production facility failed to garner public acceptance and was abandoned. Los Alamos has been unable to produce pits, and for the 4th time in 30 years, plutonium pit production at SRS is proposed, this time to convert the failed MOX plutonium fuel factory at SRS to plutonium pit production. The time is ripe for a new strategy -- Plutonium immobilization utilizing 35,000,000 gallons of highly radioactive liquid waste stored at SRS, a concept which was considered in the Programmatic Plutonium EIS which accompanied the MOX program and which should be considered as the Preferred Alternative in the current EIS.

Up to 13 tons of plutonium are stored at SRS, the leftovers from operations at Rocky Flats, Los Alamos, Hanford, and Lawrence Livermore. The plutonium at SRS, called "junk plutonium" by critics, is in the form of plutonium oxide "dust," metal scraps, and contaminated objects, and is stored in thousands of small canisters at SRS. The junk plutonium at SRS was not suitable for MOX fuel and is not suitable for pits. To convert the abandoned MOX factory to pit production would require importing more plutonium to SRS and would block the option to repurpose the MOX factory to responsible management of the plutonium already stranded in South Carolina by converting it to plutonium immobilization. This is a problem which is not contemplated in the EIS.

National security will be best served with a plutonium immobilization program to place the plutonium already at SRS into the glassification process at SRS's Defense Waste Processing Facility (DWPF). This immobilization process utilizes the intense, long-lived radioactivity of the tank waste as a security barrier for the junk weapons-grade plutonium, thus satisfying both waste remediation and non-proliferation goals.

Plutonium immobilization is the best option for national security and for SRS. Plutonium immobilization is the most efficient and cost-conscious way to solve both the radioactive waste problem and the plutonium security problem. Plutonium immobilization is the preferred use for the partially complete MOX plutonium fuel factory. A plutonium immobilization program will be a long-term federally funded program, bringing millions of dollars into the economy, employing South Carolinians and Georgians, and ultimately protecting the low country environment while aiding global security. We urge NNSA/DOE to provide the necessary leadership to get the plutonium immobilization option restored and funded by including it in the EIS.

Please send me a copy of the final EIS and include me in future public hearings about plutonium disposition at SRS.

Respectfully submitted,

6/4-e

## Campaign Letter #7

### **Re: Public Comment on the Draft Environmental Impact Statement (DEIS) for a New Plutonium Bomb Production Facility at the Savannah River Site in South Carolina**

Dear Ms. Nelson and NNSA:

I am submitting the following comments on the proposed Savannah River Site Plutonium Processing Facility intended for the production of plutonium bomb cores, or "pits." I ask that my comments be made part of the record.

#### **1. A Programmatic Review of the Full Hazards of Pit Production is Necessary**

The National Nuclear Security Administration's (NNSA) plan to expand U.S. plutonium pit production to 80 or more new bomb cores per year relies on two production facilities, the Savannah River Site in SC and the Los Alamos Lab in NM.

Further, NNSA has listed seven more sites that are integral to its plan to expand pit production. They are: the Waste Isolation Pilot Plant in NM, the Lawrence Livermore National Lab in CA, the Nevada Nuclear Security Site, the Kansas City Plant, the Y-12 Complex in TN, the Pantex Plant in TX, and the Sandia National Lab in NM and CA. This totals nine facilities scattered across the map.

Instead of looking at the full picture, the NNSA has inappropriately fragmented its environmental review. This DEIS, which focuses solely on the Savannah River Site, is the *only* Environmental Impact Statement process that NNSA is presently undertaking on this project.

This situation must be remedied. Prior to issuing a final DEIS on the Savannah River Site, a comprehensive nationwide review of all of the interlocking risks, including transportation, should be prepared.

Therefore, I add my voice to that of Tri-Valley CAREs and other public interest groups to support preparation of an overarching Programmatic Environmental Impact Statement (PEIS) that would examine the "purpose and need" for expanded pit production as well as its potential impacts on communities all across the country.

#### **2. A "Hard Look" at Alternatives is Required**

NNSA's plan to expand pit production is being driven by a new warhead under development at the Lawrence Livermore National Lab, the W87-1.

According to public documents from NNSA, the Government Accountability Office and other agencies, this fully new weapon design will involve a novel plutonium pit, unlike anything in the stockpile or in storage. This is a choice. The final EIS must analyze an alternative scenario in which the agency foregoes new-design pits. How many newly produced pits would be needed in 2030 (the due date for both the new bomb plant and the W87-1 warhead) if not for new design pits? Unfortunately, the DEIS dodges this issue.

Similarly, the DEIS is flawed because it does not adequately analyze a reasonable alternative involving the "reuse" of existing pits. There are some 15,000 to 20,000 plutonium pits in storage at the Pantex Plant, with lesser quantities stored elsewhere. Pit reuse is a proven technology. The final PEIS must fully consider the role pit reuse could play before rushing full speed ahead with a new bomb plant at the Savannah River Site as well as plans to expand pit production at Los Alamos.

2/3-b  
3/3-a

Moreover, the DEIS does not address the role of novel warhead design in stimulating a dangerous, costly new global arms race. The agency cannot ignore the directly related cause and effect of developing new weapons and producing new pits for them. The potential impacts of spurring nuclear proliferation must be seriously considered.

### 3. Health Hazards to Workers and the Public Must Be More Fully Considered

Industrial scale plutonium pit production last took place at the Rocky Flats Plant in CO. It was shut down in 1989 following a raid by the FBI environmental crimes unit and the EPA. A full analysis of the Rocky Flats experience is lacking in the DEIS and must be included in the final EIS.

4/2-i

Plutonium fires at Rocky Flats created airborne pollution for miles around the site, reaching nearby towns and even the City of Denver. The full impacts of a plutonium fire at the Savannah River Site must be included in the final EIS.

5/6-1.2

The analysis must include site workers, first responders, and communities near the Savannah River Site, including Barnwell, SC and Shell Bluff, GA. The residents of these communities are primarily low-income and historically disadvantaged people of color. What is the plan to safeguard them? What about workers?

6/6-i.7  
7/6-i.2

The DEIS also lacks other information needed to appropriately assess risks. The process for producing pits at the Savannah River Pits must be better defined in the final EIS. Similarly, a thorough discussion of the specific technology to be used to purify plutonium for new pit production must be included in the final EIS, with a full accounting of its potential health impacts.

8/6-p.1  
9/6-k.3

### 4. Environmental Hazards Must be More Fully Considered

Pit production at the Savannah River Site would produce a host of chemical and nuclear waste streams. The DEIS shortchanges the analysis of their risks. Is dumping of low-level nuclear waste in unlined trenches being considered? Waste containment and management at the Savannah River Site have been problematic; the site was placed on the EPA "Superfund" list in 1989. The final EIS must comprehensively analyze the impacts of new production alongside the leaking wastes already in the environment.

10/6-j.6

Shouldn't past pollution be remedied before new wastes are heaped on top of the old? This fundamental question is not fully answered in the DEIS. Indeed, pit production could distract from the main mission of the Savannah River Site (and its largest source of federal funding); namely, cleaning up tens of millions of gallons of waste products left over from past production of plutonium and nuclear weapons materials at the site.

11/6-j.8

Please acknowledge receipt of my comments. Thank you for considering my views and for responding to them in the final EIS.

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 5

1 have a written document you'd like to submit, send it in via  
2 e-mail or postal mail using the address shown on the screen.  
3 Each comment will be considered equally by the NNSA. You may  
4 submit comments by e-mail or U.S. mail any time until the  
5 close of the comment period on June 2, 2020. There is no  
6 limitation on the number or length of comments an individual  
7 may submit.

8 If you're having technical difficulties, please call  
9 WebEx technical support at 1866-779-3239. Remember the time  
10 limit and focus your comments on the Plutonium Pit Production  
11 draft EIS. When you have 1 minute remaining, I'll signal you  
12 to summarize your remaining comments as quickly as possible.

13 Our first speaker will be Gary Bunker, followed by Greg  
14 Mello, and Jason Stapleton. Mr. Bunker?

15 MR. BUNKER: Good evening. I am Gary Bunker, Chairman  
16 of the Aiken County Council, spelled G-a-r-y B-u-n-k-e-r.  
17 Thank you very much for the opportunity to speak with you  
18 this evening on the Draft Environmental Impact Statement for  
19 Plutonium Pit Production at the Savannah River Site. The  
20 flexibility shown in the NNSA's decision to hold a virtual  
21 online public hearing is commendable, given the ongoing  
22 COVID-19 pandemic.

23 For 70 years, Aiken County and surrounding communities  
24 hosted the Savannah River Site. During the Cold War,  
25 thousands of local citizens forged the materials necessary

1/5-b

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 6

1 for our strategic nuclear deterrent. This material  
2 production, including plutonium, prevented the Cold War from  
3 turning hot and brought the world an unprecedented period of  
4 general peace. Now our country is unable to produce the  
5 components, specifically plutonium pits, necessary to support  
6 our nuclear deterrent. Without this ability, strategic  
7 superiority will eventually shift to another power. And can  
8 we guarantee that this superiority will be in friendly hands?

9       The 2018 Nuclear Posture Review further documented the  
10 urgency of this mission. It makes sense to build these pits  
11 in two locations, at Los Alamos and at Savannah River Site.  
12 Redundancy in this mission to manufacture 80 pits per year  
13 represents flexibility, added security, and reduced risk. A  
14 production mission of this importance of magnitude should be  
15 located at the Savannah River Site, given its superior  
16 nuclear material and chemical manufacturing experience,  
17 conduct of operations, analytical chemistry, engineering  
18 expertise, waste processing, supporting infrastructure,  
19 physical buffer zones, and world-class safety culture.

20       By repurposing the MOX facility, scheduled risk could be  
21 reduced in bringing this production back on line. And the  
22 experienced workforce and aggressive SRS-related training  
23 initiatives at local institutions of higher education are an  
24 additional plus.

25       On January 9, 2018 and March 6, 2019, the Aiken County

1/5-b  
(Cont'd)

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 7

1 Council passed unanimous bipartisan resolutions supporting  
2 the Plutonium Pit Production facility at SRS. The Aiken  
3 County Council found that the plutonium associated with pit  
4 production is a national asset and will have beneficial use  
5 in our country's nuclear deterrence. And it endorsed --

6 MS. BOLTZ: You have 1 minute.

7 MR. BUNKER: And it endorsed the National Nuclear  
8 Security Agency's decision to use SRS as one of the two  
9 locations for this critical mission. For these reasons, I  
10 support the preferred alternative of repurposing the mixed-  
11 oxide fuel fabrication facility into the Savannah River  
12 plutonium processing facility. This alternative is  
13 consistent with the 2018 Nuclear Posture Review and it makes  
14 sense from the environmental, economic and technical  
15 perspectives.

16 Thank you for this opportunity to submit comments.  
17 Aiken County continues to support the national security  
18 missions at the Savannah River Site. Thank you.

19 MS. BOLTZ: Thank you. Our next speaker is Greg Mello,  
20 followed by Jason Stapleton, and then Sarah Cohen. Mr.  
21 Mello?

22 MR. MELLO: Yes. My name is Greg Mello. I'm with the  
23 Los Alamos Study Group in Albuquerque, New Mexico. I wanted  
24 to -- I will submit written comments as well. The impacts of  
25 both alternatives considered in this EIS are going to be

1/5-b  
(Cont'd)

1/3-f

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 8

1 significant in and around Los Alamos National Laboratory as  
2 well as at Savannah River Site. Those impacts are not  
3 analyzed in the draft EIS and nor have they been analyzed in  
4 any past or any other present EIS. Oddly, in this draft EIS,  
5 the no-action alternative will have markedly larger  
6 environmental impacts than the preferred alternative.

7 This is upside-down of how it usually is. This  
8 signifies a few things; that the no-action alternative is  
9 inadequate or has been inappropriately chosen; and number  
10 two, that neither the engineering constraints nor the impacts  
11 in and around LANL are as yet understood by NNSA. And once  
12 they are understood, they can be compared with the impacts  
13 that are being developed in this EIS.

14 NNSA has no reality-based environmental analyses of pit  
15 production at LANL, which is a foundation of this EIS. This  
16 EIS references supplement analyses, which in turn reference  
17 older environmental impact statements, which are not even  
18 accurate as to the number of Hazard Category 2 nuclear  
19 facilities that are present at LANL. There is one, not two.

20 Symbolic, given the time limits -- I would just like to  
21 say that it's symbolic of the difference in impact expected  
22 from this activity at the two sites that the distance from  
23 the Los Alamos main plutonium facility to residential areas  
24 where people live is 0.6 miles. Here it is 6 miles at  
25 Savannah River Site.

1/3-f  
(Cont'd)



IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 9

1 The LANL site has many other engineering constraints as  
2 well as significant environmental justice impacts. And those  
3 are some of the reasons that the no-action alternative has  
4 very large impact. We think that NNSA should consider three  
5 additional alternatives. First, no war-reserve pit  
6 production, although qualification pits could be built. This  
7 is a reasonable alternative because it has been NNSA policy  
8 and practice in all but 4 years since 1989 and for other  
9 reasons.

1/3-f  
(Cont'd)

10 MS. BOLTZ: You have 30 seconds.

11 MR. MELLO: War-reserve pit production could go up to 20  
12 pits per year at LANL and this is another form of no-action  
13 alternative. Or pit production could be delayed once the  
14 SRPPF is built. We support broadening the EIS in the ways  
15 mentioned. We appreciate the opportunity for comment. And  
16 we don't think extension of comment period is going to be  
17 needed. Thank you very much and appreciate you holding this  
18 hearing.

2/3-e

19 MS. BOLTZ: Thank you. Our next speaker is Jason  
20 Stapleton, followed by Sarah Cohen, and Priscilla Preston.  
21 Mr. Stapleton?

22 MR. STAPLETON: Thank you. Good evening, everyone. My  
23 name is Jason Stapleton and I am the Mayor of the Town of  
24 Williston in Barnwell County, South Carolina. My name is  
25 spelled J-a-s-o-n S-t-a-p-l-e-t-o-n.

1/5-b

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 10

1 I want to thank NNSA for allowing this time for public  
2 comment. I would like to express my support for the Savannah  
3 River Site for potential plutonium processing mission. I  
4 think this is a critical mission for our country at this  
5 time. I feel that SRS is suited to handle this operation.  
6 With the existing nuclear processing infrastructure and the  
7 decades of safe nuclear waste management, I believe that SRS  
8 can manage this mission in a safe environmentally responsive  
9 manner. SRS has a dedicated and highly-skilled workforce and  
10 has a remarkable culture of safety.

11 I cannot express enough how much SRS means to our  
12 community, their economic impact, their financial commitment  
13 to the area and their employees' commitment to volunteering  
14 in the surrounding communities. The Savannah River Site's  
15 influence is immeasurable. This impact goes far beyond what  
16 many people see or know. And the plutonium processing  
17 mission will only enhance the site's positive effect on our  
18 community.

19 Thank you again for this opportunity to offer my support  
20 for Plutonium Pit Production at the Savannah River Site. I  
21 hope each of you have a wonderful evening.

22 MS. BOLTZ: Thank you. Our next speaker is Sarah Cohen,  
23 followed by Priscilla Preston, and then Tammy Shepherd.  
24 Sarah Cohen?

25 MS. COHEN: Hi. My name is Sarah Cohen. I'm the

1/5-b  
(Cont'd)

1/5-b

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 11

1 Director of Government Affairs at the South Carolina Chamber  
2 of Commerce. And as a representative of the chamber and  
3 someone who grew up in North Augusta, I'm speaking today in  
4 support of NNSA's proposal to repurpose the MFFF at SRS to  
5 produce plutonium pit.

6 As has already been mentioned, this is a matter of both  
7 national security and needed economic development in the  
8 area. As we know, this project was deemed imperative to  
9 national security in 2018 and it is my hope this important  
10 national security need can be fulfilled by the great people  
11 of South Carolina.

12 Additionally, if this project was brought to SRS, as  
13 estimated, as has already been said, that thousands of new  
14 job will be created. During these uncertain times of COVID-  
15 19, I can think of few better things than creating jobs,  
16 especially with so many people currently unemployed and our  
17 unemployment levels so high.

18 SRS is the clear and smart choice for this project, as  
19 they've had a long history of making the world a safer and  
20 better place. I know this personally in firsthand. My  
21 grandfather and great grandfather both worked at SRS for many  
22 years and decades and were proud of the work they did there  
23 to help defend this country. I see this project as an  
24 extension of their work. And I once again reiterate the  
25 South Carolina Chamber's support of this project. That's it.

1/5-b  
(Cont'd)

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 12

1 MS. BOLTZ: Okay. Thank you. We have -- actually  
2 Congressman Rick Allen has joined us and we are going to  
3 recognize elected officials as we do typically at a public  
4 hearing which we hold in person. Congressman Allen, please  
5 go ahead.

6 MR. ALLEN: Yes. Can you hear me?

7 MS. BOLTZ: Yes.

8 MR. ALLEN: Okay. Great. Well, it's good to be with  
9 you. And thank you for holding this meeting tonight. I'm  
10 Rick Allen. I'm a member of Congress, representing Georgia's  
11 12th District, which includes Augusta and the CSRA. Thank  
12 you for this opportunity to share my comments that I  
13 submitted to NNSA regarding the draft Environmental Impact  
14 Study, or EIS, for the Savannah River Plutonium Processing  
15 Facility at Savannah River Site.

16 As one-third of the Savannah River Site workforce  
17 resides in my district, the future of the site and its  
18 missions are important to me, our community, and we stand  
19 ready to meet the workforce needs necessary for this new  
20 mission. Per the 2018 Nuclear Posture Review, the United  
21 States must provide the ability to produce no fewer than 80  
22 plutonium pits by 2030. A two-site approach ensures  
23 resiliency with the Savannah River Site being a prime  
24 location to assist meeting the mission due to its long  
25 history of safe and successful nuclear waste management as

1/5-b

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 13

1 well as its work with plutonium in our nuclear weapons  
2 infrastructure.

3       The former mixed oxide fuel fabrication facility  
4 specifically would be an optimal site for the production of a  
5 minimum of 50 pits per year due to the readymade structure  
6 that already meets DOE requirements and would only require  
7 minimal modifications as opposed to the construction of a new  
8 facility. Moving forward with a no-action alternative would  
9 jeopardize our national security. I want to thank NNSA  
10 Administrator Lisa Gordon-Hagerty for her work on this and I  
11 agree with the assessment of the draft EIS that we should  
12 continue quickly moving forward with the two-site solution  
13 for Plutonium Pit Production, specifically at the Savannah  
14 River Site and Los Alamos National Laboratory.

15       Plutonium pit production is critical to our national  
16 security and will be an enduring mission at the site for  
17 years to come. Thank you again for your time and  
18 consideration of my comments.

19       MS. BOLTZ: Thank you, Congressman. Our next speaker is  
20 Priscilla Preston, followed by Tammy Shepherd, and then  
21 Suzanne Jackson. And if you have already made your comment,  
22 please remember to un-raise your hands. Thank you.  
23 Priscilla Preston?

24       MS. PRESTON: Yes. My name is Priscilla Preston and I'm  
25 speaking as an individual tonight, although I'm a member of

1/5-b  
(Cont'd)

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 14

1 various environmental organizations. Thank you for the  
2 opportunity to provide these comments tonight. And I would  
3 like to say, first of all, that I think another in-person  
4 hearing is needed as the virtual hearing does not fulfill the  
5 requirements for public review. Those without internet  
6 access must wait until 8:30 or until all others on WebEx has  
7 had an opportunity to speak. This puts all of those who are  
8 most adversely affected by the actions discussed in this EIS  
9 as the most disadvantaged in being able to comment on it. In  
10 other words, all of those without internet access are greatly  
11 disadvantaged in this hearing.

1/4-b

12 The process requesting to speak was not announced on the  
13 website prior to the call. It took a great deal of effort to  
14 find out what the process was. And I know this, that when I  
15 logged on to the call, that it was extremely difficult to  
16 find the hand to request to speak. And there was no -- the  
17 chat was not working. So, the whole process of being able to  
18 speak at this hearing is extraordinarily difficult.

19 My next point is that I request a programmatic  
20 environmental impact statement that is required by law and is  
21 needed before any additional action is taken. A programmatic  
22 environmental impact statement is the proper level of  
23 National Environmental Policy Act review because the proposed  
24 action by the NNSA meets all four of the programmatic review  
25 criteria. The expanded Plutonium Pit Production would

2/4-f

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 15

1 simultaneously, A, adopt an official policy;  
2 B, adopt a formal plan; C, adopt an agency program; and D,  
3 approve multiple major similar and connected actions at two  
4 different sites.

2/4-f  
(Cont'd)

5 Another point is that SRS does not have experience  
6 fabricating plutonium pits and is unlikely to be able to do  
7 so successfully. This would be a saving grace were it not  
8 for the fact that this would escalate the nuclear arms race  
9 worldwide with billions of dollars. This is a totally  
10 unnecessary expense, projected to be about \$3.6 billion at a  
11 time when money is needed for medical care and income  
12 assistance for the population during the COVID-19 pandemic  
13 and in future pandemic and climate disasters. Furthermore,  
14 it will increase the national debt while doing the  
15 unthinkable harm.

3/5-a

16 This will increase the chance of nuclear proliferation  
17 as other countries see that the U.S. is creating improved and  
18 new weapons of mass destruction. The purpose and need  
19 section of your EIS states that plutonium cores require  
20 updating. The cores typically last more than 100 years  
21 according to the Jason...

4/2-c  
5/1-c

22 MS. BOLTZ: You have 30 seconds.

23 MS. PRESTON: It is not true to claim that they require  
24 updating. I request the no-action alternative, to not  
25 construct a plutonium bomb plant at SRS. The no-action

5/1-c  
(Cont'd)

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 16

1 alternative isn't allowed. Thank you.

2 MS. BOLTZ: Thank you. Our next speaker is Tammy  
3 Shepherd, followed by Suzanne Jackson, and then Jim Marra.  
4 Ms. Shepherd?

5 MS. SHEPHERD: Yes. I'm Tammy Shepherd. Tammy, T-a-m-  
6 m-y, Shepherd, S-h-e-p-h-e-r-d. I'm President and CEO of the  
7 Columbia County Chamber of Commerce in Evans, Georgia. The  
8 Columbia County Chamber of Commerce represents over a  
9 thousand businesses in the Greater Augusta area. (Inaudible)  
10 and it is perfectly positioned for many long-term missions  
11 such as the Plutonium Pit Production mission. Our board of  
12 directors voice that Savannah River Site is the right  
13 location for this pit production mission and we will  
14 complement other projects at the site. Savannah River has  
15 over 60 years of experience, safely managing nuclear  
16 material, and is as more than capable of handling new  
17 important national security missions.

18 The many employees who work at SRS are our neighbors.  
19 Actually over 1,400 employees live in Columbia County. We  
20 believe SRS employees are experts in this industry. By  
21 creating new jobs and maintaining current jobs at this site,  
22 this will also keep our region growing and thriving. Our  
23 economic impact at this site is tremendous for our two-state  
24 and multiple-county region. And also to add to the South  
25 Carolina Chamber of Commerce, again it's a great job

1/5-b



IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 17

1 creation. On behalf of the board of directors of the  
2 Columbia County Chamber and our membership, we call upon the  
3 Department of Energy, the NNSA, Congress, and the entire  
4 administration to continue consideration of SRS as the  
5 location of the Plutonium Pit Production mission apropos of  
6 research and development activity. We ask that you all move  
7 forward with SRS as the new home for the Plutonium Pit  
8 Production site. Thank you.

9 MS. BOLTZ: Thank you. Next speaker is Suzanne Jackson,  
10 followed by Jim Marra, and then Julie Whitesell. Ms.  
11 Jackson?

12 MS. JACKSON: Hello. My name is Suzanne Jackson, S-u-z-  
13 a-n-n-e J-a-c-k-s-o-n. And I'm the executive director of  
14 ACTS, a local non-profit with the mission of serving  
15 individuals and families living in poverty, the working poor,  
16 senior adults on fixed incomes, and individuals who are  
17 facing financial uncertainties due to loss of the employment.

18 Thank you for the opportunity to provide comments in  
19 support of the pit production mission at SRS and for creating  
20 a forum to do so during COVID-19. ACTS has operated in Aiken  
21 County for more than 33 years. And during this time period,  
22 we've experienced firsthand the impact of SRS in our  
23 community. The support that the site provides to ACTS from a  
24 volunteer standpoint as well as financially is to be  
25 commended. Without the support of the site and its

1/5-b  
(Cont'd)

1/5-b

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 18

1 employees, ACTS would be limited in the number of clients we  
2 serve annually. We provide more than 10,800 services on an  
3 annual basis, rely on more than 300 volunteers to help  
4 deliver these services Monday through Friday.

5 Employees from Savannah River Site have been and  
6 continue to be active participants in our volunteer  
7 workforce. We are not alone. I speak on behalf of numerous  
8 non-profits in the CSRA. We are grateful for the breadth of  
9 support they received from Savannah River Site. For more  
10 than 70 years, SRS has been a vital community partner, not  
11 only providing an economic impact by helping to sustain our  
12 economy with direct and indirect jobs, but also in their  
13 support of local businesses and non-profits with missions to  
14 support vulnerable populations with limited resources, thus  
15 enhancing the quality of life in our community.

16 I have witnessed the impact of SRS during my 32 years in  
17 Aiken County, and how they conduct operations with exemplary  
18 safety record and the breadth of nuclear management and  
19 operations experience that has led and will continue to lead  
20 the day-to-day operations, all of which makes SRS a viable  
21 option for Plutonium Pit Production. We support the mission  
22 to bring pit production to SRS in order to meet the goals for  
23 the NNSA and the National Defense Mission for our country.  
24 Thank you. ACTS is very appreciative of our longstanding  
25 partnership with Savannah River Site and we are grateful to

1/5-b  
(Cont'd)

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 19

1 have an opportunity to express our support at this important  
2 mission. Thank you.

3 MS. BOLTZ: Thank you. Our next speaker is Jim Marra,  
4 followed by Julie Whitesell and Chris Nesmith. Jim Marra?

5 MR. MARRA: Yes, thank you. Good evening. My name is  
6 Dr. Jim Marra, J-i-m M-a-r-r-a. And I'm the Executive  
7 Director of Citizens for Nuclear Technology Awareness located  
8 in Aiken, South Carolina. CNTA is a non-profit organization  
9 consisting of over 450 members. This includes almost 200  
10 young professional members. We are an education and advocacy  
11 group, promoting the safe and effective use of nuclear  
12 technologies as it relates to energy, healthcare, national  
13 security and the environment. Our organization supports the  
14 Savannah River Site for the potential Plutonium Pit  
15 Production mission. We also look forward to providing  
16 comments on the draft EIS on this vitally important mission.

17 The Savannah River Site is ideally suited for the pit  
18 production mission. SRS has the infrastructure and workforce  
19 needed to conduct the mission. SRS has demonstrated the  
20 ability to conduct production-scale nuclear operations in a  
21 safe, secure and environmentally responsible manner.  
22 Opponents to siting a plutonium process facility at SRS have  
23 indicated environmental concerns and waste management  
24 challenges. Waste associated with the Plutonium Pit  
25 Production have established disposition paths as either low-

1/5-b  
(Cont'd)

1/5-b

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 20

1 level radioactive waste or transuranic waste. No additional  
2 high-level radioactive waste will be generated at SRS by  
3 siting of a Plutonium Pit Production facility. SRS has been  
4 the leader in the DOE complex in environmental remediation  
5 and waste management. No one can argue with the success that  
6 SRS has achieved in waste treatment and processing. These  
7 environmental clean-up efforts will continue under the  
8 direction of other skilled site workers. Thus, the pit  
9 production mission will not impact current clean-up work.  
10 SRS continues today as a production facility and will  
11 continue to be a key contributor to the defense of our  
12 country through the siting of a new production facility at  
13 SRS. Thank you for the opportunity to submit these comments.

14 MS. BOLTZ: Thank you. And as reminder, after you've  
15 made your comment, you can unraise your hand. Thank you.  
16 Our next speaker is Julie Whitesell, followed by Chris  
17 Nesmith and then Rick Lee. Julie Whitesell?

18 MS. WHITESELL: Hey, good evening. Thank you for the  
19 opportunity to speak this evening and for your presentation.  
20 My name is Julie Whitesell. That's J-u-l-i-e W-h-i-t-e-s-e-  
21 l-l. I am the current chairman of the Aiken Chamber of  
22 Commerce. The Aiken Chamber, representing 1,000 businesses,  
23 has endorsed pit production at SRS. This has been our  
24 position since February 15, 2018. Today we continue to stand  
25 by our support. We have also presented written comment

1/5-b  
(Cont'd)

1/5-b

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 21

1 earlier this week. I wanted to say too that I am an Aiken  
2 native. My father worked at Savannah River Site and I'm a  
3 second generation realtor. And I am also in support as I  
4 believe it's vital to the economic health of the Central  
5 Savannah River Area. Thank you for the opportunity to speak.

6 MS. BOLTZ: Thank you. Our next speaker is Chris  
7 Nesmith, Rick Lee and then Scott Yundt. Chris Nesmith?

8 MR. NESMITH: Hi, I'm Chris Nesmith. That's C-h-r-i-s  
9 N-e-s-m-i-t-h. I am the campus dean at the University of  
10 South Carolina Salkehatchie, located in Allendale, South  
11 Carolina. Thank you for the opportunity to express my  
12 support for the proposed pit production project at the  
13 Savannah River Site. Our campus at USC Salkehatchie serves  
14 several counties within the SRS region in South Carolina,  
15 including Barnwell and Allendale Counties.

16 Our campus and SRS have been great partners for many  
17 years. They provide outstanding support to us in numerous  
18 ways. And many of our students go on to work at the site in  
19 various capacities. Certainly there's no question there are  
20 economic and workforce benefits that this project will  
21 create. The expected new mission will create over 1,800 to  
22 2,000 new construction and operation job opportunities in its  
23 peak, and approximately 1,100 direct and 1,300 indirect jobs  
24 as well. And additionally, there are expected to be  
25 significant investments in workforce education needed to

1/5-b  
(Cont'd)

1/5-b

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 22

1 fulfill the mission. And these investments and opportunities  
2 will benefit other regional manufacturers and businesses  
3 beyond the site, as well as the students who go on to work  
4 for them. For example, our school a few years ago entered  
5 into an agreement with USC Aiken, our sister campus, to offer  
6 a two-plus-two program in industrial process engineering to  
7 prepare students for industrial and engineering careers in  
8 the region. And while SRS is a major employer for our  
9 students, other industries and manufacturers benefit from the  
10 educated workforce that this program helps to produce.

11       There are other considerations beyond jobs and the  
12 economy when considering a project like this of course, and I  
13 understand the concerns raised by some about the project. And  
14 as one of the previous speakers just noted, these concerns  
15 ought to be taken seriously. But SRS has demonstrated  
16 decades of safe nuclear waste management and processing,  
17 which proves they are fully capable of executing this new  
18 mission in a safe and environmentally responsible manner.

19       The site has a longstanding culture of safety and  
20 responsibility. And their current environmental management  
21 missions will continue to include this new expanded scope of  
22 production project. For these reasons, I have full  
23 confidence in the ability of Savannah River Site to take on  
24 this new and vitally important project safely and with  
25 minimal impact on the environment. This project will no

1/5-b  
(Cont'd)

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 23

1 doubt provide benefits to our region and local economy and  
2 provide further opportunities for students and our graduates  
3 in the workforce. But most importantly, will help ensure the  
4 security of the nation while continuing to help deter the use  
5 of nuclear weapons into the future. Thank you again for this  
6 opportunity to speak to you today.

7 MS. BOLTZ: Thank you. Rick Lee will be next, followed  
8 by Scott Yundt, and then Rick McLeod. Rick Lee?

9 MR. LEE: Thank you. Good evening. I am Rick Lee,  
10 Chairman of the South Carolina Governor's Nuclear Advisory  
11 Council. Governor McMaster extends his regrets for not being  
12 able to attend this meeting, but the demands of dealing with  
13 the pandemic made his attendance impossible. However, he  
14 asked me to convey his absolute support for bringing the  
15 enduring pit manufacturing mission to Savannah River.

16 To learn about this project, I went to D.C. and met with  
17 the Pentagon, spent a day with Princeton University, received  
18 briefings from the DOE and met with opponents to the pit  
19 production program. I am convinced that we must begin the  
20 process of refreshing our nuclear arsenal as soon as possible  
21 to address the decline of yield in the nuclear weapons. Our  
22 opponents -- many opponents of the pit program argue we don't  
23 need new pits because of the condition of the arsenal today  
24 doesn't justify the project.

25 The Department of Defense does not agree with that

1/5-b  
(Cont'd)

1/5-b

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 24

1 assessment. However, under the present scenario proposed by  
2 the NNSA, it will be 10 years before we achieve the planned  
3 80 pits per year and many more years before all of the  
4 warheads actually receive new pits. It is reasonable to  
5 expect that DOE will encounter schedule problems on this  
6 project and may well not make the 2030 deadline. We should  
7 be making our decisions based on the arsenal's condition in  
8 15, 20 or 30 years, not just today's status.

9       The enormity of the effort to produce pits guarantees  
10 that we cannot respond overnight if one day we wake up and  
11 the weapons have become unreliable. So, my perspective is  
12 this, Savannah River Site is ideally suited for the pit  
13 manufacturing program. The SRS area is blessed with huge  
14 amounts of land, water, good weather, plenty of residential  
15 property and a community that embraces the SRS. We have a  
16 great road network that can easily meet the need to bring  
17 people to work every day. The SRS workforce has proven they  
18 can meet mission requirements of nuclear programs and support  
19 the nation in whatever we ask of them.

20       Savannah River has demonstrated its ability to ramp up  
21 to meet any program requirements. And the MOX Building is a  
22 new NQA-1 quality hardened facility that has more than  
23 adequate space to meet pit manufacturing requirements,  
24 including supporting office, engineering, and warehouse space  
25 needed. There's virtually no new land disruption. Utilities

1/5-b  
(Cont'd)



IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 25

1 are adequate and waste management capabilities are already at  
2 SRS. Mission reliability for pit manufacturing is improved  
3 by having redundant capabilities at SRS. Some people are  
4 concerned that Savannah River will fall prey to the same  
5 environmental problems which plagued Rocky Flats. I disagree  
6 with their view because the new rules of operation, the  
7 environmental oversight provided by DHEC, the EPA and the  
8 public will never allow such a condition to occur in 2020,  
9 2030 or ever. We collectively as a nation have learned what  
10 the real cost of neglect to the environment is and have put  
11 measures in place so a Rocky Flats type problem can never  
12 occur again.

13 Finally, the economic impact to South Carolina is  
14 significant to this enduring mission. With as many as 2,000  
15 jobs for constructions and more than that number for  
16 operations, it is a major boost to the economy of South  
17 Carolina and the Aiken area. I am confident South Carolina  
18 will be an active partner with the DOE in training new  
19 employees and finding ways to support the program. For these  
20 reasons, I endorse bringing pit manufacturing to Savannah  
21 River using the two-site proposal. Thank you.

22 MS. BOLTZ: Thank you. Our next speaker is Scott Yundt,  
23 followed by Rick McLeod and then Tom Clements. Mr. Yundt?

24 MR. YUNDT: Hi, thank you for letting me make a comment.  
25 My name is Scott Yundt, Y-u-n-d-t. I am the staff attorney

1/5-b  
(Cont'd)

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 26

1 for Tri-Valley CAREs, which stands for Communities Against a  
2 Radioactive Environment. We're an organization located in  
3 Livermore, California that specifically monitors the Lawrence  
4 Livermore National Laboratory. It also is engaged with a  
5 national coalition of groups and monitors the NNSA's nuclear  
6 weapons complex. Generally, that national coalition is the  
7 Alliance for Nuclear Accountability.

8 So thanks again for letting me speak. And I appreciate  
9 the agency's efforts to hold this hearing virtually. And I  
10 would appreciate it if all of the agency's public hearings  
11 had a virtual aspect. However, I do want to reiterate the  
12 importance of having in-person hearings. And I would urge the  
13 agency to also hold an in-person hearing at SRS or in the  
14 area to allow people to attend who cannot attend this kind of  
15 virtual hearing, especially during this time of a pandemic  
16 and -- of COVID-19. I think a lot of people are distracted  
17 or otherwise engaged and are having trouble, don't giving the  
18 time to such a complicated draft document and giving the  
19 attention that it deserves.

20 So, I hope that the agency can consider still having an  
21 in-person hearing and extending the public comment period for  
22 written comments. I also just want to reiterate my view that  
23 the -- this process should not be occurring simultaneously  
24 with the LANL review on Plutonium Pit Production. It rather  
25 in my opinion, they should be -- we should conclude or the

1/4-b

2/4-a  
3/4-c  
4/4-f

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 27

1 agency should conclude the LANL review first so that the  
2 public can have an understanding of the impacts of the  
3 current plutonium production site before going over the  
4 analysis for the new proposal at Savannah River Site. I also  
5 want to express that relying on programmatic and other NEPA  
6 reviews that are decades old, as these documents do, is  
7 improper. The international, national and local conditions  
8 have all significantly changed over these last couple of  
9 years, let alone decades. And this includes our scientific  
10 understanding of the effects of climate change and the  
11 effects of a potential catastrophic weather event at Savannah  
12 River Site and other sites and the complex that are involved  
13 in the production of nuclear weapons.

14 And so relying on these old documents shouldn't happen.  
15 And we need a full programmatic review. And I realize that's  
16 a little out of scope of this particular process but still  
17 has merit in saying. I wanted to specifically ask a question  
18 about the wrought process. Go ahead.

19 MS. BOLTZ: And you have 30 seconds.

20 MR. YUNDT: Producing pits using the wrought process is  
21 suggested in the draft. And a description of the need to use  
22 this process versus other processes should be done, as well  
23 as the description of how that determination will be made  
24 whether or not they're going to use it for particular designs  
25 or how they are going to decide, how the agency is going to

2/4-a  
3/4-c  
4/4-f  
(Cont'd)

5/3-g

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 28

1 decide. And this process contributed to the environmental  
2 problems at the Rocky Flats plant. And if it's utilized at  
3 SRS, how will similar environmental problems be avoided? And  
4 then the alternative of not using the wrought process should  
5 be analyzed. Also, potential destructive acts need to  
6 include an analysis of an employee or an intruder removing or  
7 obtaining plutonium from the site, and then a terrorist...

8 MS. BOLTZ: If you could wrap up your comments, please,  
9 and...

10 MR. YUNDT: Okay. I also wanted to comment on the  
11 parking around the site, and an alternative for remote  
12 parking should be analyzed as well as...

13 MS. BOLTZ: Mr. Yundt, I'm going to have to ask you to  
14 wind up right now. And if you could submit your comments in  
15 writing, that will be considered.

16 MR. YUNDT: Will do. Thanks.

17 MS. BOLTZ: Okay. Thank you. Our next speaker is Rick  
18 McLeod, followed by Tom Clements and then Sharon Rodgers.

19 MR. McLEOD: Good evening. How are you all? I'm Rick  
20 McLeod, R-i-c-k M-c-L-e-o-d but pronounced McCloud. I am the  
21 president of the Savannah River Site Community Reuse  
22 Organization. Our organization is the Department of Energy's  
23 designated community reuse organization for the Savannah  
24 River Site. We are governed by a 22-member board of  
25 directors composed of business, government and academic

6/2-i  
7/3-g  
8/6-1.1

9/6-g

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 29

1 leaders from Georgia and South Carolina. As we did during  
2 the public scoping meeting, I'd like to say that we are  
3 comfortable with SRS taking on this mission. And it has the  
4 capability of performance based upon the history of the site.

5 The site is also well-suited to support the Plutonium  
6 Pit Production mission and we support this needed  
7 (inaudible). The letter will provide a lot of attributes on  
8 why we believe the SRS is well-suited for the pit production  
9 plant. Two specific comments I'd like to talk about is the  
10 site-specific documentation provided, looked at availability  
11 of housing and community service. But there needs to be a  
12 comparison between Los Alamos National Lab and SRS. The  
13 information I believe will help concur with the two-pronged  
14 approach for the pit production mission.

15 More important though, besides identifying the  
16 manufacturing authorization's onus in the EIS, both  
17 communities need more specific information on the skill mix  
18 of the anticipated workforce and the numbers associated with  
19 each skill. It's extremely important to not only have the  
20 availability of the future workforce in our local communities  
21 but that these workers have the right skills to meet the  
22 planned mission.

23 The local community will play a major role in the  
24 facilitation of the introduction and training of the local  
25 citizens. Access to this information is imperative and is

1/5-b

2/6-h.1

3/6-h.2

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 30

1 needed now to meet the schedule identified in the draft EIS.

2 Thank you for the opportunity to voice my concerns.

3 MS. BOLTZ: Thank you. Tom Clements, who'll be followed  
4 by Sharon Rodgers and then Jay Coghlan. Mr. Clements?

5 MR. CLEMENTS: Yes. Hi, I'm Tom Clements, that's T-o-m  
6 C-l-e-m-e-n-t-s. I'm the director of the non-profit public  
7 interest organization Savannah River Site Watch. The SRS  
8 plutonium bomb plant is unjustified for national security  
9 cause and environmental reasons. SRS has no experience with  
10 pits and is not qualified for this provocative mission. We  
11 support a no-action alternative that is not linked to  
12 proposed pit production at Los Alamos.

13 First, I do believe that this virtual hearing is  
14 problematic, and that it restricts public interaction on the  
15 matter. A face-to-face hearing must be held as soon as  
16 possible. Second, environmental regulations in an earlier  
17 court agreement stipulate that a programmatic environmental  
18 impact statement must first be prepared before site-specific  
19 documents are pursued. NNSA may well face a lawsuit over  
20 failure to prepare the PEIS. Today in a closely related  
21 matter, the National Academy of Sciences' committee on down-  
22 blending plutonium called for a PEIS on disposal of 48 metric  
23 tons of plutonium from SRS to WIPP. Third, before pursuing  
24 the pit project, there must be a full investigation into  
25 mismanagement at the MOX debacle.

1/5-a  
2/1-h  
3/3-f.1

4/4-b  
5/4-f  
6/8-c  
7/3-j

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 31

1 The draft EIS is a cursory document with many  
2 weaknesses. First, there is no clear explanation why reuse  
3 of existing pits is not being evaluated, nor is there mention  
4 that the JASON experts agree that most pits have minimum  
5 lifetime of 100 years. The document does not explain that  
6 the goal is new pits for unjustified new design warheads and  
7 to replace pits in over 3,500 refurbished warheads and to  
8 maintain them throughout this century in violation of  
9 disarmament agreements.

8/3-a  
9/1-c  
10/1-g  
11/2-a

10 The draft EIS does not adequately justify why two pit  
11 sites are needed, nor explain what the risks are of that --  
12 of a two-site approach. The document does not adequately  
13 explain how plutonium oxide would be produced at Savannah  
14 River Site. Unacceptably, more transuranic waste per pit  
15 would be produced at SRS versus Los Alamos. There's no  
16 documentation for the calculation of the amount of low-level  
17 radioactive waste created. This waste would be dumped in  
18 trenches at SRS which is not acceptable as we in South  
19 Carolina are tired of being a waste dumping ground.

12/1-d  
13/3-i  
14/6-j.1  
15/6-j.6

20 There's no discussion of what happens if the pit project  
21 falls apart and plutonium is stranded at SRS, ala the MOX  
22 debacle, which is a likely outcome. And finally, the  
23 document reveals that a green field site at SRS was excluded  
24 due to cost reasons, but the document does not discuss the  
25 prohibitive cost of conversion of the poorly-constructed MOX

16/6-j.2  
17/3-h

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 32

1 Building, a figure that we believe is far under what the  
2 actual cost will end up being for the plutonium bomb plant.  
3 That concludes my oral comments. I will submit extensive  
4 written comments for the record. Thank you very much.

5 MS. BOLTZ: Thank you. Our next speaker is Sharon  
6 Rodgers, followed by Jay Coghlan, and then Bob Pettit.

7 MS. RODGERS: Good evening. My name is Sharon Rodgers,  
8 S-h-a-r-o-n R-o-d-g-e-r-s. I am the president of United Way  
9 of Aiken County. And I've lived in Aiken County for almost  
10 40 years. This year marks the 70th anniversary of SRS in  
11 Aiken County.

12 The United Way of Aiken County owes its very existence  
13 to SRS. At this critical time in our nation's history, the  
14 United Way of Aiken County is proud to support SRS to be  
15 considered for the Plutonium Pit Production mission and for  
16 our community to host such an important national security  
17 mission.

18 Why SRS? Put simply, SRS has been operating safely in  
19 our community for 70 years, and has been involved with  
20 nuclear materials, since inception, and plutonium, for many  
21 decades. SRS has the experience and technical knowledge.  
22 SRS has the benefit of an enormous campus to expand  
23 facilities for the project and the capability to safely  
24 perform this mission. Moreover, SRS has the talent and  
25 resources to provide an effective, responsive and resilient

17/3-h  
(Cont'd)

1/5-b



IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 33

1 nuclear weapons infrastructure and the flexibility to respond  
2 to changing requirements. SRS employees have been  
3 successfully and safely executing its mission for 70 years.  
4 SRS has a world-class safety culture, and has operated 24x7  
5 for all of those 70 years. Aiken County welcomes this new  
6 mission which will provide construction and operations  
7 employment opportunities and investments that will benefit  
8 our region.

9       Lastly, SRS contractors and employees are active and  
10 engaged partners in our community. They are our go-to  
11 supporters. They are our largest contributor helping to  
12 support our 30 partner agencies and 45 critical need programs  
13 benefiting vulnerable seniors, children, disabled, unemployed  
14 and people in crisis. They provide what I call the four Ts;  
15 time, talent, treasure and testimony. This year -- 300 SRNS,  
16 SRR and other contractor volunteers worked at 27 different  
17 sites during our day of caring.

18       These volunteers also serve as board members and  
19 committee members. They help support our schools and provide  
20 our community with many resources. I am honored to support  
21 SRS. They care about our community and their mission to make  
22 the world safer. Thank you so much for giving me this  
23 opportunity to express these comments tonight.

24       MS. BOLTZ: Thank you. Our next speaker is Jay Coghlan,  
25 followed by Bob Pettit, and then Ralph Hutchison. Mr.

1/5-b  
(Cont'd)

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 34

1 Coghlan?  
2 MR. COGHLAN: It's Jay Coghlan. I work for Nuclear  
3 Watch New Mexico in Santa Fe, New Mexico. And working on  
4 Plutonium Pit Production issues at Los Alamos for a little  
5 bit over 30 years and now SRS. We will be submitting  
6 comprehensive comments, written comments. I'll just touch on  
7 a couple of the highlights for right now. And like one of  
8 the preceding speakers, I'll invoke the new recommendation by  
9 the National Academy of Scientists (phonetic) for a  
10 programmatic environmental impact statement on surplus  
11 plutonium disposition, which as you all know, you know, SRS  
12 is quite involved with.  
13 The National Academy cited the need for a PEIS being  
14 induced by the multiple locations, the decades of sustained  
15 effort that will be involved in the plutonium disposition,  
16 and to quote the National Academy of Scientists, they say, "A  
17 programmatic environmental impact statement that considers  
18 all affected sites as a system is the appropriate way to  
19 address the intent and direction of the National  
20 Environmental Policy Act." So, that aligns nicely with the  
21 main point I wanted to make, is that NNSA should first  
22 prepare a programmatic environmental impact statement, it can  
23 either be new or supplemental, but that there should be that  
24 PEIS then followed by site-specific documentation at both Los  
25 Alamos and the Savannah River Site. So, that's my primary

1/8-c

2/4-f

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 35

1 point.

2 Then I want to address some of the folks, especially the  
3 regional folks that first of all talks about Savannah River  
4 Site's capabilities and regional economic development and  
5 national security. And, of course, the need for a nuclear  
6 weapons stockpile for the purpose of deterrence has been  
7 mentioned a number of times, but historically it's always  
8 been more than deterrence. It's been a hybrid, both of  
9 deterrence and then actively planning for nuclear war  
10 fighting.

3/5-a

11 And in fact, that's why we have these thousands of  
12 weapons instead of the few hundreds needed for mere  
13 deterrence. And I'm not pulling this out of thin air. There  
14 are Department of Defense documents, high policy documents  
15 that specifically state that minimal deterrence is not the  
16 goal, is not the modus operandi, but instead the United  
17 States --

4/1-b

18 MS. BOLTZ: 30 seconds.

19 MR. COGHLAN: What's that?

20 MS. BOLTZ: You have 30 seconds remaining.

21 MR. COGHLAN: That went by quick. The other people that  
22 espoused the national security needs should also know there  
23 is no pit production scheduled to maintain the safety and  
24 reliability of the existing stockpile. It'll all be for  
25 modified pits, for speculative new design weapons. Those

5/1-g

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 36

1 pits won't be able to be full-scale tested giving the testing  
2 moratorium that could lower confidence and reliability or  
3 alternatively push us back into testing, which would have  
4 severe international proliferation consequences...

5 MS. BOLTZ: Could you please wrap your comments?

6 MR. COGHLAN: Yeah. So, at a time now for those touting  
7 SRS capabilities, the 900-pound gorilla in the room or the  
8 white elephant, however you want to put it, is the failed MOX  
9 facility, that is prime evidence of deep troubles throughout  
10 the NNSA weapons complex. So, I would urge the locals there  
11 to not necessarily count on all that -- all those dollars  
12 that they think will rain down from this new pit production  
13 mission. And that will conclude my comments for now.

14 MS. BOLTZ: Thank you. Bob Pettit will be next,  
15 followed by Ralph Hutchison, and Sandra Jordan. Bob Pettit?

16 MR PETTIT: Good evening. Thank you. Mayor Bob Pettit  
17 of North Augusta, South Carolina. That's P-e-t-t-i-t. I  
18 have a different opinion than our previous speaker.  
19 Maintaining the national capability to keep our nuclear  
20 weapons arsenal current must be a top goal for our nation.  
21 Our nation cannot let an essential capability be left  
22 unfilled. During my assignment at Robins Air Force Base, the  
23 major objective became keeping the central manufacturing  
24 firms in business to provide aircraft parts critical to  
25 sustaining our defense posture. That directly relates to my

6/2-c  
7/2-d

8/3-j

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 37

1 comments tonight.

2       It is unfortunate that production scale pit  
3 manufacturing doesn't exist right now in the United States.  
4 It's a critical capability this nation absolutely must  
5 regenerate. 2018 nuclear posture review strongly confirmed  
6 this need. SRS can provide that essential capability. City  
7 Council of North Augusta supports establishing this national  
8 defense mission at the Savannah River Site. Having a  
9 redundant capability at Los Alamos clearly makes sense.

10       Savannah River Site has been in the nuclear business for  
11 70 years. That shows it has the talent and resources along  
12 with the infrastructure to process nuclear materials,  
13 including plutonium, in the ongoing tritium mission. SRS,  
14 along with Savannah River National Lab, has a long history of  
15 plant operations with plutonium and other nuclear material.  
16 Obviously, it's the workers who are crucial to getting any  
17 job done and done safely. Experience in performing this type  
18 of work is available right now at SRS.

19       The safety culture is ingrained and supported by the  
20 record. Employees have proven adaptable to new missions and  
21 tasks. SRS employees have the requisite knowledge, proven  
22 skills and safety mindset. This reinforces the point that  
23 the Savannah River Site is the logical location for this new  
24 mission. Savannah River Site has been a community partner  
25 with North Augusta for many years. Economic impact is a

1/5-b

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 38

1 driver to our success. Many SRS employees live in our city.  
2 Local businesses benefit from purchases, supplies and  
3 services. The construction jobs, new direct mission jobs and  
4 indirect jobs are an essential economic driver. This new  
5 mission is important to North Augusta residents. I know the  
6 new impact -- I know the impacts from new job opportunities,  
7 workforce education and business stability are essential to  
8 improving the quality of life for North Augusta residents.  
9 Thank you for this opportunity to speak in support of the SRS  
10 and the new pit production mission. Thank you.

11 MS. BOLTZ: Thank you. Our next commenter is Emily  
12 Saleeby, followed by -- I'm sorry, things jumped out of  
13 order. We have Ralph Hutchison who is next, followed by  
14 Sandra Jordan, and then it'll be Emily Saleeby. Ralph  
15 Hutchison?

16 MR. HUTCHISON: Thank you. My name is Ralph Hutchison,  
17 R-a-l-p-h H-u-t-c-h-i-s-o-n. I want to thank you for the  
18 opportunity to attend this public meeting from Knoxville,  
19 Tennessee that would otherwise not be possible or practical  
20 for me. Unfortunately it took me more than 45 minutes with  
21 the WebEx phone support person to configure my computer to  
22 make it possible to join the meeting. We'll never know how  
23 many people are not so persistent and just gave up.

24 As nice as it is to be able to be here long distance,  
25 I'm also aware that a virtual meeting necessarily excludes

1/5-b  
(Cont'd)

1/4-b

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 39

1 people who lack the technology to participate. And I've  
2 already expressed my belief that an in-person public meeting  
3 is necessary to meet NNSA's NEPA requirements for the  
4 Savannah River Environmental Impact Statement.

5       This meeting is being held during a declared national  
6 emergency that has disrupted not only the physical and  
7 economic lives of many of us, including me, but has also,  
8 disrupted our social and emotional lives as well. To imagine  
9 that people who are caught in a web of disruption, struggling  
10 to manage each day as it comes, have the capacity to read and  
11 comment on a 323-page technical document as though it is  
12 business as usual, turns the very concept of a national  
13 emergency on its head.

14       In the drive to push forward with an arbitrary schedule,  
15 come hell or high water or novel coronavirus that has  
16 stricken more than a million people in our country and caused  
17 the deaths of 62,000 people in the last 8 weeks, you have  
18 clearly lost touch of your humanity. In these abbreviated  
19 comments tonight I want to note that the sole requirement for  
20 new pit production, since we have around 20,000 pits in  
21 storage at Pantex, is the manufacture of new design nuclear  
22 weapons of mass destruction. This is a profoundly  
23 provocative act that is sure to have a dramatic impact on  
24 U.S. nonproliferation efforts.

25       Indeed the modernization of the U.S. nuclear weapons

1/4-b  
(Cont'd)

2/1-b  
3/2-c  
4/1-g

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 40

1 complex is already compelling Russia and China to take  
2 similar steps. Mind you, we went first, in launching us on a  
3 new global nuclear arms race. This is not the future that  
4 any of tonight's speakers want for our kids and our  
5 grandkids.

6 My point though is that the proliferation impacts of  
7 establishing pit production at Savannah River must be  
8 considered in any documentation seeking to analyze impacts.  
9 This issue was identified in the scoping comments. It's  
10 marked in your draft as a comment that was considered. But I  
11 find no evidence in the draft, however, that the comment was  
12 addressed.

13 The draft does briefly mention the nuclear  
14 nonproliferation treaty and says, "It must be noted that the  
15 NPT does not provide any time period for achieving the  
16 ultimate goal of nuclear destruction."

17 MS. BOLTZ: You have about 30 seconds.

18 MR. HUTCHISON: Thank you. This statement is false. 19  
The NPT does not set a specific date, but it certainly does 20  
provide a time period. The commitment made by the United  
21 States and other nuclear nations in 1970 was to achieve  
22 disarmament and these words from the Nonproliferation Treaty,  
23 "At an early date." That was 50 years ago. Thank you. That  
24 concludes my comments.

25 MS. BOLTZ: Thank you. Our next speaker is Sandra

2/1-b  
3/2-c  
4/1-g  
(Cont'd)

5/4-i

6/2-a



IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 41

1 Jordan, followed by Emily Saleeby, and then Kevin Kamps. And  
2 again, you can unraise your hand after you've spoken. Thank  
3 you. Sorry, one moment. Ms. Jordan, go ahead. Sandra  
4 Jordan, are you there? Sandra Jordan? Yeah, I will mute you  
5 and come back to you, if you're still on the line.

6 Next is Emily Saleeby, Kevin Kamps, and then Grace  
7 Gifford. Emily Saleeby? Okay. Emily?

8 MR. WILSON: Please...

9 MS. SALEEBY: Yeah. Can you hear?

10 MS. BOLTZ: Yes, go ahead, I'm sorry. You're unmuted.

11 MR. WILSON: This is Congressman Joe Wilson. And I want  
12 to thank our, Ms. Boltz and Ms. Nelson for getting this  
13 hearing together. So, indeed I'm Congressman Joe Wilson J-o-  
14 e W-i-l-s-o-n. And I'm very grateful to represent the  
15 Savannah River Site. I have dedicated personnel there. I  
16 work very closely with Congressman Rick Allen. We're a team  
17 on behalf of the site. And it's also bipartisan. We work  
18 very closely with Congressman Jim Clyburn. I appreciate the  
19 professionals of the National Nuclear Security  
20 Administration, specifically Administrator Lisa Gordon-  
21 Hagerty for all their hard work in ensuring our national  
22 security through this critical mission of promoting and  
23 proving peace through strength.

24 Additionally, I'd like to thank the Savannah River  
25 Nuclear Solutions, along with Stuart MacVean, for his

1/5-b

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 42

1 leadership and success while keeping the safety of workers a  
2 top priority. I support the Savannah River plutonium  
3 processing facility at the Savannah River Site. As the only  
4 member of Congress who has ever worked at the Savannah River  
5 Site, I know firsthand of the dedicated personnel there.

6 As outlined in the 2018 Nuclear Posture Review, to  
7 ensure the necessary capability and capacity and  
8 responsiveness of the nuclear weapons infrastructure and the  
9 skills needed for the workforce, the United States needs to  
10 provide enduring capability and capacity to produce plutonium  
11 pits at a rate of no fewer than 80 pits per year by 2030.

12 A delay would result in the need for a higher rate of  
13 pit production at a higher cost. After extensive research,  
14 the NNSA came to the conclusion that to accomplish this goal  
15 a two-site solution is required for resiliency and mission  
16 success. With the availability of the former MOX facility, a  
17 building that's already been constructed with the intent of  
18 working with plutonium and the nuclear workforce that the  
19 States of South Carolina and Georgia already have, the  
20 Savannah River Site is the best option.

21 The environmental impact study further solidifies the  
22 mission of the SRPPF at the site. This site meets the needs  
23 for this critical mission from workforce readiness and  
24 manufacturing, to a strong record of safety and waste  
25 remediation. This site has continued to prove its capability

1/5-b  
(Cont'd)

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 43

1 of maintaining nuclear stockpile parallel to the success of  
2 the tritium enterprises. These successes have led to strong  
3 community support in South Carolina and Georgia, we've heard  
4 tonight, and the mission.

5 Local governments and state officials, we have academic  
6 officials, chambers of commerce. Chancellor Sandra Jordan is  
7 a superstar, have shown their enthusiasm for the pit  
8 production for this site as proven by Chairman Gary Bunker  
9 and Williston Mayor Jason Stapleton who has a 70-year history  
10 of public appreciation of the site. Our patriotic citizens  
11 are eager to support the defense of freedom with proven peace  
12 through strength. The Savannah River plutonium processing  
13 facility will create meaningful jobs for the residents,  
14 support curriculum in special schools to create a workforce  
15 pipeline for both this project and other missions at the  
16 site.

17 The timeliness for completing this project is critical  
18 as the nation does not have currently the capability of  
19 large-scale pit productions. I will continue to support the  
20 two-site plutonium pit mission and look forward to working  
21 with NNSA and Los Alamos National Lab and local leadership to  
22 ensure the needs of our national security are met and our  
23 citizens are safe. Thank you for your time and  
24 consideration. My thoughts and prayers for all families  
25 impacted by the Wuhan coronavirus. Good evening.

1/5-b  
(Cont'd)

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 44

1 MS. BOLTZ: Thank you, Congressman. Sandra Jordan are  
2 you there? You are next in line. Moving on then, Kevin  
3 Kamps, will be followed by Grace Gifford and then Kayla  
4 Kranenberg. Kevin Kamps?

5 MR. KAMPS: Yes, I'm here.

6 MS. BOLTZ: Go ahead.

7 MR. KAMPS: Thank you very much. My name is Kevin  
8 Kamps. And I serve as radioactive waste specialist at Beyond  
9 Nuclear in Takoma Park, Maryland. I also serve on the Board  
10 of Directors of Don't Waste Michigan. And given the 3-minute  
11 time limit, I'm going to have to limit my remarks and fill  
12 them out with written comments.

13 I would like to second the call from SRS Watch for the  
14 need for a programmatic EIS to review all options across the  
15 DOE complex concerning pit production, including the option  
16 to not construct new facilities to produce pits at SRS and  
17 Los Alamos National Lab. An important comment I'd like to  
18 make is, my objection to the bait and switch that is  
19 represented by switching from the MOX fuel fabrication  
20 facility to the Savannah River Site plutonium processing  
21 facility.

22 And please don't misunderstand me, we were huge  
23 opponents to the MOX fuel fabrication facility. We called  
24 for immobilization of surplus military plutonium as early as  
25 its proposal in the mid-1990s. My objection about the bait

1/4-f

2/2-h

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 45

1 and switch is that the MOX fuel fabrication facility was  
2 supposedly a swords into plowshares project to take surplus  
3 military plutonium and turn it into so-called Atoms for Peace  
4 nuclear fuel.

5 So, incredibly, after the waste of \$7 billion, with a B,  
6 of U.S. taxpayer money on a MOX fuel fabrication facility  
7 that will never be used for that purpose now there is a call  
8 to spend billions more to produce weapons. So, this bait and  
9 switch represents now a plowshares into swords project.  
10 Actually it's a swords into swords project. It's  
11 objectionable. And as previous speakers have said, it's a  
12 violation of our nonproliferation treaty obligations to  
13 disarm, and it also flies in the face, we are on the wrong  
14 side of history at this point with the treaty on the  
15 Prohibition of Nuclear Weapons, also called the Nuclear  
16 Weapons Ban Treaty, which has 36 state parties ratified  
17 already. A total of 81 state party signatories.

18 When that treaty goes into effect with the 50th state  
19 ratification, the United States will be an international  
20 outlaw, a rogue nation, as will the other nuclear weapons  
21 arsenal states in the world. It is high time, 75 years since  
22 the explosion of the Trinity test bomb in New Mexico and the  
23 explosions of atomic weapons at Hiroshima and Nagasaki, for  
24 the abolition of nuclear weapons. And this proposal flies in  
25 the face of that.

2/2-h  
(Cont'd)

3/2-a

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 46

1           And one last comment I would like to make is that in the  
2 introductory remarks, the Department of Energy said that  
3 there is no environmental justice violation associated with  
4 this proposal. And that is false, blatantly false. If you  
5 look at the concentration of nuclear facilities in the area,  
6 from the Savannah River Site, with its extensive radioactive  
7 contamination, to the Barnwell, South Carolina low-level  
8 radioactive waste dump that has long leaked into the  
9 neighborhood, to the Vogtle and Summer nuclear power plant...

10           MS. BOLTZ: If you could please wrap up your comments?

11           MR. KAMPS: The impact on largely African American  
12 communities like Shell Bluff, Georgia and Burke County,  
13 Georgia is an environmental injustice. Thank you.

14           MS. BOLTZ: Thank you. Our next speaker is Grace  
15 Gifford followed by Kayla Kranenberg and then Meira  
16 Warshauer. Grace Gifford?

17           MS. GIFFORD: My name is Grace Gifford, G-r-a-c-e G-i-f-  
18 f-o-r-d. I'm a resident of Horry County, and I care about  
19 all of the suffering counties in South Carolina and in our  
20 nation at this time. I support the use of my tax dollars to  
21 pursue nuclear disarmament. My career is in the area of  
22 speech language pathology. And one of my very first  
23 experiences was a tour of the Wassaic Developmental Center in  
24 New York State with my supervisor. This center cared for  
25 some of the most involved infants, children and adults. I

4/6-i.2

1/2-c

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 47

1 got to see what very small impacts and very large situations  
2 could happen before birth.  
3       Involved due to birth defects that could prevent  
4 learning, walking, movement, typical structural development  
5 and sometimes even causing death. Both chromosomal  
6 abnormalities and in utero influences contribute to  
7 development in infants who experience atypical outcomes.  
8 This is devastating for the mother, the family, and the child  
9 who is affected, as well as our society at large. Long-term  
10 science-based maternal and infant study should be part of the  
11 EIS.  
12       In my work at the Babcock Center in Columbia and then  
13 Horry County Schools, I continue to see the suffering that  
14 birth anomalies cause. The SRS pit project will continue to  
15 cause types of suffering, locally and internationally.  
16 Impacts of radiation and the manufacture of materials can be  
17 lethal or cause health problems. Children suffer at the  
18 development of nuclear weapons as materials aerosolized are  
19 carried by runoff, seep into groundwater. Children suffer  
20 should warheads ever be released. Why have them if they will  
21 never be released. Radiation used in war will make its  
22 effects manifest as it is again carried off by storm water,  
23 groundwater or through the air.  
24       I consider this project to encompass environmental  
25 injustice issues. Specifically this project defies morality

2/6-k.4

3/4-g  
4/2-g  
5/4-e  
6/5-a

7/6-i.2

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 48

1 and stands in opposition to human health and development. If  
2 national security is our goal, we must secure the health and  
3 normal development of our population. The EIS should be  
4 framed with this priority. Thank you for your time.

5 MS. BOLTZ: Thank you. Our next speaker is Kayla  
6 Kranenberg, follow by Meira Warshauer and then Rick Osbon.  
7 Kayla?

8 MS. KRANENBERG: Hi, my name is Kayla Kranenberg. It's  
9 K-a-y-l-a K-r-a-n-e-n-b-e-r-g. I'm the Executive Director  
10 for the American Heart Association here in the CSRA. I've  
11 worked as a community partner with SRS for the past 7 years.  
12 I'm in support of the production-scale pit projects. I  
13 believe it is imperative for our country and that SRS has the  
14 capability and history of success to complete this mission in  
15 a safe, environmentally responsive manner.

16 The site has the existing nuclear (inaudible) to provide  
17 the infrastructure and a history of decades of safe nuclear  
18 waste management and processing. When you arrive on site,  
19 there is no doubt that there is a phenomenal culture of  
20 safety. Every action is carefully thought through and looked  
21 after by safety lens. I feel confident that this project  
22 would be no different and feel completely comfortable with  
23 this project moving forward.

24 Economically, SRNS is an incredible part -- has been an  
25 incredible part of our community. On top of the thousands of

6/5-a  
(Cont'd)

1/5-b



IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 49

1 employees that rely on the site, they're also the first  
2 (inaudible) that is found in the communities through funding  
3 and volunteerism. Their employees have a culture of social  
4 responsibility and are incredibly giving of their time,  
5 talent and treasures. This project will have opportunity to  
6 bring more positions into our community, which is so needed  
7 in this critical time. I feel like this will not only  
8 benefit the employees and companies, but also many other  
9 regional businesses and community partners. Thank you.

10 MS. BOLTZ: Thank you. Our next speaker is Meira  
11 Warshauer, followed by Rick Osbon, and then Forest Mahan...

12 MS. WARSHAUER: Thank you. Thank you for allowing me to  
13 speak, and for unmuting my microphone. You just answered my  
14 first question, how do I speak. So, as you know, many of us  
15 are new, we're getting used to Zoom, but not everybody in the  
16 country has access to Zoom, or even to internet. And for  
17 this reason, although I appreciate the opportunity to speak  
18 tonight and I appreciate people -- hearing people from  
19 different parts of the country, which is a great benefit to  
20 Zoom, I think it cannot legally replace the in-person meeting  
21 that needs to happen.

22 But before even that, I'm concerned about the lack of  
23 the programmatic environmental impact statement. I feel like  
24 we've skipped over the most important step, which is, is this  
25 project needed given the overall scope of our nuclear

1/5-b  
(Cont'd)

1/4-b

2/4-f

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 50

1 preparedness? That has not been established. And the public  
2 has not been invited to comment on whether or not there is a  
3 need, and has not been given the adequate information to  
4 assess that need. Given our country's historic mission of  
5 nuclear disarmament, and given, for example, our negotiations  
6 with North Korea to not have more nuclear weapons, and Iran,  
7 similarly, no more nuclear weapons, this is going, as another  
8 speaker said, in the opposite direction.

2/4-f  
(Cont'd)

9 This is going towards arming us to the hilt, way beyond  
10 what, as far as I can tell, without having the PEIS. As far  
11 as I can tell, it's way beyond what could possibly be needed  
12 for a deterrent. We have already 10,000 -- between 4,000 and  
13 10,000 viable nuclear weapons. And so, to make more 20,000  
14 nuclear plutonium pits, or to make these 80 a year pit, this  
15 new pit, it seems wrong.

3/1-b  
4/2-a

16 And again, the PSIS can determine how to use the excess  
17 plutonium that we have. And another caller indicated, the  
18 immobilization was proposed. So, I feel like we're jumping  
19 over a bunch of fields that need to be explored before we can  
20 even get to this statement, to this point of evaluating the  
21 need for a facility like this.

5/4-e

22 I understand people in Aiken were tempted, they want to  
23 have the jobs for construction, they want to have -- and I  
24 know they have a very educated workforce down there. And I'm  
25 -- I applaud the nuclear -- the environmental cleanup that is

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 51

1 happening, and I think we need to accelerate that.

2 MS. BOLTZ: You have 30 seconds.

3 MS. WARSHAUER: So, put all of that together. And given  
4 the situation now, my -- I would advocate no-action  
5 alternative. Thank you.

6 MS. BOLTZ: Thank you. Our next speaker is Rick Osbon,  
7 followed by Forest Mahan, and then Elizabeth Merritt. Mr.  
8 Osbon?

9 MR. OSBON: Good evening. I'm Rick Osbon, O-s-b-o-n,  
10 and I have the honor of serving as the mayor for the City of  
11 Aiken. Tonight I'd like to speak in support of the Plutonium  
12 Pit Production Mission at Savannah River Site. Aiken is a  
13 city with a population of 32,000. And it's the home of over  
14 45% of the current SRS employees, and many of the site  
15 retirees. Our population for 7 decades has supported the  
16 national security needs of our country. There's a large  
17 sense of patriotism and pride in our city. We have  
18 confidence in the proven safety records of Savannah River  
19 Site and a deep-seated trust in its workforce, 70 years worth  
20 of trust.

21 SRS has a unique place in the DOE complex, with a track  
22 record of safety and success. It is a site that produces  
23 results. Production scale pit manufacturing, a capability  
24 the nation has not had for decades, was deemed imperative in  
25 the nation's 2018 Nuclear Posture Review. SRS can deliver

1/5-b

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 52

1 the stated intent of the 2018 Nuclear Posture Review to  
2 provide "an effective, responsive and resilient nuclear  
3 weapons infrastructure that can adapt flexibly to shifting  
4 requirements."

5 On January 8, 2019, the Aiken City Council unanimously  
6 passed a resolution supporting the Plutonium Pit Production  
7 in Savannah River Site. As a community, we are supportive of  
8 joining Los Alamos in a partnership to produce the pits that  
9 are needed to meet our national security goals.

10 Savannah River Site and the citizens of Aiken have been  
11 keeping our nation safe for 70 years. I believe the dual  
12 track pit production delivers a solid answer to the needs  
13 stated in the 2018 Nuclear Posture Review, and I strongly  
14 support and encouraged moving forward for Savannah River Site  
15 as a facility to meet this crucial need facing our country.  
16 Thank you for your time, and I hope everyone stays safe.

17 MS. BOLTZ: Thank you. Our next speaker is Forest  
18 Mahan, followed by Elizabeth Merritt, and if Sandra Jordan  
19 has joined us again, she'll be the third speaker. Yes.  
20 Forest Mahan?

21 MR. MAHAN: Yes, ma'am. This is Forest Mahan, F-o-r-e-  
22 s-t M-a-h-a-n. I'm the President of Aiken Technical College,  
23 and I'm here to speak on behalf of the pit production at  
24 Savannah River Site. Savannah River Site for the last 70  
25 years has stepped up and met every mission that it has been

1/5-b  
(Cont'd)

1/5-b

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 53

1 asked to undertake with safety and with great success. Many  
2 have spoken about the impact on Aiken, but also the region as  
3 well, includes a 5-county 2-state coalition that has been in  
4 support of the Savannah River Site. In fact they've been in  
5 support of us as well. Our higher education institutions  
6 help provide the workforce and have been working in Aiken  
7 Tech for over almost half a century to do this.

8 We have a proven track record as a team and as a  
9 community in successfully implementing answer one grant, work  
10 one grant and the work two grant, all of which help provide  
11 for the workforce needs of the region, and also the Savannah  
12 River Site. As the new pit plutonium production mission  
13 would take shape, the people of Aiken County and the  
14 surrounding counties, all the higher education institutions  
15 would step up and support this mission with the same success  
16 the site has seen in the last 70 years. Thank you.

17 MS. BOLTZ: Thank you. And as a reminder, once you've  
18 made your comment, you can un-raise your hand. Our next  
19 speaker is Elizabeth Merritt, followed by Sandra Jordan and  
20 Cassandra Fralix. Elizabeth Merritt?

21 MS. MERRITT: Good evening. My name is Elizabeth  
22 Merritt, E-l-i-z-a-b-e-t-h M-e-r-r-i-t-t. I'm a 40-year  
23 resident of North Augusta, and currently serve as the  
24 Executive Director of Community Ministry of North Augusta.  
25 I'd like to voice my support of Plutonium Pit Production at

1/5-b  
(Cont'd)

1/5-b

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 54

1 Savannah River Site. I'm excited about the prospect of  
2 hundreds and hundreds of new jobs, and the positive economic  
3 impact for our community. I can speak firsthand about the  
4 wonderful support that SRNS has shown to community Ministry  
5 of North Augusta, and other helping agencies in our area.

6 The Savannah River Site not only affects our economy in  
7 a positive way, it also makes the CSRA a better place to live  
8 for all people through volunteerism, community engagement and  
9 philanthropic support. Thank you.

10 MS. BOLTZ: Thank you. Sandra Jordan? Sandra Jordan,  
11 are you available? You had indicated that you'd like to make  
12 a comment. Okay, moving on then, Cassandra Fralix, David  
13 Fauth, and Scott Kovac. Cassandra?

14 MS. FRALIX: Yes, this is a Cassandra Fralix, C-a-s-s-a-  
15 n-d-r-a F-r-a-l-i-x. First, I want to say something about  
16 using the internet during the COVID crisis, it would seem  
17 like it was a good idea. However, I have to take care of my  
18 96-year-old mother, she's sheltering at home with me. And  
19 it's almost impossible for me to stay focused because I have  
20 to take care of her. Other -- if she did not have to have  
21 seclusion, then I could hire someone to come in and take care  
22 of her. So, I don't think that this was in the best interest  
23 of the public. I also want to say something, that we need to  
24 conduct a programmatic environmental impact statement. And  
25 before any project, like an Environmental Impact Statement

1/5-b  
(Cont'd)

1/4-b  
2/4-f  
3/5-a

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 55

1 can be conducted legally then we need a programmatic  
2 environmental impact statement, and that's vital. Also, we  
3 should not be concerned about the economic side of this.  
4 This has to do with the environment. That Savannah River  
5 Site is funded by the United States Government and the  
6 taxpayer -- payers are the ones that pay for that. So, all  
7 the people that are speaking about the economy in that area  
8 need to be thinking about where that money is coming from.  
9 And I also want to say something about the environmental  
10 issues that people say has not been a problem at Savannah  
11 River Site. We still have terrible cleanup issues there, and  
12 it's going to continue for generations. And somehow, that  
13 seems to have lost its focus in this discussion. We have not  
14 built plutonium pits at that site. We have no experience  
15 with that. It has a dangerous precedent.  
16 You can read about it, Rocky Flats situation. And we  
17 need to look at the full impact to the water, the soil, the  
18 air and to human beings. And that has to be discussed in the  
19 Environmental Impact Statement. We don't know what kind of  
20 liquid or forms of plutonium, transuranic waste and chemical  
21 waste might be released by error, accident into the  
22 environment. And that has not really been dealt with in the  
23 Environmental Impact Statement. Savannah River Site is  
24 located right next to a very important waterway.  
25 MS. BOLTZ: You have 30 seconds.

1/4-b  
2/4-f  
3/5-a  
(Cont'd)

4/1-i  
5/1-h

6/2-1

7/6-1

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 56

1 MS. FRALIX: And so, we must consider these things.  
2 This is a very disturbing scenario, if we have environmental  
3 fiasco. Waste management of plutonium is not low level, and  
4 clean up would be the focus now and will need to continue  
5 before we even start anything that has to do with plutonium.  
6 It would have a terrible impact on our environment, on all  
7 the life in that area. And so, you need to certainly take a  
8 better look at the EIS statement and make sure that we  
9 understand how it's going to affect.

10 MS. BOLTZ: Can you please wrap-up your comment?

11 MS. FRALIX: How it is going to affect our state, and  
12 the people, and the environmental life around it. Thank you.

13 MS. BOLTZ: Thank you. We're going to take a 5-minute  
14 break right now. After the break our next 3 speakers will be  
15 David Fauth, Scott Kovac and Alan Dobson. So, we will resume  
16 in 5 minutes, just to give everybody a few minutes to stretch  
17 their legs and attend to any other needs. Thank you.

18 (Recess)

19 MS. BOLTZ: Welcome back to our public hearing. We'll  
20 go back to our speakers. Just a reminder, if you would like  
21 to make a comment and you are on the internet, you can raise  
22 your hand to indicate your interest. We have a few more  
23 speakers left that have raised their hand, and then we will  
24 be moving over to the phones. Our next speaker is David  
25 Fauth. He'll be followed by Scott Kovac, and then Alan

8/6-j



IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 57

1 Dobson. Mr. Fauth?

2 MR. FAUTH: Yes, I'm David Fauth. That's F-a-u-t-h.

3 And I'm the Chairman of the Savannah River Site Retiree  
4 Association. Our association consists of members of the  
5 retirees and their spouses from the site. And are actually  
6 having over 10,000 folks that are part of our organization,  
7 and our association helps to support the lifestyle of these  
8 people in their retirement. I would like to speak -- I could  
9 take this opportunity to thank everybody for allowing me to  
10 speak in support of the plutonium production at the Savannah  
11 River Site.

12 Production scale pit manufacturing is a capability the  
13 nation has not had for decades. It's a key part of our  
14 national defense mission and imperative for our country. It  
15 also is a true national partnership, leveraging talent and  
16 resources at both SRS and the Los Alamos National Laboratory.  
17 Savannah River employees have helped make the site or make  
18 the world safer for the last 70 years, many of our retirees  
19 have taken extreme pride in providing this ability for the  
20 national -- world -- in the world.

21 The site has the existing nuclear processing  
22 infrastructure in place. Decades of safe nuclear waste  
23 management and processes have been carried out. And also,  
24 the site and the Savannah River National Laboratory have for  
25 decades been able to perform operations on nuclear materials

1/5-b

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 58

1 in glove box and do safe remote work and handling of nuclear  
2 materials.

3 We believe the Savannah River Site employees can do this  
4 mission in a safe and environmental -- environmentally and  
5 responsive manner. The site has again designated this to its  
6 strong and world class safety culture that we've been able to  
7 do since its inception. The site also has been able to  
8 implement projects in environmentally safe manners in  
9 accordance with all applicable regulations and working  
10 closely with the Department of Energy and the South Carolina  
11 Department of Health and Environmental Control as it provided  
12 close oversight of the site.

13 SRS has also been an economic development engine and an  
14 active community partner in our region. A lot -- a good  
15 portion of the state's or the site's annual budget ends up  
16 supporting a lot of local businesses. In addition to that,  
17 employees and retirees provide unparalleled volunteerism in  
18 our region. They help out in all our schools, our tech  
19 schools, our universities, and in over 50-plus leadership  
20 roles who have been nonprofits and community organizations in  
21 the CSRA.

22 For this reason, we really feel strongly towards the  
23 support of the mission. And I thank you for the opportunity  
24 to speak today.

25 MS. BOLTZ: Thank you. Our next speaker is Scott Kovac,

1/5-b  
(Cont'd)

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 59

1 followed by Alan Dobson and Charles Goldman. Mr. Kovac?

2 MR. KOVAC: Yes, thank you. My name is Scott Kovac, K-  
3 o-v-a-c. I'm with Nuclear Watch New Mexico. And I want to  
4 thank you for this opportunity to make comments on this Draft  
5 EIS.

6 First off, a nationwide programmatic environmental  
7 impact statement for expanded pit production must be  
8 completed before any new pit production. This is required  
9 due to the nature of future interconnectedness of waste,  
10 transportation, assembly, and disassembly actions of the  
11 nuclear weapons complex across the country.

12 Also, for this EIS we need more alternatives. One  
13 choice refurbishing the MFFF or not hints a pre-determination  
14 in this action. The fact that a new administration building  
15 the, 706-5F building will be torn down, the fence, the new  
16 security fence around the MFFF shows the lack of alternatives  
17 that have been thought out.

18 We also need current data. This impact -- the impacts  
19 of this Draft EIS are based upon the 2008 Complex  
20 Transformation Supplement Programmatic Environmental Impact  
21 Statement. This project is too important to rely on the  
22 analysis of a 12-year-old document for a generic building for  
23 125 pits per year. The complex transformation SPEIS, you  
24 know, it did analyze 125 pits at Savannah River, but it was  
25 not remodeling the MFF building, it was a brand new imaginary

1/4-f

2/3-d

3/4-h

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 60

1 generic building. The data in this EIS must be for 80 pits  
2 at a redesigned MFFF. And I am also wondering, I have a  
3 question, how can the NNSA estimate environmental impacts for  
4 buildings that are not yet designed. Any and all such  
5 standard building practices during the MFFF construction must  
6 be discussed in detail, and impacts of any substandard  
7 building practices for this nuclear facility must be  
8 analyzed. Thank you.

9 MS. BOLTZ: Thank you. Our next speaker is Allan  
10 Dobson, followed by Charles Goldman and Louis Zeller. Mr.  
11 Dobson?

12 MR. DOBSON: Good evening. My name is Alan Dobson.  
13 That's A-l-a-n D-o-b-s-o-n. I am speaking tonight as a  
14 neighbor of the Savannah River Site. I live within just a  
15 couple of miles of this -- boundary. I am speaking as a tax  
16 payer, a father and a grandfather and a citizen of this great  
17 nation. I want to express my unequivocal support for the  
18 production of pits at Savannah River. And a previous speaker  
19 spoke about the impact on water, soil, air and the people,  
20 and I believe that the impacts will be beneficial taken  
21 together that the impacts on the environment were negligible.  
22 I would also like to comment on the fact that I believe that  
23 the work force at Savannah River has the skills and will be  
24 able to cope with this new mission in an exemplary fashion.  
25 And so, I just like to close giving my unequivocal support

3/4-h  
(Cont'd)

4/3-j

1/5-b

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 61

1 for the procedure with this mission. Thank you.

2 MS. BOLTZ: Thank you. Our next speaker is Charles  
3 Goldman, and then Louis Zeller, and Pamela Greenlaw will  
4 follow. Mr. Goldman?

5 MR. GOLDMAN: Yeah, I am Charles Goldman, G-o-l-d-m-a-n,  
6 a retired physician living in Columbia, South Carolina. I  
7 appreciate having the opportunity to offer my comments on  
8 this extremely important proposal. I must say though that it  
9 is extremely difficult to participate in this hearing  
10 involving some pretty complicated computer downloads and  
11 other computer operations. This makes the hearing relatively  
12 unavailable for many who would be profoundly affected by the  
13 proposed facility, particularly people without good internet  
14 connections or computer sophistication. So, we're having a  
15 very skewed discussion here with a very -- in some ways elite  
16 audience, but anyway here is my position.

17 The history of the Savannah River Site is one of waste,  
18 waste of money, waste of resources and the toxic waste  
19 itself. This waste can be disposed in the underlying  
20 trenches and containers that will not hold up over time. The  
21 proposal does not adequately address problem, the problem of  
22 radioactive leakage in air, water and soil. A programmatic  
23 environmental impact statement, PEIS, must be done and must  
24 be thorough. For all these reasons, I request a full in-  
25 person hearing be scheduled as soon as possible after the

1/4-b

2/5-a

3/4-f

4/4-b

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 62

1 PEIS is complete. Based on the current information and  
2 process, I advocate the NEPA no action alternative. Thank  
3 you very much.

4 MS. BOLTZ: Thank you. Our next speaker is Louis  
5 Zeller, and Pamela Greenlaw, and Sophia Stroud. Louis  
6 Zeller? Mr. Zeller? Okay. Next speaker is Pamela Greenlaw.  
7 Ms. Greenlaw?

8 MS. GREENLAW: Oh, thank you very much for taking our  
9 comments and bearing with this entire process. I agree in  
10 great detail with other people who believe that there must be  
11 a PEIS, it's required by law to have one when you've got  
12 mission shifts across entire entities in this system of  
13 creating nuclear weapons. The last PEIS system wide was done  
14 in the late 1990s, it included Lawrence Livermore Labs, LANL,  
15 WIPP, Pantex. The SRS was not included at that time. Now  
16 that LANL and SRS are linked, this PEIS cannot be skipped.

17 I also believe -- well, not I believe, it is actually  
18 true that the public is not all present, and you have to do  
19 this in-person in addition to having it online. You cannot  
20 systemically or systematically eliminate or omit by default  
21 of not having the technology, or the skills, or broadband, or  
22 cell towers that, you know, allow dropping of calls. That  
23 cannot interrupt a full hearing. So, we must have one in  
24 person after the programmatic environmental impact statement  
25 is done, a new EIS needs to be done because you need to redo

4/4-b  
(Cont'd)

1/4-f

2/4-b

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 63

1 this entire process.

2 To have released the EIS during the pandemic was not  
3 just inappropriate and violated the spirit of NEPA, but it  
4 was cruel. People who cannot manage their survival needs  
5 helping out trying to get ends to meet, and you have moved  
6 lockstep forward as if nobody is in peril is unconscionable.  
7 So we expect a change. I say "we." Everybody who believes  
8 in fairness expect a change.

9 The EIS fails to establish the need and purpose for a  
10 new facility to fabricate plutonium pits and whether or not  
11 SRS is the best site to do that. This is not an attack on  
12 SRS, its employees or its current mission. But there is no  
13 defense for violating the international non-proliferation  
14 treaty. The decision to move forward without public input  
15 first on that is also unnecessary. The U.S. nuclear arsenal  
16 now consists of thousands of viable nuclear weapons.  
17 Plutonium pits of varying ages stored at Pantex number  
18 between 15 and 20,000. And they have almost reached the  
19 storage capacity there. There is no defense or explanation  
20 in the EIS as to why 80 pits are the total, whereas earlier  
21 studies indicated that 20 pits per year will be sufficient to  
22 update our nuclear weapons, including, well, let me just go  
23 over this quickly because --

24 MS. BOLTZ: You have 30 seconds.

25 MS. GREENLAW: Yes, ma'am. The probable impacts to

2/4-b  
(Cont'd)

3/1-a

4/2-b

5/1-b

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 64

1 water, air and wildlife at the SRS site are vastly different  
2 from where they are at LANL. Once incidents and accidents  
3 occur, plutonium releases and other particulates cannot be  
4 recalled or collected. Plutonium lasts 140,000 years.  
5 Ingested or inhaled, the particles emit neutrons in the  
6 lungs, liver, brain, bones and bone marrow, which is a great  
7 danger to fetuses, babies, women of child-bearing age  
8 downwind and downstream. The EIS fails to calculate the  
9 lifecycle environmental liability, the costs of  
10 contamination, the costs of healthcare that would be a  
11 result. There must be a method to also answer questions of  
12 the public. When we ask a question and you say no, you  
13 cannot answer a question..

14 MS. BOLTZ: Could you please wrap up your comments?

15 MS. GREENLAW: Yes, ma'am. It cuts our ability to have  
16 true interactive dialogue. Finally, as far as accountability  
17 and safety lapses being protected by EPA and DHEC. No, EPA  
18 had decided..

19 MS. BOLTZ: I am going to have to ask you to wrap up and  
20 submit your comments in writing. We have to move to next  
21 speaker. Thank you.

22 MS. GREENLAW: Thank you very much.

23 MS. BOLTZ: Sophia Stroud. You are next. Sophia  
24 Stroud?

25 MS. STROUD: Hi, can you hear me?

6/6-k.4

7/6-h.3

8/4-b



IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 65

1 MS. BOLTZ: Yes.

2 MS. STROUD: Hi, thanks. Yeah, I would like to echo  
3 other speakers, and especially the last speaker's call for  
4 programmatic environmental impact statement. I believe this  
5 is needed based on NEPA's own requirements. Agencies  
6 consider multiple actions together in a single programmatic  
7 environmental impact statement when those actions are  
8 connected, cumulative or similar. Clearly, these actions,  
9 the extension of pit production at LANL and the repurposing  
10 of the MOX facility to produce plutonium pits at Savannah  
11 River Site are clearly connected, cumulative and similar  
12 actions.

13 Because the administration cannot reach the Nuclear  
14 Posture Review goal without those proposed actions at LANL  
15 and SRS, and both actions depend on the Nuclear Posture  
16 Review for their justification, these actions are connected  
17 and it is required by law under NEPA. They must be  
18 considered together in a single EIS. So, I believe that is  
19 imperative to complete before moving forward. And I am also  
20 extremely concerned about the cost of repurposing the MOX  
21 facility, also echoing other speakers. \$7.6 billion is an  
22 incredibly appalling amount of money to have wasted, spent  
23 and just consequently wasted when this project fell through.  
24 On a similar note, I don't believe the environmental impacts  
25 of this SRPPF proposal have been sufficiently analyzed.

1/4-f

2/3-j

3/5-a

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 66

1 I am especially concerned about diversion of tax payer  
2 dollars going to new nuclear weapons facilities instead of  
3 cleaning up the massive environmental damage caused by past  
4 research and production. We're still discovering what long-  
5 term public health and environmental effects of leaving  
6 radioactive and chemical contaminants in the water and land  
7 are.

4/1-i

8 However, now we're at the point of building new, costly,  
9 nuclear facilities that will produce more contaminants. I am  
10 just very concerned about this. As well as funds being, you  
11 know, taken away from cleanup activities as we still have no  
12 idea what the final cost of this repurposing of the MOX  
13 facility will be. And based on past history, I expect it  
14 will balloon out of proportion beyond current estimations  
15 just based on past history of that site. So, as of now I  
16 support the no-action alternative. Thank you.

5/5-a

17 MS. BOLTZ: Thank you. And our next speaker will be  
18 Louis Zeller. And just as a reminder, if you have already  
19 made your comment, please un-raise your hand. Mr. Zeller?

20 MR. ZELLER: Yes. Now can you hear me?

21 MS. BOLTZ: Yes, go ahead.

22 MR. ZELLER: Thank you. Sorry, I had a bad connection  
23 before. International treaty obligations and U.S. law  
24 prohibit further development of atomic weapons. The nuclear  
25 non-proliferation treaty compels the United States to end

1/2-a

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 67

1 nuclear weapons development. The preamble of the treaty is  
2 unequivocal in its purpose. It states declaring intention to  
3 achieve the earliest possible date to the cessation of the  
4 nuclear arm race and undertake effective measures in the  
5 direction of nuclear disarmament to seek to achieve the  
6 discontinuance of all test explosions of nuclear weapons, the  
7 establishment and maintenance of international peace and  
8 security are to be promoted with the least diversion for  
9 armaments of the world's human and economic resources.

10 The nuclear non-proliferation treaty specifically  
11 requires that each of the parties to treaty undertakes  
12 negotiations in good faith on effective measures relating to  
13 cessation of the nuclear arms race at an early date and to  
14 nuclear disarmament, and on a treaty of general and complete  
15 disarmament under strict and effective international control.  
16 That last sentence was picked from the treaty which was  
17 passed by the United States Congress as well as  
18 internationally.

19 Plutonium pit production at this time would take us in  
20 the opposite direction, making good faith negotiations  
21 required under the law impossible. Those are my comments.  
22 Thank you.

23 MS. BOLTZ: Thank you. Okay, at this point that's  
24 everyone who has raised their hands on the online platform.  
25 We're going to move over to the callers on the telephone

1/2-a  
(Cont'd)

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 68

1 right now. Before we do that, just a reminder that you can  
2 also submit comments by e-mail or in writing in U.S. mail.  
3 For those of you on the phone who can't see the screen, the  
4 comment period ends on June 2, 2020. You can e-mail comments  
5 to NEPA. That's N like Nancy, E like Edward, P like Peter, A  
6 apple, dash SRS, that's like Savannah River Site, and that's  
7 at SRS.gov. Again that's nepa-srs@srs.gov. Or you can mail  
8 your comments to Jennifer Nelson, NEPA Document Manager, at  
9 NNSA/SRFO, that's for Savannah River Field Office, PO Box A,  
10 as in Apple, in Aiken, South Carolina 29802.

11 Now, as we move to the phones I am going to -- there is  
12 about 30 callers on the line. I am going to unmute them in  
13 groups of about six so that there is not too much confusion.  
14 When I unmute you, you should hear a beep. And I will ask if  
15 you all in that group are interested in making a comment, if  
16 you could state your name. I will write it down. And we  
17 will compile the list and move to the next group, and then  
18 come back and unmute you to make your comments. So, I have  
19 just unmuted a group of callers, if you heard a beep, you  
20 would like to make a comment please state your name.

21 MR. JOSEPH: Walt Joseph.

22 MR. OVERSTREET: Jack Overstreet.

23 MS. BOLTZ: Okay, one moment, Walt Joseph could you say  
24 your name again for me, so I can see what line you are on?

25 MR. JOSEPH: Walt Joseph, W-a-l-t J-o-s-e-p-h.

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 69

1 MS. BOLTZ: Okay, and then Jack Overstreet.

2 MR. OVERSTREET: Yes, Jack Overstreet.

3 MR. YOUNG: Tom Young.

4 MS. BOLTZ: So, Jack Overstreet, can you confirm, O-v-e-  
5 r-s-t-r-e-e-t?

6 MR. OVERSTREET: Yes, that's correct.

7 MS. BOLTZ: Okay. And Tom Young?

8 MR. YOUNG: Yes.

9 MS. BOLTZ: Okay, I'm going to mute you all again. I  
10 will come back to you. I believe I've got the correct phone  
11 lines for you.

12 Okay, the next group. Okay, I have unmuted a group. If  
13 you are interested in making a comment, if you could state  
14 your name.

15 MR. TODD: Moses Todd, T-o-d-d.

16 MS. BOLTZ: Okay, Moses Todd. Anybody else in this  
17 group like to make a comment? Okay. Mr. Todd, can you just  
18 confirm that you would like to make a comments so I can  
19 confirm the line that you are on.

20 MR. TODD: Yes, I would like to make a comment.

21 MS. BOLTZ: Okay, thank you. Moving to the next group.  
22 You've heard a beep and you would like to make a comment,  
23 please state your name.

24 MS. JACOBS: Tangee Brice Jacobs.

25 MS. BOLTZ: Okay, what was the name again? I got the

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 70

1 last name as Jacobs.

2 MS. JACOBS: First name Tangee, T as in Tom, A as in  
3 Anne, N as in Nancy, G as in George, E as in Edward, E as in  
4 Edward, B as in Boy, R as in Robert, I as in Ice, C as in  
5 Carole, E as in Edward.

6 MS. BOLTZ: Tangee Bryce Jacobs. Okay. Anyone else..

7 MS. JACOBS: Correct. Thank you.

8 MS. BOLTZ: Thank you. Anyone else on this group that  
9 would like to make a comment?

10 MR. PARIKH: Yes. Hi. This is Kunal Parikh.

11 MS. BOLTZ: Okay. Can you spell your name for me  
12 please?

13 MR. PARIKH: Sure. It is K-u-n-a-l, last name Parikh,  
14 P-a-r-i-k-h, and I am with Senator Tim Scott.

15 MS. BOLTZ: Okay. Thank you. Okay, anybody else in  
16 this group before I mute you? Okay, moving to the next  
17 group. Okay, if you heard a beep and you would like to make  
18 a comment, please state your name. Anyone who just heard a  
19 beep who would like to make a comment? Okay, I'm muting that  
20 group. Moving to the next. Okay, and in the last group if  
21 you just heard a beep and you would like to make a comment,  
22 please state your name. Okay, I will be muting that group  
23 and moving back to the top of our list. I believe this is  
24 Tom Young. Tom Young, can you say something? I think I  
25 didn't get the right line.

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 71

1 MR. OVERSTREET: I think you got me. This is Jack  
2 Overstreet.

3 MS. BOLTZ: Okay, Jack Overstreet, would you like to go  
4 ahead. Then I believe I will switch up the numbers.

5 MR. OVERSTREET: Sure. Thank you and good evening.  
6 This is Jack Overstreet speaking on behalf of U.S. Senator  
7 Kelly Loeffler. It's a pleasure to be here tonight. I am  
8 respectfully submitting the following comments for  
9 consideration in response to the Department of Energy  
10 National Nuclear Security Administration's preparation of its  
11 environmental impact statement for the Plutonium Pit  
12 Production at the Savannah River Site.

13 I am -- I support NNSA's proposal to repurpose the mixed  
14 oxide fuel fabrication facility at SRS to produce plutonium  
15 pits. The EIS shows that SRS has the personnel and capacity  
16 to conduct this essential National Defense Mission. The site  
17 has existed -- has existing nuclear processing infrastructure  
18 as well as significant land buffer zones. SRS has well-  
19 established record of operating safely for 70 years. The  
20 site is -- the site also has experience in repurposing its  
21 site facilities for new missions. SRS can operate this  
22 mission in compliance with all environmental laws and  
23 regulations. Selecting SRS for this effort will meet the  
24 objective to provide effective responsive nuclear weapons  
25 infrastructure for the enduring capacity to produce no fewer

1/5-b

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 72

1 than 80 plutonium pits by year -- by 2030. I am proud to  
2 support the selection of SRS for the Plutonium Pit Production  
3 mission. Thank you for the opportunity to provide these  
4 comments.

5 MS. BOLTZ: Thank you. Tom Young. I believe I have  
6 unmuted your line now. Okay, I am going to unmute the first  
7 group to get to Mr. Young. I apparently didn't get the  
8 number written down correctly, just one moment. Okay, Tom  
9 Young?

10 MR. YOUNG: Thank you. This is Tom Young. I'm a South  
11 Carolina state senator from South Carolina Senate District  
12 24, which represents a large portion of Aiken County. I'm  
13 also the Aiken County legislative delegation chairman. These  
14 comments are submitted on behalf of the Aiken County  
15 legislative delegation. Those members are myself, Senator  
16 Nikki Setzler, the honorable Bill Clyburn, Bill Taylor,  
17 Senator Shane Massey, Bart Blackwell, Bill Hixon and Melissa  
18 Oremus. We support the Savannah River Site being the  
19 location chosen for the expansion of the National Plutonium  
20 Pit Production Mission. The Savannah River Site has a  
21 longstanding history for nearly 70 years of providing a  
22 highly skilled workforce to support national security  
23 missions. Additionally, our two-state region of South  
24 Carolina and Georgia is uniquely situated to offer the  
25 trained workforce and the education pipeline which are both

1/5-b  
(Cont'd)

1/5-b



IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 73

1 necessary to support the successful operation of this  
2 important national security mission.

3 Further, with its longstanding safety and environmental  
4 protection record and expertise in both the nuclear and  
5 national security fields, we are confident of the Savannah  
6 River Site's ability to manage both the Plutonium Pit  
7 Production mission along with other missions at the Savannah  
8 River Site. We the Aiken County legislative delegation  
9 support the expansion of the national Plutonium Pit  
10 Production mission to the Savannah River Site and we request  
11 that the Department of Energy and the National Nuclear  
12 Security Administration approve this expansion.

13 We have shared this position with Secretary Perry,  
14 previously during a visit to the Savannah River Site. And we  
15 joined with the many other elected officials in the  
16 communities on both sides of the Savannah River who support  
17 the mission's expansion to Savannah River Site. We are  
18 confident that the Savannah River Site is an exceptional  
19 choice for this vital national mission. Thank you for your  
20 time and opportunity to submit these comments.

21 MS. BOLTZ: Thank you. I have Mr. Walt Joseph next, but  
22 I believe he is dropped off the line. I don't see him on the  
23 line that we had for him. I'll come back to him in a minute,  
24 or open up the lines again at the end of this. The next  
25 speaker will be Moses Todd and then Tangee Brice Jacobs. Mr.

1/5-b  
(Cont'd)

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 74

1 Todd?  
2 MR. TODD: Hi. Yes, I'm Moses Todd. I'm a charter  
3 member of the CAB, Citizen Advisory Board, at Savannah River  
4 Site and a former Augusta commissioner. I totally support  
5 nuclear -- the pits project at the Savannah River Site. And,  
6 you know, basically, because a lot of reasons that's been  
7 given that we are a nuclear community, we have a skilled  
8 workforce, and we understand the nuclear climate, and we have  
9 a perfect record as far as safety goes. Thank you for  
10 allowing me to make these comments.  
11 MS. BOLTZ: Thank you. Our next speaker is Tangee Brice  
12 Jacobs and then Kunal Parikh. Tangee Brice Jacobs?  
13 MS. JACOBS: Good evening. Good evening. Can everyone  
14 hear me okay? My name is Tangee Brice Jacobs. And I'm  
15 speaking as a concerned individual regarding this EIS as well  
16 as the proposed plutonium pit. And I'm speaking from my  
17 experience as a long-time resident whose family has lived in  
18 Fairfield County for over 100 years. Fairfield County, as  
19 I'm sure all of you are aware, is the size of the debacled  
20 V.C. Summer plant.  
21 In reading some of the EIS and listening to some of the  
22 supporters, I am reminded vividly of the comments and actions  
23 that came about that is so similar to what I'm hearing  
24 tonight. Number one, I've heard a lot on the history of  
25 Savannah, was -- so did V.C. Summer. I've heard a lot about

1/5-b

1/6-h.4

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 75

1 the safety and economic development, so did V.C. Summer. And  
2 I'm asking to think about the devastation that came to  
3 Fairfield County with the closing of V.C. Summer when a lot  
4 or many of the elected officials and community leaders were  
5 in support of this.

6 Number three. While we are all aware of the devastation  
7 of what we're experiencing with this pandemic, while I am  
8 glad to have the opportunity to be a part of a  
9 teleconference, emphasized in teleconference, because I'm in  
10 rural Fairfield County, internet access, and I can barely  
11 hear most of the comments, I think is very unfair and I will  
12 propose that an in-public, in-person meeting be held as soon  
13 as possible, because people in the areas that will be greater  
14 impacted are our rural and predominantly black communities  
15 where lack of internet or decent internet or affordable  
16 internet is a rarity. Technical knowledge in these areas,  
17 people of color, is limited. That's very unfair.

18 We look at number four. I would encourage everyone to  
19 take a second look at this EIS, emphasizing -- with emphasis  
20 on the word draft. I listen again and looked at the \$9  
21 billion wasted with V.C. Summer.

22 MS. BOLTZ: Please wrap up your comments.

23 MS. JACOBS: Construction delays, costs overrun,  
24 employment and taxes on the residents, health issues that  
25 have already been addressed. And I thank you so much.

1/6-h.4  
(Cont'd)

2/4-b

3/5-a

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 76

1 Because I touched on things I'm asking people to think about  
2 without going into detail, because of our limited time. But  
3 again, I thank you for this opportunity. And I'm hoping that  
4 people will give another look.

5 MS. BOLTZ: Thank you very much. Our next speaker is  
6 Kunal Parikh. Go ahead.

7 MR. PARIKH: Hello. Good evening, everyone. This is  
8 Kunal Parikh. And I'm with Senator Tim Scott. Thank you for  
9 providing the opportunity to provide comments on the  
10 Plutonium Pit Production project at the Savannah River Site.  
11 I'm extremely supportive of the Savannah River Site Plutonium  
12 Pit Production being located at the Savannah River Site.  
13 This is a national security and defense mission that we  
14 believe is integral to the security of the United States.  
15 The Nuclear Posture Review confirmed that 80 pits per year  
16 were necessary. And we believe that the Savannah River Site  
17 has the expertise and capability to produce the 50 of the 80  
18 that's being asked of them in conjunction with LANL.

19 The site has a strong and successful track record  
20 through various different missions, and we believe that this  
21 one will be no different. The new project will create scores  
22 of jobs. And the significant workforce, education,  
23 investments needed for this mission will also benefit other  
24 regional manufacturers and businesses. We're happy to  
25 provide our support to this vital mission. Thank you.

1/5-b

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 77

1 MS. BOLTZ: Thank you. And I'm going to just unmute the  
2 phone callers one more time if we missed anyone. Bear with  
3 me. Okay. I have unmuted the phone caller. Is there anyone  
4 else on the line who would like to make a comment?

5 MR. JOSEPH: Walt Joseph.

6 MS. BOLTZ: Okay, Mr. Joseph, please go ahead.

7 MR. JOSEPH: Okay. I'm Walt Joseph, W-a-l-t, J-o-s-e-p-  
8 h. I'm the Executive Director of the SRS Heritage  
9 Foundation. I'm also a retiree with 39 years service at the  
10 Savannah River plant site and laboratory. I was very proud  
11 of the work that we did at the site in supporting the nuclear  
12 defense mission. And the -- I believe that the deterrence is  
13 the reason we've had no nuclear war since the site was  
14 constructed. I agree with Mayor Osbon on that one. I also  
15 appreciate the NNSA and DOE for holding this meeting.  
16 Admittedly, the format may not perfect, but in the pandemic  
17 that we're faced with, a lot of us have no options in terms  
18 of getting out of the house. So, it's what we -- what you do  
19 with what you have.

20 I'd like to talk about just two things. Safety, we've  
21 talked a little bit about safety. But I'd like to point out  
22 that in 1952 when the Savannah River plant was being built,  
23 the construction workforce set three world safety records for  
24 construction, world records, 4.8, 6.3 and 10.0 million hours  
25 without an injury in construction, world safety record. In

1/5-b

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 78

1 1970, the site received the AEC best ever safety award. All  
2 the sites in the AEC complex. In 1998 DOE recognized the  
3 site is the complex leader and gave it an award for  
4 integrated safety management. And just last year, the site  
5 achieved 25 million injury-free hours. I think we can all  
6 agree that safety is a world class tradition at Savannah  
7 River, and that's the kind of facility that we'd like  
8 building pits.

9 In terms of ecology, 1951, the Department of Energy and  
10 DuPont initiated baseline studies of fields, rivers and  
11 natural radiation for what was to be the site. And they  
12 involved the Academy of Natural Sciences, University of  
13 Georgia and the University of South Carolina, and this work  
14 has continued. In 1961, they work became the Savannah River  
15 Ecology Lab. In 1972, the site was named the first National  
16 Environmental Research Park. To date there -- the ecology  
17 lab has produced more than 3,200 publications, and 400  
18 master's degrees and Ph.D. degrees have been given based on  
19 work conducted at Savannah River. It's probably the most  
20 studied piece of property in the world. The lab, the ecology  
21 lab has gone on...

22 MS. BOLTZ: You have 30 second left.

23 MR. JOSEPH: Yes. The ecology lab has gone on to  
24 support Chernobyl by helping to found the International  
25 Radioecology Lab. So, Savannah River is the birthplace of

1/5-b  
(Cont'd)

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 79

1 modern ecology and a world leader there in. And again, it's  
2 an ideal location for a pit production facility. Thank you  
3 very much.

4 MS. BOLTZ: Thank you. Again, I'm going to unmute the  
5 callers on the phone line just to make sure there's no one  
6 else who would like to make a comment. Is there anyone else  
7 on the phones who would like to make a comment? Okay. Thank  
8 you. We do have one other individual on the other platform,  
9 Eli Montgomery. Please go ahead.

10 MR. MONTGOMERY: Jennifer, can you hear me? Jacqueline?

11 MS. BOLTZ: Yes, we can hear you.

12 MR. MONTGOMERY: Okay. Okay. So, I just wanted to  
13 know, how do you plan on not making Aiken a wasteland because  
14 this is my hometown, I grew up here. Actually, I'm a  
15 filmmaker. I'm a creator. I'm also work in IT, when it  
16 comes to like social media. So, I'm trying to figure out  
17 like why did you do this meeting when nobody is interested  
18 because in the sense of the Coronavirus and COVID-19, all  
19 that stuff? Why did you do this meeting when nobody would  
20 actually be interested? Because I'm here from my views, like  
21 in a sense of the people that live here and my community.  
22 And I speak for the Quakers too. So, I don't understand why  
23 you did this meeting when nobody would be interested. Is it  
24 because nobody were interested? Because I mean, everybody  
25 else in their head is so focused on the Coronavirus. So,

1/5-b  
(Cont'd)

1/4-b

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 80

1 this type of meeting shouldn't really happen when nobody  
2 would be actually active to think about it in their mind.  
3 I'm just confused. Can you explain that? Jacqueline, can  
4 you explain that?

5 MS. BOLTZ: Do you have any additional comments? We're  
6 not taking any, exchanging questions and answers. So, if you  
7 have anything else to add, that will be added to the record.

8 MR. MONTGOMERY: Okay. Well, for the record, my name is  
9 Eli Montgomery, and I'm a creator in the area. And I also am  
10 very in tune with what you have going on. And I explain it  
11 to my fellow comrades and individuals that live here too that  
12 are creators. So, I just want you to know that if you guys  
13 think that this is something that's not being seen or heard  
14 from my community, from my community that I want you to know  
15 that it is, and I want you to know I talk about it very  
16 frequently, especially since you're doing this in a time  
17 where there's so much other stuff going on in society, it's  
18 very sad.

19 But I just want you to know I'm going to make people  
20 aware that are my age, I can't believe that people your age  
21 or older are doing this. It's very sad. Yeah, that's it.  
22 That's it. I don't have anything else to say. Like, I'm  
23 very sad. Like, I've just been shedding tears, because you  
24 guys really have done the most with this. And people don't  
25 know. And when people find out, they're just going to be

1/4-b  
(Cont'd)

2/5-a



IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 81

1 like, oh, My God, I can't believe this is happened. No, no.  
2 You guys have been doing this since last year. So, I just  
3 think it's very sad that you guys would actually go forth  
4 with something like this. And the fact...

5 MS. BOLTZ: Can you wrap up your comments? You've  
6 reached the time limit.

7 MR. MONTGOMERY: Yeah. That's it. I don't have...

8 MS. BOLTZ: Okay. Thank you very much. Okay, is there  
9 anyone who has not spoken who would like to make a comment?  
10 Please raise your hand, if you would like to add to the  
11 comments that we've received tonight. Okay, we have a little  
12 bit of time remaining. We have heard from all the speakers  
13 on the list and those on the telephone who indicated they'd  
14 like to make a comment. As we have a little bit of time  
15 remaining, again, we have about 15 minutes before our 09:00  
16 o'clock end time, we will open the list back up to anyone who  
17 would like to make additional comments. Before I do that, I  
18 did want to remind again that you can also submit comments in  
19 writing, by e-mail or in the postal mail. All comments are  
20 considered equally regardless of how they're submitted. Our  
21 comment period ends on June 2, 2020. And again, as a  
22 reminder, you can e-mail your comments to nepa-srs@srs.gov,  
23 or send them by mail to Jennifer Nelson, NEPA document  
24 manager, NNSA/SRSO, P.O. Box, A like apple, in Aiken, South  
25 Carolina 29802. I see we have one speaker who's raised their

2/5-a  
(Cont'd)

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 82

1 hand again. Kevin Kamps, please go ahead.

2 MR. KAMPS: Thank you. Yeah, I think, I forgot to spell  
3 my name last time. It's K-e-v-i-n, and last name is K-a-m-p-  
4 s. So, this is Kevin Kamps, radioactive waste specialist at  
5 Beyond Nuclear. And an additional comment I wanted to make  
6 was there was some discussion from other commenters on the  
7 value of nuclear deterrence, which I would really take issue  
8 with. And I wanted to cite a 2007 Wall Street Journal op-ed  
9 by the four horsemen of the nuclear apocalypse, as they've  
10 since been called. They included Secretary of State Henry  
11 Kissinger, Secretary of State George Shultz, Defense  
12 Secretary William Perry, and U.S. Senator Sam Nunn from  
13 Georgia. And their point was that there are very few, if  
14 any, existential threats to the United States, except for  
15 nuclear war. And we had better abolish nuclear weaponry from  
16 the face of the earth before the United States falls victim  
17 to unforeseen consequences. And it was quite remarkable, 13  
18 years ago, for these four horsemen of the nuclear apocalypse  
19 to say such a thing because in their careers they had  
20 depended on nuclear weaponry to advance their careers and to  
21 project U.S. power around the world.

22 And they have since seen the light that there are very  
23 diminishing returns in this Faustian vision bargain that  
24 we've struck as a nation. And some years later, they  
25 complemented, they added to their op-ed piece that the

1/2-c

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 83

1 proliferation of nuclear weaponry is becoming a greater and  
2 greater concern in the world. And certainly, this proposal  
3 is a very provocative act of nuclear proliferation, to put it  
4 mildly. And it's going to green light other countries. It's  
5 going to pressure other countries to match the United States.  
6 And I know that that area of the country at least for some  
7 folks, some of whom are on the call tonight, the money flow  
8 has been quite addictive. And it's time to break this  
9 addiction to nuclear revenue and plutonium.

10 And as I mentioned, it's the 75th Anniversary of  
11 Trinity, Hiroshima and Nagasaki, and now is the time to break  
12 this addiction. And I wanted to mention that in addition to  
13 the high environmental justice risk and the high nuclear  
14 weapons proliferation risk, there is also a very high  
15 environmental risk associated or large, as EIS processes  
16 often put it, there is a very large risk of further  
17 environmental contamination.

18 So just to put a point on it, a microgram of plutonium  
19 inhaled into the human lung can induce lung cancer in a human  
20 being. And so, if Savannah River Site is going to expand  
21 plutonium operations, this is putting workers at risk, this  
22 is putting neighbors at risk downwind, downstream, up the  
23 food chain, down the generations, and it's high time for, as  
24 other callers in have said tonight, it's high time to  
25 prioritize nuclear clean up from seven decades of nuclear

1/2-c  
(Cont'd)

2/6-i.2  
3/2-c

4/6-k.3  
5/6-j

IN RE: DEIS PUBLIC HEARING  
Comment Period on 04/30/2020

Page 84

1 contamination at Savannah River Site. It's time to abolish  
2 nuclear weaponry. Thank you very much.

4/6-k.3  
5/6-j  
(Cont'd)

3       And one last thing though. A previous commenter had  
4 said that there are waste disposal streams already in place.  
5 One of them he mentioned was the Nevada National Security  
6 Site, the former Nevada Test Site for disposal of plutonium  
7 or other so-called low level radioactive wastes from Savannah  
8 River Site. This is another treaty violation. And the  
9 treaty is the Treaty of Ruby Valley signed by the U.S.  
10 government in 1863 with the Western Shoshone Indian Nation.  
11 They don't want Savannah River Site's plutonium wastes on  
12 their homeland, Newe Segobia. So, that is not okay. And  
13 there are ongoing objections to New Mexico being regarded as  
14 a National Nuclear Wasteland in terms of plutonium disposal.  
15 So, I take exception with that previous comment. Thank you  
16 very much.

6/2-f

17       MS. BOLTZ: Thank you. Are there any other individuals  
18 who would like to make comments at this time? Make sure  
19 there's nobody that I'm missing. That appears to be everyone  
20 who would like to make a comment. So, as we're approaching  
21 the end of the meeting, I believe we will go ahead and thank  
22 everyone for their participation. Please note again that you  
23 can continue to submit comments until June 2, 2020. Those  
24 comments would be on the draft Environmental Impact  
25 Statement. Again, the information is provided on the screen.

7/6-j.7

---

**From:** systems@idsites.com <systems@idsites.com>  
**Sent:** Thursday, May 7, 2020 10:35 AM  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>  
**Subject:** [EXTERNAL] Comments on Proposed Plutonium Pit Production at Savannah River Site, Draft EIS

**Name**

Rev. George Alexander

**Company Name**

All Saints' Anglican Church

**Job Title**

Rector

**Phone Number**

(803) 270-0408

**Email Address**

[gfa2001@bellsouth.net](mailto:gfa2001@bellsouth.net)

**Mailing Address**

PO Box 502, Aiken, SC 29802

**Comments**

This is a very important mission which I emphatically support.

1/5-b

---

**From:** systems@idsites.com <systems@idsites.com>  
**Sent:** Tuesday, May 5, 2020 1:43 PM  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>  
**Subject:** [EXTERNAL] Comments on Proposed Plutonium Pit Production at Savannah River Site, Draft EIS

**Name**

Gary Benda

**Company Name**

AVANTech, Inc.

**Job Title**

Ex. Vice-President

**Phone Number**

8033171116

**Email Address**

[gbenda@avantechinc.com](mailto:gbenda@avantechinc.com)

**Mailing Address**

2050 American Italian Way Columbia, SC 29209

**Comments**

As a Small Business based in Columbia, SC, the Plutonium Pit Production will provide high paying, safe jobs for our state and community.

1/5-b

**From:** systems@idsites.com <systems@idsites.com>  
**Sent:** Wednesday, May 6, 2020 9:11 AM  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>  
**Subject:** [EXTERNAL] Comments on Proposed Plutonium Pit Production at Savannah River Site, Draft EIS

**Name**

Theodore M. Besmann

**Company Name**

University of South Carolina

**Job Title**

Professor

**Phone Number**

8037779863

**Email Address**

[besmann@sc.edu](mailto:besmann@sc.edu)

**Mailing Address**

541 Main Street, Room 434, Columbia, SC 29208

**Comments**

Re: Comments on Proposed Plutonium Pit Production at Savannah River Site, Draft EIS

Dear Ms. Nelson

I am respectfully submitting the following comments for consideration in response to the Department of Energy (DOE) National Nuclear Security Administration (NNSA) preparation of its environmental impact statement (EIS) for plutonium pit production at the Savannah River Site (SRS)

I support NNSA's proposal to use the current uncompleted Mixed Oxide Fuel Fabrication Facility (MFFF) at SRS to produce plutonium pits, supplementing an imperative manufacturing capability for our nation. The EIS shows that SRS has the talent and capacity to conduct this essential national defense mission and can do so safely, efficiently, and with a minimal environmental impact. The Site has existing nuclear processing infrastructure, plus significant land buffer zones, that make it a secure, ideal location for this project. SRS has a well-established record of responsibility operating safely for 70 years, and Site experience in reworking site facilities for new missions (K Area, L Basin, H Canyon) prove SRS can utilize the MFFF facilities and get a return on taxpayer investment. Finally, SRS can execute this mission while protecting the environment: SRS has a world-class manufacturing safety culture, and can operate this new mission in compliance with all environmental laws and regulations.

I feel selection of SRS for the plutonium pit production mission would be a wise decision.

Thank you for the opportunity to provide these comments.

1/5-b

---

**From:** systems@idsites.com <systems@idsites.com>  
**Sent:** Tuesday, May 5, 2020 4:30 PM  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>  
**Subject:** [EXTERNAL] Comments on Proposed Plutonium Pit Production at Savannah River Site, Draft EIS

**Name**

Bob Bigger

**Company Name**

Coastal Carolina National Bank

**Job Title**

Commercial Lender

**Phone Number**

803 644 9550

**Email Address**

[bob.bigger@myccnb.com](mailto:bob.bigger@myccnb.com)

**Mailing Address**

128 Laurens St NW Aiken, SC 29801

**Comments**

SRS employees have a world-class manufacturing safety culture, so we know they can safely do this work. Plus, the workforce education investments needed for this new mission will also benefit other regional manufacturers and businesses.

1/5-b



-----Original Message-----

From: Jan.Boudart@ppmx2.srs.gov <Jan.Boudart@ppmx2.srs.gov>  
Sent: Friday, May 1, 2020 8:54 PM  
To: info@nonukesyall.org; NEPA-SRS <NEPA-SRS@srs.gov>  
Subject:

MMay 1, 2020

TO:  
Ms. Jennifer Nellson  
NEPA DocumentMnager  
Nationaal Nuclear Security Administration  
Savannah River Field Office  
P.O. Box A  
Aiken, SC 29802

Dear Ms. Nelson,

hhe National Nuclear Security Administration, bby planning Plutonu Pit Production at Savannah RRIiver Site, is pursuing a course that is the diametrical opposite of keeping U.S. Citizens safe. The security of citizens in their homes and persons is the mandate of United States government, yet NNSA follows a course that diverts the national treasure away from this goal, threatening the population with homelessness, hunger, mayhem and disease. "Upgrading" the nuclear arsenal involves building a bridge across the canyon of the Rio Grande in New Mexico, while in the same State Indigenous people and other people are dying in the pandemic for lack of testing and care. Pu Pit Production should be discontinued as soon as possible and our tax dollars directed toward projects that will make us safe.

1/5-a

Sincerely aan Boudart, Chicago

Jan Boudart  
1132 W Lunt Ave Apt 7D  
Chicago, IL 60626  
janboudart1@gmail.com

**COMMENTS PRESENTED BY AIKEN COUNTY COUNCIL CHAIRMAN GARY BUNKER AT THE APRIL 30, 2020 PUBLIC HEARING ON THE DRAFT EIS FOR PLUTONIUM PIT PRODUCTION AT THE SAVANNAH RIVER SITE**

Good evening. I am Gary Bunker, Chairman of the Aiken County Council.

Thank you very much for the opportunity to speak with you this evening on the Draft Environmental Impact Statement (EIS) for Plutonium Pit Production at the Savannah River Site (SRS). The flexibility shown in the NNSA's decision to hold a "virtual online public hearing" is commendable given the ongoing COVID-19 pandemic.

For 70 years, Aiken County and surrounding communities have hosted the Savannah River Site. During the Cold War, thousands of local citizens forged the materials necessary for our strategic nuclear deterrent. This material production, including plutonium, prevented the Cold War from turning hot, and brought the world an unprecedented period of general peace.

Now our country is unable to produce the components – specifically plutonium pits – necessary to support our nuclear deterrent. Without this ability, strategic superiority will eventually shift to another power. And can we guarantee that this superiority will be in friendly hands? The 2018 Nuclear Posture Review further documented the urgency of this mission.

It makes sense to build these pits in two locations – at Los Alamos and at the Savannah River Site. Redundancy in this mission to manufacture 80 pits per year represents flexibility, added security, and reduced risk.

A production mission of this importance and magnitude should be located at the Savannah River Site given its superior nuclear material and chemical manufacturing experience, conduct of operations, analytical chemistry, engineering expertise, waste processing, supporting infrastructure, physical buffer zones, and world class safety culture. By repurposing the MOX facility, schedule risk can be reduced in bringing this production back online. And the experienced work force and aggressive SRS-related training initiatives at local institutions of higher education are an additional plus.

On January 9, 2018 and March 6, 2019, the Aiken County Council passed unanimous, bi-partisan resolutions supporting the Plutonium Pit Production Facility at SRS.

The Aiken County Council found that the plutonium associated with pit production is a national asset and will have beneficial use in our country's nuclear deterrence. And it endorsed the National Nuclear Security Agency's decision to use SRS as one of the two locations for this critical mission.

For these reasons, I support the preferred alternative of repurposing the Mixed Oxide Fuel Fabrication Facility (MFFF) into the Savannah River Plutonium Processing Facility (SRPPF). This alternative is consistent with the 2018 Nuclear Posture Review and it makes sense from the environmental, economic, and technical perspectives.

Thank you for this opportunity to submit comments. Aiken County continues to support the national security missions at the Savannah River Site.

1/5-b

---

**From:** systems@idsites.com <systems@idsites.com>  
**Sent:** Thursday, May 7, 2020 8:16 AM  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>  
**Subject:** [EXTERNAL] Comments on Proposed Plutonium Pit Production at Savannah River Site, Draft EIS

**Name**

Francine Burroughs

**Company Name**

Savannah River Nuclear Solutions

**Job Title**

Manager, Talent Acquisition & Development

**Phone Number**

803-852-8239

**Email Address**

[francine.burroughs@srs.gov](mailto:francine.burroughs@srs.gov)

**Mailing Address**

7311 Malton Ct. Evans, GA 30809

**Comments**

Thank you for considering this worthwhile opportunity at SRS.

1/5-b

**From:** systems@idsites.com <systems@idsites.com>  
**Sent:** Thursday, April 30, 2020 4:00 PM  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>  
**Subject:** [EXTERNAL] Comments on Proposed Plutonium Pit Production at Savannah River Site, Draft EIS

**Name**

Melinda P. Caldwell

**Company Name**

Aiken Standard

**Job Title**

Advertising & Events Specialist

**Phone Number**

615-330-7586

**Email Address**

[mocakdwell@aol.com](mailto:mocakdwell@aol.com)

**Mailing Address**

114 Mockernut Circle, Aiken, SC 29803

**Comments**

VIA ELECTRONIC MAIL  
Ms. Jennifer Nelson  
NEPA Compliance Officer  
National Nuclear Security Administration  
Savannah River Field Office, P.O. Box A  
Aiken, South Carolina 29802  
[NEPA-SRS@srs.gov](mailto:NEPA-SRS@srs.gov)

Re: Comments on Proposed Plutonium Pit Production at Savannah River Site, Draft EIS

Dear Ms. Nelson:

As an Aiken resident, I am respectfully submitting the following comments for consideration in response to the Department of Energy (DOE) National Nuclear Security Administration (NNSA) preparation of its environmental impact statement (EIS) for plutonium pit production at the Savannah River Site (SRS).

I support NNSA's proposal to produce plutonium pits at SRS, restoring an imperative manufacturing capability for our nation. The EIS shows that SRS has the talent and capacity to conduct this essential nation defense mission and can do so safely, efficiently, and with a minimal environmental impact. The Site has existing nuclear processing infrastructure, plus significant land buffer zones, that make it a secure, ideal location for this project. SRS has a well-established record of responsibility operating safely for 70 years, and Site experience in repurposing site facilities for new missions (K Area, L Basin, H Canyon) prove SRS can repurpose the MFFF production facilities and get a return on taxpayer investment. Finally, SRS can execute this mission while protecting the environment. SRS has a world-class manufacturing safety culture, and can operate this new mission in compliance with all environmental laws and regulations.

Selecting SRS for this effort will meet the objective in the 2018 Nuclear Posture Review, to provide "an effective, responsive, and resilient nuclear weapons infrastructure" for the enduring capability and capacity for both SRS and Los Alamos National Laboratory to produce no fewer than 80 plutonium pits per year by 2030.

I am proud to support the consideration and selection of SRS for the plutonium pit production mission, and commend DOE and SRS for its continued focus on safety and environmental stewardship in South Carolina in service to our nation.

Thank you for the opportunity to provide these comments.

Melinda P. Caldwell

1/5-b  
(Cont'd)

**From:** Tom Clements <tomclements329@cs.com>  
**Sent:** Tuesday, April 14, 2020 8:55 AM  
**To:** TheSecretary <The.Secretary@hq.doe.gov>; Lisa E Gordon-Hagerty <lisa.gordon-hagerty@nnsa.doe.gov>; Bruce M Diamond <bruce.diamond@nnsa.doe.gov>  
**Cc:** NEPA-SRS <NEPA-SRS@srs.gov>  
**Subject:** [EXTERNAL] Request for Comment Period Extension on Draft EIS on SRS Plutonium Pit Plant - Group Letter; Pls Acknowledge Receipt

**Re: Group Letter - Request for Extension of Comment Period on the Draft Environmental Impact Statement for Plutonium Pit Production at the Savannah River Site in South Carolina**

April 14, 2020

Mr. Dan Brouillette  
Secretary of Energy  
United States Department of Energy  
1000 Independence Ave., SW  
Washington, D.C. 20585  
The.Secretary@hq.doe.gov

Ms. Lisa E. Gordon-Hagerty  
Administrator  
National Nuclear Security Administration  
1000 Independence Ave., SW  
Washington, D.C. 20585  
Lisa.Gordon-Hagerty@nnsa.doe.gov

Mr. Bruce M Diamond  
General Counsel  
National Nuclear Security Administration  
1000 Independence Ave., SW  
Washington, D.C. 20585  
Bruce.Diamond@nnsa.doe.gov

***Request for Extension of Comment Period on the Draft Environmental Impact Statement for Plutonium Pit Production at the Savannah River Site in South Carolina***

Dear Secretary Brouillette, Administrator Gordon-Hagerty and Mr. Diamond,

We are writing to you concerning the "Draft Environmental Impact Statement for Plutonium Pit Production at the Savannah River Site in South Carolina" and the public comment period allotted to it.

Notice of the availability of the draft EIS was published in the Federal Register on April 3, 2020 and a 45-day public comment period was stipulated, to May 18. We believe that this comment period is inadequate given the unusual circumstances we are all facing.

Given the gravity of the matter at hand - review of the impacts of introducing fabrication of plutonium pits for new-design and refurbished nuclear weapons to a DOE site never before involved in this work (Savannah River Site) - and due to the impacts of the COVID-19 pandemic to the efficient functioning of our organizations and to the U.S. Department of Energy alike, we hereby request a 45-day extension of the comment period.

We believe that a 45-day comment-period extension is prudent and will afford additional time for groups and individuals to more properly review the draft document and respond. We believe that the current timeline for the project will not be impacted by extending the comment period. Additionally, as the comments on the document will hold an important place in the record of the National Environmental Policy Act process on pit production the comment period must be extended.

We are aware that the DOE's National Nuclear Security Administration has extended the comment period for on a related document, the "[draft Supplement Analysis to the 2008 Site-wide Environmental Impact Statement \(SWEIS\) for Continued Operations of Los Alamos National Laboratory \(LANL\)](#)." This extension, for which we thank NNSA, sets a precedent for extension of other comment periods being managed by NNSA during the pandemic crisis.

Further, we are aware of an April 8 letter sent by U.S. Senators to Mr. Russell T. Vought, Acting Director, U.S. Office of Management and Budget, to "Instruct all federal agencies to indefinitely extend all open or announced upcoming public comment periods for rulemakings and administrative actions not related to the COVID-19 pandemic response." Members of the U.S. House of Representatives have also voiced a similar request concerning extension of comment periods.

We extend our support for actions by DOE to protect the health and safety of all DOE staff during the pandemic crisis and hope no further staff have health impacts due to this unprecedented situation.

In conclusion, we request an extension of the comment period to approximately June 30. Please direct your response to this request to Tom Clements, Director, Savannah River Site Watch, Columbia, SC, tel. 803-634-3084, [tomclements329@cs.com](mailto:tomclements329@cs.com)

Sincerely,

Tom Clements  
Savannah River Site Watch  
Columbia, South Carolina

Bob Guild  
South Carolina Chapter of the Sierra Club  
Columbia, South Carolina

Amy Armstrong  
South Carolina Environmental Law Project  
Georgetown, South Carolina

David Oliver  
Columbia Friends Meeting  
Columbia, South Carolina

Tonya Bonitatibus  
Savannah Riverkeeper  
Augusta, Georgia

Glenn Carroll  
Nuclear Watch South  
Atlanta, Georgia

Janie Hill-Scott  
Georgia WAND Education Fund  
Waynesboro, Georgia

Ellen Thomas  
Proposition One Campaign  
and Environmentalists Inc.

1/4-a

Tryon, North Carolina

Jay Coghlan  
Nuclear Watch New Mexico  
Santa Fe, New Mexico

Marylia Kelley  
Tri-Valley CAREs  
Livermore, California

Ralph Hutchison  
Oak Ridge Environmental Peace Alliance  
Oak Ridge, Tennessee

Rick Wayman  
Nuclear Age Peace Foundation  
Santa Barbara, California

Don Hancock  
Southwest Research and Information Center  
Albuquerque, New Mexico

Cletus Stein  
The Peace Farm  
Amarillo, Texas

Vina Colley  
Portsmouth/Piketon Residents for Environmental Safety and Security (PRESS)  
National Nuclear Workers Nuclear Workers for Justice (NNWJ)  
Portsmouth, Ohio

Frank N. von Hippel  
Senior Research Physicist and Professor of Public and International Affairs emeritus  
Program on Science and Global Security  
Princeton University  
Princeton, New Jersey

Robert K. Musil, Ph.D., M.P.H.  
Rachel Carson Council  
Washington, DC

Cecili Thompson Williams  
Beyond the Bomb  
Washington, DC

Dr. Joe Berkson  
Washington Physicians for Social Responsibility  
Seattle, Washington

Robert M. Gould, MD  
Physicians for Social Responsibility  
San Francisco Bay Area Chapter

David Bezanson, Ph.D.  
Physicians for Social Responsibility  
Santa Cruz, California

Leonard Eiger  
Ground Zero Center for Nonviolent Action  
Poulsbo, Washington



Kelly Campbell  
Oregon Physicians for Social Responsibility  
Portland, Oregon

Dr. Tim K. Takaro, MD, MPH, MS  
Professor, Faculty of Health Sciences  
Simon Fraser University  
Burnaby, British Columbia

---

Cc: Ms. Jennifer Nelson, NEPA Compliance Officer, National Nuclear Security Administration Savannah River Field Office, P.O. Box A, Aiken, SC 29802; email: [NEPA-SRS@srs.gov](mailto:NEPA-SRS@srs.gov). Please include this letter in the record of the draft EIS.

**From:** Tom Clements <tomclements329@cs.com>  
**Sent:** Thursday, April 30, 2020 8:36 AM  
**To:** NELSON, JENNIFER <Jennifer.Nelson@nnsa.srs.gov>; NEPA-SRS <NEPA-SRS@srs.gov>  
**Cc:** marylia@earthlink.net; jay@nukewatch.org  
**Subject:** [EXTERNAL] Ms. Nelson: Concern about format for "virtual hearing" on proposed SRS Plutonium Bomb Plant & questions

Hello Ms. Nelson,

I am writing to express concern and ask a few questions about the format for the "virtual hearing" that NNSA intends to hold on April 30 on the draft EIS on the proposed SRS Plutonium Bomb Plant.

It is very unclear how participants in the "hearing" will be able to sign up to speak and how we will know who is participating in the hearing. This is a flaw of great concern that would not be the case in an in-person hearing.

Given serious doubts and unknowns about the process being used to conduct the "virtual hearing," I believe that this "virtual hearing" and its negative impact on motivation to participate leads me to the opinion that the "virtual hearing" must be canceled and that a real, face-to-face hearing, as stipulated under NEPA, be held when the situation allows.

I note that Mr. Bruce Diamond, general counsel for NNSA, said to me in a letter of April 21, 2020 that "NNSA staff are spending a considerable amount of time and effort to assure that this public meeting will be informative and useful as a forum for public comment." While I have no information as to how NNSA is spending its "time and effort" concerning the "virtual hearing," I will hold NNSA to the commitment he made and thus ask the following questions, if the "virtual hearing" goes forward:

1. How will sign up be done and when will it begin? This must be done in a manner so that any speakers has equal chance to speak at any given time and favoritism must not be given to elected officials or DOE contractors or speakers who may represent local economic interests (such as from such entities as the Chamber of Commerce or development authorities). Can you assure me that all speakers will be treated in an equal manner?
2. Has any advance outreach been done to any potential selected speakers in order to give them the offer of preferred time slots to speak? If this is the case, please provide communication sent to chosen individuals or organizations. I note that neither I nor those I am directly in contact with in the public interest community concerning the "virtual hearing" have been contacted in advance and given the opportunity to sign up early. Likewise, we have not been informed about how the "virtual hearing" will be conducted.
3. How long will each person have to speak?
4. How will we know who is participating in the "virtual hearing?" Can you assure me that all participants will have a real-time list of who is participating and who has participated?
5. Absent the usual poster session before face-to-face NEPA meetings, how will we be able to interact during the "virtual hearing" with officials and ask questions about the draft EIS and the larger issues at hand?

Thank you for your response to this inquiry, which I submit for the record of the draft EIS.

Sincerely,

Tom Clements  
Director, Savannah River Site Watch  
Columbia, South Carolina  
<https://srswatch.org/>

cc: Maryla Kelly, Tri-Valley Communities Against a Radioactive Environment (Tri-Valley CAREs), Livermore, CA  
Jay Coghlan, Nuclear Watch New Mexico, Santa Fe, NM

**From:** Kenneth Cook <kenny@williston-sc.com>  
**Sent:** Thursday, April 30, 2020 1:29 PM  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>  
**Subject:** [EXTERNAL] Support for Plutonium Pit Production at Savannah River Site

I want to express my support for Plutonium Pit Production at the Savannah River Site. SRS has the infrastructure to accommodate this project and the professional staff to ensure that production is done with the highest levels of safety and expertise. There is no place in the US that is better positioned to make this project a success and to maintain it in a safe and efficient manner. This is evident by the many projects that have been safely managed at SRS over its long and storied history.

1/5-b

Kenneth Cook  
Administrator  
Town of Williston  
803-266-7015

Peter F. De Lorme  
CAPStone Farm  
158 North Windsor Road  
Windsor, South Carolina 29856-2212

Mr. Dan Brouillette  
Secretary of Energy  
United States Department of Energy  
1000 Independence Ave., SW  
Washington, D.C. 20585

April 14, 2020

Request for Extension of Comment Period on the  
Draft Environmental Impact Statement for Plutonium Pit Production at the Savannah River Site

Dear Secretary Brouillette:

In light of COVID-19 related disruptions to our normal regimes (those of both the public and your team), I request that you extend for 45 days the original end to the public comment period on this matter. Further, I request you ensure that when group gatherings are safe again in Aiken County there takes place an in-person public hearing where those of us living in close proximity to the Site may ask questions and express our concerns.

1/4-a

This extension will allow interested parties and groups to fully research and discuss relevant material and prepare individual or group presentations for use at the hearing. Such an extension would be akin to that granted by NNSA for the SWEIS for Continued Operations of LANL and be in line with the expressed wishes of members of Congress who have requested the Administration extend during the COVID-19 crisis ongoing or upcoming comment periods.

2/4-a.1

As with all my correspondence to governmental agencies or members of Congress, the curtesy of a written acknowledgement of receipt and response will be appreciated. In as much as this is being sent during the initial comment period, I would also like this request included in the comments received during that period for the Draft EIS.

Thank you in advance for your attention to this matter.

Sincerely,

*Peter F. De Lorme*  
*PeterDeLorme@bellsouth.net*

CC: (via eMail)  
Ms. Jennifer Nelson, NEPA Compliance Officer, NNSA, Savannah River Field Office, P.O. Box A, Aiken, SC 29802  
Ms. Lisa E. Gordon-Hagerty, Administrator, NNSA, 1000 Independence Ave., SW, Washington D.C. 20585  
Mr. Bruce M. Diamond, General Counsel, NNSA, 1000 Independence Ave., SW, Washington, D.C. 20585

-----  
Peter DeLorme, PMP  
Cell: 803.426.6113  
158 N Windsor Road  
Windsor, SC 29856-2212  
W.A.T.E.R. Water for Aiken Through Environmental Reform  
Treasurer - Sierra Club South Carolina Chapter & John Bachman Group

-----Original Message-----

From: Dave fauth <dj1fauth@bellsouth.net>

Sent: Sunday, April 26, 2020 9:56 PM

To: NEPA-SRS <NEPA-SRS@srs.gov>

Subject: [EXTERNAL] Plutonium Pit Production at Savannah River Site

The Savannah River Site should be the choice site for this mission. The site has for 70 years provided DOE outstanding, safe performance in all its previous missions. The track record exceeds that of other DOE sites.

| 1/5-b

Dave Fauth  
Aiken, SC

---

**From:** systems@idsites.com <systems@idsites.com>  
**Sent:** Friday, May 8, 2020 6:22 PM  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>  
**Subject:** [EXTERNAL] Comments on Proposed Plutonium Pit Production at Savannah River Site, Draft EIS

**Name**

Dantzier K. Feagin

**Company Name**

Kimberly Clark

**Job Title**

Retired

**Phone Number**

803-507-4558

**Email Address**

[dannyfeagin.district3@gmail.com](mailto:dannyfeagin.district3@gmail.com)

**Mailing Address**

PO Box 67 Clearwater SC 29822

**Comments**

We need this project for our area.

1/5-b



**From:** nadadowgray@aol.com <nadadowgray@aol.com>  
**Sent:** Tuesday, April 21, 2020 5:37 PM  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>; Brian.Costner@hg.doe.gov; BruceDiamond@nnsa.doe.gov;  
NEPA.comments@npo.doe.gov; lanisweissa@nnsa.doe.gov  
**Subject:** [EXTERNAL] Important Action Needed: Public Comment Periods to be Extended!

LEADERS IN BOTH HOUSES OF CONGRESS HAVE CALLED FOR ALL PUBLIC COMMENT PERIODS TO BE EXTENDED.  
I AGREE WITH THE TWENTY FOUR SENATORS WHO WROTE: "THE U.S. PUBLIC IS NOT ONLY LEGALLY ENTITLED TO A MEANINGFUL HEARING OPPORTUNITY TO PARTICIPATE IN THESE IMPORTANT PROCEEDINGS, THEIR PARTICIPATION IS CRUCIAL / CRITICAL TO ENSURING THAT AGENCIES' WORK IS OPEN TO PUBLIC SENTIMENT IN LIGHT OF THE COVID - 19, NATIONAL EMERGENCY. WE EXPECT THAT THE DEPT. OF ENERGY AND NATIONAL NUCLEAR SECURITY ADM. IMMEDIATELY INSTITUTE AN INDEFINITE EXTENSION OF ALL PUBLIC COMMENT PERIODS AND THE PUBLIC BE ABLE TO DEVOTE ATTENTION TO THESE ISSUES  
THE 'VIRTUAL' PUBLIC HEARINGS AND MEETINGS ARE NOT ACCEPTABLE! THEY EXCLUDE A MAJORITY OF CITIZENS: ELDERLY WITHOUT COMPUTER ACCESS/ SKILLS, LOW INCOME, UNEMPLOYED AND RURAL CITIZENS WITHOUT ACCESS TO THE WEB. WE, THEREFORE, MUST DEMAND THE DEPT. OF ENERGY AND NATIONAL SECURITY ADMIN. IMMEDIATELY INSTITUTE AN INDEFINITE EXTENSION OF ALL PUBLIC COMMENT PERIODS AND RESCHEDULE UNTIL SUCH TIME AS THE NATIONAL EMERGENCY IS LIFTED.  
Thank you.  
Nancy Adadow Gray,  
Frankfort, MI 49635  
[N.adadowgray@aol.com](mailto:N.adadowgray@aol.com)

1/4-a.1

2/4-b

---

**From:** Julia Hall <julia-hall@att.net>  
**Sent:** Tuesday, April 14, 2020 5:15 PM  
**To:** TheSecretary <The.Secretary@hq.doe.gov>  
**Cc:** Lisa E Gordon-Hagerty <lisa.gordon-hagerty@nnsa.doe.gov>; Bruce M Diamond <bruce.diamond@nnsa.doe.gov>; NEPA-SRS <NEPA-SRS@srs.gov>  
**Subject:** [EXTERNAL] Savannah River Site - Plutonium Pits

Dear Mr. Brouillette:

I am formally requesting that the comment period for this project be extended by at least another 45 days and schedule a hearing when individuals are able to speak and ask questions publicly. The current Covid-19 pandemic has disrupted the normal business of government and flow of information, such that the right of citizens to participate in the process is restricted against the spirit of the law.

Notice of the availability of the draft EIS was published in the Federal Register on April 3, 2020 and a 45-day public comment period was stipulated, to May 18. I believe that this comment period is inadequate given the unusual circumstances we are all facing.

This is an extremely important project and its impact on the community and environment in the region will be affected for decades to come. The Savannah River Site has not been involved previously in the fabrication of plutonium pits for nuclear weaponry.

An extension of the review and comment period will afford additional time for citizens and community groups to study the draft documents and respond to any concerns the document presents. It is my understanding, too, that such public comments will become part of the legally required documentation of the process.

Further, I am aware of an April 8 letter sent by U.S. Senators to Mr. Russell T. Vought, Acting Director, U.S. Office of Management and Budget, to "Instruct all federal agencies to indefinitely extend all open or announced upcoming public comment periods for rulemakings and administrative actions not related to the COVID-19 pandemic response." Members of the U.S. House of Representatives have also voiced a similar request concerning extension of comment periods.

Sincerely,

Julia H. Hall

1/4-a

2/4-a.1

**From:** systems@idsites.com <systems@idsites.com>  
**Sent:** Friday, May 8, 2020 4:16 PM  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>  
**Subject:** [EXTERNAL] Comments on Proposed Plutonium Pit Production at Savannah River Site, Draft EIS

**Name**

Charles Hansen

**Company Name**

consultant

**Job Title**

Consultant

**Phone Number**

8036346229

**Email Address**

[chansen10@bellsouth.net](mailto:chansen10@bellsouth.net)

**Mailing Address**

110 Steeple Ridge Rd, Aiken SC 29803

**Comments**

Re: Comments on Proposed Plutonium Pit Production at Savannah River Site, Draft EIS

Dear Ms. Nelson

I am respectfully submitting the following comments for consideration in response to the Department of Energy (DOE) National Nuclear Security Administration (NNSA) preparation of its environmental impact statement (EIS) for plutonium pit production at the Savannah River Site (SRS)

I support NNSA's proposal to repurpose the Mixed Oxide Fuel Fabrication Facility (MFFF) at SRS to produce plutonium pits, restoring an imperative manufacturing capability for our nation. The EIS shows that SRS has the talent and capacity to conduct this essential nation defense mission and can do so safely, efficiently, and with a minimal environmental impact. The Site has existing nuclear processing infrastructure, plus significant land buffer zones, that make it a secure, ideal location for this project. SRS has a well-established record of responsibility operating safely for 70 years, and Site experience in repurposing site facilities for new missions (K Area, L Basin, H Canyon) prove SRS can repurpose the MFFF production facilities and get a return on taxpayer investment. Finally, SRS can execute this mission while protecting the environment: SRS has a world-class manufacturing safety culture, and can operate this new mission in compliance with all environmental laws and regulations.

I can attest to these facts based on 20 years of experience in the Naval Nuclear Propulsion Program as a senior official reporting directly to ADM HG Rickover for ten of those years. I worked in nuclear shipyards for 15 of those years as the Admirals representative responsible for design, construction, testing and maintenance of nuclear submarines. I also spent 8 years as a senior manager for Babcock and Wilcox performing maintenance on commercial nuclear utilities and another 18 years in the Department of Energy waste and spent fuel cleanup programs at Hanford Washington and Savannah River Site. SRS is suited by experience and geographical location to safely perform pit production capabilities and with experience to do just that. There is no other DOE site in this nation with the safety culture and expertise that is demonstrated by SRS contractors and the Savannah

1/5-b

River National Laboratory.

I am proud to support the consideration and selection of SRS for the plutonium pit production mission, and commend DOE and SRS for its continued focus on safety and environmental stewardship in South Carolina in service to our nation.

Thank you for the opportunity to provide these comments.

1/5-b  
(Cont'd)

**From:** systems@idsites.com <systems@idsites.com>  
**Sent:** Thursday, May 7, 2020 10:50 AM  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>  
**Subject:** [EXTERNAL] Comments on Proposed Plutonium Pit Production at Savannah River Site, Draft EIS

**Name**

Lyddie Hansen

**Company Name**

retiree

**Job Title**

not applicable

**Phone Number**

[REDACTED]

**Email Address**

[lyddiehansen@bellsouth.net](mailto:lyddiehansen@bellsouth.net)

**Mailing Address**

[REDACTED]

**Comments**

Please do not provide my home phone number or mailing address to others.

Ms. Jennifer Nelson  
NEPA Compliance Officer  
National Nuclear Security Administration  
Savannah River Field Office, P.O. Box A  
Aiken, South Carolina 29802  
[NEPA-SRS@srs.gov](mailto:NEPA-SRS@srs.gov)

Re: Comments on Proposed Plutonium Pit Production at Savannah River Site, Draft EIS

Dear Ms. Nelson:

I wish to submit the following comments for consideration in response to the Department of Energy (DOE) National Nuclear Security Administration (NNSA) preparation of its environmental impact statement (EIS) for plutonium pit production at the Savannah River Site (SRS).

I believe the NNSA's proposal to repurpose the Mixed Oxide Fuel Fabrication Facility (MFFF) at SRS to produce plutonium pits is the right step to maintaining our national security. During these uncertain times, it is very important that we restore our pit manufacturing capability for our nation and there is no better place to do that than SRS. It has the talent, location, local support and safety culture necessary to take on this challenge.

For 70 years SRS has proven its ongoing capability to meet national needs with minimal impact on our environment. The early founders of SRS worked to protect the eco-systems, while pursuing work to end the Cold War. Building on the early guidance of

nationally acclaimed environmental scientists such as Dr. Ruth Patrick, SRS is in the best position to manufacture pits while ensuring our eco-systems continue to thrive.

Given the 300 square miles of the Site, it has more than adequate buffer zones to ensure the project can securely and safely be accomplished. There is no other location in our country that can match the capabilities of SRS to ensure the security of pit production.

SRS has a well-established record of responsibility operating safely for 70 years, and experience in repurposing site facilities for new missions. Both K and L Reactors were successfully repurposed and continue to be the mainstay of vital missions. I believe the same can be accomplished with the MFFF production facilities.

While it is not as important as safety, I would like to see the NNSA pursue the repurposing of the MFFF production facilities as a reasonable return on investment. It is not lost of me that the cost of MFFF production facilities was tremendous and without another reasonable option, a waste of taxpayer money. The NNSA has the opportunity to reinvest in our future by utilizing these existing facilities. While costs will be incurred to modify the MFFF facilities for Pit Production, it is the wisest, safest and most economic option for our nation.

It is my hope that the selection of SRS for the plutonium pit production mission will be accomplished without delay.

Thank you for the opportunity to provide these comments.

1/5-b  
(Cont'd)



April 15, 2020

**VIA ELECTRONIC MAIL**

Ms. Jennifer Nelson  
NEPA Compliance Officer  
National Nuclear Security Administration  
Savannah River Field Office, P.O. Box A  
Aiken, South Carolina 29802  
[NEPA-SRS@srs.gov](mailto:NEPA-SRS@srs.gov)

Re: Comments on Proposed Plutonium Pit Production at Savannah River Site, Draft EIS

Dear Ms. Nelson:

The South Carolina Manufacturers Alliance (SCMA) is an organization which represents more than 400 facilities with over 80,000 employees operating and working in South Carolina. SCMA members and their respective manufacturing facilities are vital to the South Carolina economy. SCMA respectfully submits the following comments and recommendations for consideration in response to the Department of Energy (DOE) National Nuclear Security Administration (NNSA) preparation of an environmental impact statement (EIS) for plutonium pit production at the Savannah River Site (SRS).

SCMA is pleased to support NNSA's proposal to repurpose the Mixed Oxide Fuel Fabrication Facility (MFFF) at SRS to produce plutonium pits. SRS has the capacity and expertise to conduct this critical mission and can do so efficiently, safely, and with a minimal environmental impact. SRS has accessible infrastructure, including an existing waste processing structure and significant standoff zones, that makes SRS an ideal location for this project. SRS has qualified experts to conduct this operation, and SRS has demonstrated a well-established record of success and corporate responsibility by operating safely in this community for almost seven decades. SRS is also strategically located next to Fort Gordon which provides another pipeline of qualified workers. In fact, SRS has already been working with veterans from the base to provide OSHA training and prepare them for work in the civilian world after their service to our great nation. Finally, SRS can execute this undertaking while protecting the environment. SRS has no security violations and will continue to work with NNSA and other agencies to comply with all environmental laws and regulations.

The plutonium pit production initiative is critical to our national defense mission and would be a huge win for this local community and the State of South Carolina. Selecting SRS for this effort will allow our country to fulfill its objective as stated in the 2018 Nuclear Posture Review, to provide the enduring capability and capacity to produce no fewer than 80 plutonium pits per year by 2030.

I am proud to support the consideration and selection of SRS for the plutonium pit production mission and commend the SRS for its continued focus on safety and environmental stewardship.

Sincerely,

A handwritten signature in black ink that reads 'Sara Hazzard'.

Sara Hazzard  
President & CEO

1340 Bull Street Columbia, South Carolina 29201  
Phone: 803.799.9695 Fax: 803.771.8738 Website: [myscma.com](http://myscma.com) Email: [sara@myscma.com](mailto:sara@myscma.com)

1/5-b



---

**From:** Ralph Hutchison <orep@earthlink.net>  
**Sent:** Friday, April 17, 2020 7:58 AM  
**To:** NEPA-SRS@srs.gov  
**Cc:** Brian Costner  
**Subject:** [EXTERNAL] Draft SRS Pit Production EIS Comment

Ms. Nelson, et al,

I have received notice of a virtual public hearing on the the Draft Environmental Impact Statement for proposed plutonium pit mission at SRS, currently scheduled for April 30. I object in the most strenuous terms to a "virtual" public hearing and the limitations inherent in conducting such a meeting via electronic means and in a time of national emergency.

On April 1, 2020, the chairpersons of fourteen committees of the House of Representatives, including Frank Pallone, chair of the Committee on Energy and Commerce, and Adam Smith, chair of the Committee on Armed Services, wrote to Russell Vought, acting director of the Office of Management and Budget and point person for the Administration on accommodations by the government during the COVID-19 national emergency. Their letter was followed on April 8 by a similar letter signed by 24 members of the Senate. Leadership in both houses of Congress called on the Administration to *extend indefinitely all public comment periods and to reschedule public hearings and meetings.*

1/4-a.1

There is no element of the COVID-19 national emergency that requires the NNSA or the DOE to push forward with its NEPA processes across the US nuclear weapons complex while the nation and the state of South Carolina are under emergency declarations and people's lives are disrupted, including, for some, the services required to participate in a virtual public hearing: internet access and/or phone service. The collapse of the US economy has required people to make painful decisions about which bills to pay, and while many are able to preserve basic communication services, others, especially in the poorest communities, are not. Those who have relied on public access for internet connections, such as libraries and senior centers, are no longer able to access the internet because those facilities are closed. Those who purchase cell phone plans on a monthly basis have been forced to defer those purchases. It is inevitable that holding a "virtual public hearing" will exclude some persons who might otherwise choose to attend and participate.

2/4-b

It is not clear to me what parts of "national emergency" the DOE and NNSA fail to understand, but clearly the disruption of the daily lives of citizens and residents in communities impacted by your decisions is one of them. It is unconscionable that the DOE and NNSA should take advantage of this time when people's attention are necessarily diverted to matters of personal and community safety, concern for loved ones and neighbors, and the overwhelming oppressive sense of uncertainty that is underlined every time we venture out of our homes wearing masks, and every time we return home wondering if we have been exposed to a deadly virus.

There is NOTHING about this NEPA process that can not be delayed in light of the national emergency. There is EVERY REASON for the Department of Energy and NNSA to do the right thing and to adjust its schedule to provide the public a chance to participate meaningfully, as required by the National Environmental Policy Act, in the comment periods, hearings, and meetings required by the law.

3/4-a

I ask your office, the Department of Energy, and the NNSA to reconsider and to reschedule the public hearing after the conclusion of our national emergency.

2/4-b  
(Cont'd)



Thank you,  
Ralph Hutchison, coordinator  
Oak Ridge Environmental Peace Alliance



May 18, 2020

Ms. Jennifer Nelson  
NEPA Document Manager  
National Security Administration Savannah River Field Office  
P.O. Box A  
Aiken, SC 29802

RE: Draft Environmental Impact Statement (EIS) for Plutonium Pit  
Production at the Savannah River Site in South Carolina

Dear Ms. Nelson:

For many years, the Aiken Chamber of Commerce has supported new missions at the Savannah River Site. We believe in SRS for many reasons, but the safety culture and safety record is number one on my list. DOE-SR has one of the top safety records in the DOE complex. Our friends and neighbors work at the site, and their attention to safety comes home with them. At a recent neighborhood cookout, the first order of business was a safety briefing.

Obviously, the Aiken Chamber is concerned about the economics of job gain or job loss at SRS. SRS drives the economy of this region but particularly Aiken County where approximately 5,500 of their workforce lives. We know that one job at SRS equals two jobs on this side of the fence, and every job at the site supports two jobs in our communities.

Since the discussion of the Plutonium Pit Production at SRS became public, we were relieved that DOE-HQ had developed a new use for the MOX facilities and would not just board it up and walk away. That would have been a terrible waste. Instead DOE found a new use for the facilities that meets an American need, and they found the best site in America to carry it out – the Savannah River Site

On February 15, 2018, over two years ago, the Aiken Chamber of Commerce Board of Directors passed a resolution of support to locate the Plutonium Pit Production mission at SRS. Today, we continue to stand by our support.

Sincerely,

A handwritten signature in blue ink, appearing to read "J. David Jameson", is written over a horizontal line.

J. David Jameson  
President/CEO

121 Richland Ave. E  
Aiken, SC 29801  
(803) 641-1111



1/5-b

**DOE/NNSA EIS for Plutonium Pit Production Meeting, April 30, 2020**

**Summary of Telephone Comments**

**Walt Joseph**

Executive Director , SRS Heritage Foundation

I retired after 39 years at Savannah River in several departments and most areas.

I'm proud of my service at Savannah River and proud to have helped produce the nuclear materials that acted as a deterrent to prevent World War III.

I support pit production at Savannah River as a logical extension of this Cold War mission.

I applaud NNSA for holding this virtual meeting as a way of dealing with the COVID crisis and I appreciate the opportunity to participate.

We have heard many comments about safety and the environment during this meeting. Certainly, both topics must be considered for any new program. I would like to submit a few facts about these topics to support my conclusion that Savannah River is the ideal location for pit production:

Safety

IN 1952, while construction of the massive plant was at its peak, construction set three successive WORLD safety records of 4.8, 6.3 and 10.0 million hours without a lost-workday case.

The safety program was continued and strengthened as production increased and, in 1970, Savannah River safety emphasis was recognized by the Atomic Energy Commission with the AEC "Best Ever" safety award.

Safety emphasis has continued and, in 1998, the Department of Energy recognized Savannah River with the DOE "Complex Leader" award for Integrated Safety Management.

And just last year, Savannah River achieved a record 25 million safe hours.

I think we can agree that safety is a world-class tradition at Savannah River

Ecology

Baseline Studies of fields, rivers and natural radiation were begun in 1951 under contract with the Academy of Natural Sciences, the University of Georgia and the University of South Carolina.

1/5-b

These initial studies were continued and expanded and were incorporated into the Savannah River Ecology Laboratory in 1961.

In 1972 the environmental program was recognized nationally when Savannah River was designated the First National Environmental Research Park.

To date the Ecology Laboratory has produced more than 3,200 publications and work conducted at Savannah River has produced theses and dissertations that resulted in over 400 advanced degrees.

Savannah River is the most studied area in the nation.

The Ecology Laboratory is internationally recognized as evidenced by Laboratory participation in forming the International Radioecology Laboratory in Chernobyl.

Savannah River is the birthplace of modern ecology and a world leader.

Thank you for your attention.

1/5-b  
(Cont'd

---

**From:** Kahn, Henry <hkahn@emory.edu>  
**Sent:** Friday, April 17, 2020 2:04 PM  
**To:** NEPA-SRS@srs.gov; brian.costner@hq.doe.gov; bruce.diamond@nnsa.doe.gov;  
NEPA.comments@npo.doe.gov; lanlsweissa@nnsa.doe.gov  
**Subject:** [EXTERNAL] Please extend deadlines for all public and scientific commentary on  
pending DOE or NNSA construction

Dear DOE friends, -- you who are charged with protecting our environment against unnecessary catastrophes,

The current COVID-19 debacle reminds us all that humans can AND SHOULD anticipate the hazards in our future. Some adverse outcomes can be balanced against short-term gains. However, in the example of building nuclear weapons or purifying their components I cannot see any short-term gain for me, my family, or most US citizens associated with having a larger stockpile of nuclear arms.

I cannot see why protecting the profits of a few large corporations should be sufficient reason to threaten us all with poorly shielded radiation sources or potential leaks linked to earthquakes in our region

I learned today that 24 Senators have called for delaying the deadlines for commentary focused on the hazards predictable from construction plans by the Department of Energy and the National Nuclear Security Administration. I share their concern.

1/4-a.1

I will not be satisfied by virtual hearings at a time when we all, including competent scientists, are preoccupied with species survival around the COVID-19 threat. Writing as a resident of north Georgia and long-time physician in this region, I cannot allow your agencies to go ahead with projected (but unnecessary) construction at the Savannah River Site and Oak Ridge. While New Mexico is farther away, I must express serious regrets about construction proposed for Los Alamos.

2/4-b

Please – IMMEDIATELY halt the NEPA hearings to allow for the fullest expression of public comments.

**Henry S Kahn, MD, FACP**

Mobile: 404-310-3958

Professor Emeritus, Emory University School of Medicine

---

This e-mail message (including any attachments) is for the sole use of the intended recipient(s) and may contain confidential and privileged information. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this message (including any attachments) is strictly prohibited.

If you have received this message in error, please contact the sender by reply e-mail message and destroy all copies of the original message (including attachments).

---

**From:** systems@idsites.com <systems@idsites.com>  
**Sent:** Tuesday, May 12, 2020 11:28 AM  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>  
**Subject:** [EXTERNAL] Comments on Proposed Plutonium Pit Production at Savannah River Site, Draft EIS

**Name**

Ben Kinlaw

**Company Name**

Barnwell County

**Job Title**

Chairman Barnwell County Council

**Phone Number**

8034504158

**Email Address**

[bcoc5kinlaw@gmail.com](mailto:bcoc5kinlaw@gmail.com)

**Mailing Address**

93 Phillips St

**Comments**

Barnwell County is very supportive of bringing this new mission work to SRS. Most of the DOE's site is located in Barnwell County and a significant number of our residents work at this site.

Additional construction and permanent jobs will have a huge impact on our local economy

1/5-b

**From:** Kayla Kranenberg <Kayla.Kranenberg@heart.org>  
**Sent:** Thursday, April 30, 2020 5:23 PM  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>  
**Subject:** [EXTERNAL] Public Comment- PIT project & SRS

Hello,

My name is Kayla Kranenberg and I am the Executive Director for the American Heart Association-CSRA. I have worked as a community partner with SRS for the past seven years.

I am in support of the production-scale PIT project. I believe it is imperative for our country and that SRS has the capability and history of success to complete this mission in a safe, environmentally responsive manner. The Site has the existing nuclear processing infrastructure and a history of decades of safe nuclear waste management and processing.

When you arrive on site, there is no doubt that there is a phenomenal culture of safety. Every action is carefully thought through and looked at through a safety lens. I feel confident that this project would be no different and feel completely comfortable with this project moving forward.

Economically, SRS has been an incredible part of our community. On top of the thousands of employees that rely on the site, they are also the first to fill any need that is found in the community through funding and volunteerism. Their employees have a culture of social responsibility and are incredibly giving of their time, talent and treasures. This project would have the opportunity to bring more positions into our community- which is so needed in this critical time. I feel like this will not only benefit the employees and company but also many other regional businesses and community partners.

Thank you!



**Kayla Kranenberg**  
Executive Director  
American Heart Association  
516 West Avenue | North Augusta | SC | 29841  
☎ 803-341-9799 | 📠 803-422-3204

1/5-b

---

**From:** Pete LaBerge <pete.laberge@gmail.com>  
**Sent:** Tuesday, April 14, 2020 6:50 PM  
**To:** Lisa E Gordon-Hagerty <lisa.gordon-hagerty@nnsa.doe.gov>; Bruce M Diamond <bruce.diamond@nnsa.doe.gov>; TheSecretary <The.Secretary@hq.doe.gov>  
**Cc:** NEPA-SRS <NEPA-SRS@srs.gov>  
**Subject:** [EXTERNAL] Please extend comment period on draft EIS for SRS Plutonium Bomb Plant

Mr. Dan Brouillette  
Secretary of Energy  
United States Department of Energy  
1000 Independence Ave., SW  
Washington, D.C. 20585  
[The.Secretary@hq.doe.gov](mailto:The.Secretary@hq.doe.gov)

Ms. Lisa E. Gordon-Hagerty  
Administrator  
National Nuclear Security Administration  
1000 Independence Ave., SW  
Washington, D.C. 20585  
[Lisa.Gordon-Hagerty@nnsa.doe.gov](mailto:Lisa.Gordon-Hagerty@nnsa.doe.gov)

Mr. Bruce M Diamond  
General Counsel  
National Nuclear Security Administration  
1000 Independence Ave., SW  
Washington, D.C. 20585  
[Bruce.Diamond@nnsa.doe.gov](mailto:Bruce.Diamond@nnsa.doe.gov)

April 14, 2020

[Request for Extension of Comment Period on the Draft Environmental Impact Statement for Plutonium Pit Production at the Savannah River Site in South Carolina](#)

Dear Secretary Brouillette, Administrator Gordon-Hagerty and Mr. Diamond,

I am writing to you concerning the "Draft Environmental Impact Statement for Plutonium Pit Production at the Savannah River Site. I am a concerned citizen and near neighbor to SRS, living just a few miles from SRS, in Windsor, SC. For the past three weeks, my wife and I have been sheltering-in-place at our home to avoid exposure to Coronavirus. I

1/4-a



expect to provide written comments listing a number of concerns about proposed Plutonium Pit Production. As a close neighbor to SRS, we share the same aquifer. It doesn't appear to me that your Draft Statement adequately addresses the likelihood that there will radiation releases into the air, ground or groundwater as was experienced at Rocky Flats, CO. Sadly, I cannot turn my full attention to elucidating these and other concerns, while doing everything possible not to contract a highly contagious and life-threatening virus. I'm sure you appreciate the opinions of affected local residents, so please consider extension of the comment period, to conform with all other like meetings that have been postponed and most businesses that are closed. In conclusion, I request an extension of the comment period to approximately June 30. Thank you for your response to me at the email address below.

1/4-a

Sincerely,

*Pete LaBerge*  
180 Colbert Bridge Rd.  
Windsor, SC 29856  
[pete.laberge@gmail.com](mailto:pete.laberge@gmail.com)

Cc: Ms. Jennifer Nelson, NEPA Compliance Officer, National Nuclear Security Administration Savannah River Field Office, P.O. Box A, Aiken, SC 29802, email: [NEPA-SRS@srs.gov](mailto:NEPA-SRS@srs.gov). Please include this letter in the record of the draft EIS.

---

**From:** Elizabeth Merritt <cmonadirector@comcast.net>  
**Sent:** Wednesday, April 22, 2020 11:22 AM  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>  
**Subject:** [EXTERNAL] Support for potential plutonium processing mission

**Public support of the potential plutonium processing mission at SRS**

I am thrilled to hear about the potential plutonium processing mission at Savannah River Site and the jobs that it will bring to the Central Savannah River Area. I have lived in North Augusta the majority of my life, and so many of my childhood friends had parents who worked at SRS. It has always been such a strong part of our community, and as executive director of Community Ministry of North Augusta, I can speak directly about the wonderful support and involvement that SRNS has shown to us and other nonprofit organizations in this area. The culture of safety and environmental responsibility is to be applauded. I look forward to the positive effect that a new mission and new jobs will have on our region and its economy!

1/5-b

Sincerely,

Elizabeth Merritt

Executive Director

Community Ministry of North Augusta

PO Box 7152

North Augusta, SC 29861

803-279-5771

[cmonadirector@comcast.net](mailto:cmonadirector@comcast.net)

[www.cmona.org](http://www.cmona.org)

*Physical address: 646 East Buena Vista Avenue, North Augusta, SC 29841*



PO BOX 850, 2748 Wagener Road, Alken, SC 29802  
P | 803-649-7981  
F | 803-649-2248  
www.lscog.org

April 30, 2020

Re: Comments on Proposed Plutonium Pit Production at Savannah River Site, Draft EIS

Dear Ms. Nelson:

As the Executive Director of the Lower Savannah Council of Governments, I am responsible for many governmental programs in the region, including workforce development. We operate the SC Works offices and focus on ensuring an educated workforce and job opportunities in the region. My comments below are in response to the Department of Energy (DOE) National Nuclear Security Administration (NNSA) preparation of its environmental impact statement for plutonium pit production at the Savannah River Site (SRS).

I support NNSA's proposal to repurpose the Mixed Oxide Fuel Fabrication Facility (MFFF) at SRS to produce plutonium pits, restoring an imperative manufacturing capability for our nation and bringing much-needed jobs to our region. The CSRA relies on Savannah River Site for its economic impact. With approximately 11,000 jobs at SRS, it is our region's largest employer and purchases an additional \$400 million in goods from the community over the roughly \$2 billion annually they spend.

The EIS shows that SRS has the talent and capacity to conduct the proposed plutonium pit production that is vital to our nation defense mission. Moreover, we can do so safely, efficiently, and with a minimal environmental impact. The Site has existing nuclear processing infrastructure, plus significant land buffer zones, that makes it a secure, ideal location for this project. SRS site security is world recognized for its safety record and received a 97% rating in their last review (January 2020). Nowhere else in the DOE Complex will you find such an isolated large site (over 300 square miles) that is still easily accessible for large-scale construction near a population that can provide the necessary skilled workforce.

SRS has a well-established record of responsibility operating safely for 70 years, and Site experience in repurposing site facilities for new missions (K Area, L Basin, H Canyon) prove SRS can repurpose the MFFF production facilities and get a return on taxpayer investment. After the hundreds of millions spent to build the now mothballed facility, it only makes sense to try to recoup some of this money by utilizing it for a new mission. Finally, SRS can execute this mission while protecting the environment: SRS has an excellent manufacturing safety culture and can operate this new mission in compliance with all environmental laws and regulations.

Selecting SRS for this effort will meet the objective in the 2018 Nuclear Posture Review, to provide "an effective, responsive, and resilient nuclear weapons infrastructure" for the enduring capability and capacity for both SRS and Los Alamos National Laboratory to produce no fewer than 80 plutonium pits per year by 2030.

Serving the counties of: Alken ~ Allendale ~ Bamberg ~ Barnwell ~ Calhoun ~ Orangeburg

1/5-b

I am proud to support the consideration and selection of SRS for the plutonium pit production mission and commend DOE and SRS for its continued focus on safety and environmental stewardship in South Carolina in service to our nation.

Thank you for the opportunity to provide these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "W. Molnar", followed by a long horizontal line extending to the right.

William Molnar, Ph.D.  
Executive Director

1/5-b  
(Cont'd)

**From:** systems@idsites.com <systems@idsites.com>  
**Sent:** Wednesday, May 6, 2020 11:03 AM  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>  
**Subject:** [EXTERNAL] Comments on Proposed Plutonium Pit Production at Savannah River Site, Draft EIS

**Name**

Earl Morrison

**Company Name**

USC student and DOE,

**Job Title**

Grad Student, NE - at SRS, Power Program Manager

**Phone Number**

803-316-1350

**Email Address**

[emorrisonk@GMAIL.COM](mailto:emorrisonk@GMAIL.COM)

**Mailing Address**

1490 Garland Rd, Gable, SC 29051

**Comments**

SRS needs the Plutonium Pit Production to better support the operation of removing nuclear waste at SRS. The waste is turned into glass to prevent leakage of liquid waste. The glass waste is stored at SRS. The waste should be sent to Yucca Mountain. By bring an important project like Plutonium Pit Production to SRS, the spotlight on the waste is increased. America needs to act to permanently locate waste at the best location, witch is Yucca Mountain. The Plutonium Pit Production located at SRS will benefit all of America, not just SC or SRS.

1/5-b

---

**From:** CLMunns <clmunns@aol.com>  
**Sent:** Friday, May 1, 2020 2:12 PM  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>  
**Subject:** [EXTERNAL] Pu Pit Production at Savannah River Site Draft EIS

Dear Ms Nelson –

This email is to submit comments on the subject Draft EIS. Thank you for listening to our community.

I fully support that our nation should use the Savannah River Site (SRS) for production of Pu Pits.

I am an Aiken resident and have been so for more than 10 years. I was a previous President and CEO of the managing company for the SRS M&O, and so I fully understand the site, the men and women who work there, the safety procedures and nuclear safety culture of the site, and the potential for what can get done.

I have spent nearly 40 years as a naval nuclear trained officer. Now retired from active duty I have been recently selected by the Secretary of Defense to work on a Strategic Advisory Board for US Strategic Command; and can validate the National Security imperative for our Nation to re-start our Pit refurbishment mechanisms. We absolutely need to be working right now on both the capability and capacity to refurbish at least 80 pits per year.

The SRS is good choice for this task. It has:

- the Geography for nuclear work... more than 300 square miles of secure, guarded and monitored space and facilities.
- the geology for nuclear work... one of the best studied plots of land in the nation and having been monitored for many years.
- The facilities for this task... the new and former MOX building and many detailed support structures already in use for current nuclear work
- The Culture for nuclear work... working on nuclear materials takes a very special culture. The SRS has perfected and finely tuned this nuclear manufacturing culture for both safety and operations over many years.
- The state, region and site with effective, productive and well established good working relationships with the regulators, the community, with state and local government entities and the general populace.
- The Work force to safely do this task.

In summary, SRS and surrounding community have the capability and capacity to safely, productively and professionally perform this important task.

I fully support EIS approval and continuation of the project.

Thank you,  
Charles Munns

Vice Admiral USN (ret)  
Aiken resident.

---

**From:** systems@idsites.com <systems@idsites.com>  
**Sent:** Thursday, May 7, 2020 5:26 PM  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>  
**Subject:** [EXTERNAL] Comments on Proposed Plutonium Pit Production at Savannah River Site, Draft EIS

**Name**

Joseph F Ortaldo

**Company Name**

Retired

**Job Title**

Engineering Manager

**Phone Number**

8036490227

**Email Address**

[rosjoeo@aol.com](mailto:rosjoeo@aol.com)

**Mailing Address**

126 Sporthorse Ln Aiken SC 29803

**Comments**

SRS has always performed well for 75 years

| 1/5-b



-----Original Message-----

From: ORick Osbon <ROsbon@CityofAikenSC.gov>  
Sent: Thursday, April 30, 2020 6:53 PM  
To: NEPA-SRS <NEPA-SRS@srs.gov>  
Subject: [EXTERNAL] PUBLIC COMMENTS ON DRAFT EIS

On April 30, 2020 I delivered the following comments to the WebEx hosted public hearing about Pit Production Mission at SRS:

Good evening,

I am Rick Osbon and I have the honor of serving as the Mayor for the City Aiken. Tonight I would like to speak in support of the Plutonium Pit Production mission at Savannah River Site.

Aiken is a city with a population of 32,000, steeped in a Southern charm that offers the cultural opportunities of a larger community. We are also the home to over 45% of the current SRS employees and many of the site retirees.

Our population for seven decades has supported the national security needs of our country. There is a large sense of patriotism and pride in our City. We have confidence in the proven safety records of the Savannah River Site, and a deep seeded trust in it's workforce, seventy years worth of trust.

SRS has a unique place in the DOE complex with a track record of safety and success! It is a site that produces results.

Production-scale pit manufacturing, a capability the nation has not had for decades, was deemed imperative in the nation's 2018 Nuclear Posture Review. SRS can deliver the stated intent of the 2018 Nuclear Posture Review, to provide "an effective, responsive, and resilient nuclear weapons infrastructure [that can] adapt flexibly to shifting requirements."

On January 8th 2018, the Aiken City Council unanimously passed a resolution supporting the plutonium pit production at Savannah River Site. As a community, we are supportive of joining Los Alamos in a partnership to produce the pits that are needed to meet our National security goals.

Savannah River Site and the citizens of Aiken have been keeping our nation safe for 70 years. I believe the dual track pit production delivers a solid answer to the needs stated in the 2018 Nuclear Posture Review and I strongly support and encourage moving forward with Savannah River Site as a facility to meet this crucial need facing our country.

Thank you for your time and I hope everyone stays safe!

Rick Osbon, Mayor  
City of Aiken

1/5-b

-----Original Message-----

From: Lewis Patrie <patric.wncpsr@main.nc.us>  
Sent: Sunday, May 3, 2020 10:08 AM  
To: NEPA-SRS <NEPA-SRS@srs.gov>  
Cc: L & J Patrie <patric.wncpsr@main.nc.us>  
Subject: [EXTERNAL] Draft SRS Pit Production EIS Comment

Greetings,

I am among the many who are strongly opposed to plans for nuclear weapons' pit production at Savanna River Site. There is no credible justification for nuclear weapons, especially more of them, when they threaten survival of we, the human species of earth's inhabitants. We are ever increasingly at risk of self destruction from those in existence, without adding more to those already imperiling human existence, as documented by the Doomsday Clock of the Bulletin of the Atomic Scientists, which has just advanced the hands of their clock to 100 seconds before midnight.

1/5-a

Lewis E. Patrie, M. D.  
26 Wesley Drive, Apt H  
Asheville, N. C. 28803  
828 285-2599  
patric.wncpsr@main.nc.us

---

**From:** Richard and Janis Peacock <rjpeacock@wowway.com>  
**Sent:** Monday, April 20, 2020 10:21 AM  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>; Brian.Costner@hg.doe.gov; Bruce M Diamond <bruce.diamond@nnsa.doe.gov>; NEPA.comments@npo.doe.gov; lanlsweissa@nnsa.doe.gov  
**Subject:** [EXTERNAL] Extend Time for Public Comments

Greetings,

Please extend the timeline for public comments on the nuclear issues that are before you. The public deserves the opportunity to be heard after the shut down of our lives due to Covid 19. We are focused on safety at this time and deserve more time to expressed our understandings in the future. Please be safe and allow us to be concentrate on safety as well.

Respectfully,

Rev. Rich Peacock  
Sterling Heights, MI

1/4-a



100 Exchange Avenue  
North Augusta, SC  
29841-0843  
  
Post Office Box 0400  
North Augusta, SC  
29841-0400

City of North Augusta

Ms. Jennifer Nelson  
NEPA Compliance Officer  
National Nuclear Security Administration  
Savannah River Field Office, P.O. Box A  
Aiken, SC 29802

May 1, 2020

Dear Ms. Nelson,

I'm pleased to provide this letter of support for the Proposed Plutonium Pit Production at Savannah River Site, Draft EIS.

Let me begin by stating maintaining the national capability to keep our nuclear weapons arsenal current must be a top goal for our nation, and governments at every level must support that goal. Our nation cannot let an essential capability be left unfilled. Continuity is key. During my assignment at Robins AFB, one of five Air Force aircraft logistics centers, a major effort was focused on keeping essential manufacturing firms viable to provide aircraft parts critical to sustaining our defense posture. That focus directly relates to my comments.

Unfortunately, production-scale pit manufacturing does not exist in the United States. This is a critical capability this nation absolutely must regenerate. The 2018 Nuclear Posture Review strongly confirmed this need. SRS can provide that essential capability. The City Council of North Augusta supports establishing this National Defense Mission at the Savannah River Site. Having a redundant capability at Los Alamos National Lab clearly makes sense.

Savannah River Site has been in the nuclear business for 70 years. That demonstrates it has the talent, resources and the infrastructure to successfully process nuclear materials, including plutonium and the on-going tritium mission. SRS, along with the Savannah River National Laboratory, has a long history of plant operations with plutonium and other nuclear materials.

Quite simply, it's the workers who are crucial to getting any job done and done safely. Experience in performing this type of work is available right now at SRS. The safety culture is ingrained and supported by the record. Employees have proven adaptable to new missions and tasks, the reality for the last two decades.

1/5-b

<b>Administration</b> PH: 803.441.4200 TX: 803.441.4200	<b>Planning &amp; Community Development</b> PH: 803.441.3221 TX: 803.441.4002	<b>Engineering &amp; Public Works</b> PH: 803.441.4221 TX: 803.441.4200	<b>Building Division</b> PH: 803.441.4227 TX: 803.441.4222	<b>Finance</b> PH: 803.441.4215 TX: 803.441.4100	<b>Parks, Recreation &amp; Landmarks Services</b> PH: 803.441.3344 TX: 803.441.4100	<b>Human Resources</b> PH: 803.441.4200 TX: 803.441.4200	<b>Public Utilities</b> PH: 803.441.4200 TX: 803.441.4200
---	---	---	--	--	---	--	---

[www.northaugusta.net](http://www.northaugusta.net)



City of North Augusta

SRS employees have the requisite knowledge, proven skills and safety mindset. These capabilities simply reinforce the point that the Savannah River Site is the logical location for this new mission.

From the City of North Augusta's perspective, the Savannah River Site has been an important community partner. The economic impact is a driver to our success. SRS employees live in our city. Local businesses benefit from the approximate \$500 million purchases locally of supplies and services. An estimated 2,000 jobs will be created during peak construction. Upon completion, these construction jobs will be replaced with 2,400 new direct mission jobs and indirect support jobs.

This new mission is important to North Augusta residents. The impacts from new job opportunities, workforce education, and business stability are essential to improving the quality of life for North Augusta residents.

Thank you for the opportunity to support the Savannah River Site and the new Production-Scale Plutonium Pit mission.

Bob Pettit  
Mayor  
City of North Augusta  
100 Georgia Avenue  
North Augusta, SC 29841

1/5-b  
(Cont'd)

Comments – EIS Public Hearing – April 30, 2020

Good evening, my name is Sharon L. Rodgers and I am the President of the United Way of Aiken County. I have lived in Aiken County for almost forty years.

This year marks the 70<sup>th</sup> anniversary of SRS in Aiken County. United Way of Aiken County owes its very existence to SRS.

At this critical time in our nation's history, United Way of Aiken County is proud to support SRS to be considered for the Plutonium Pit Production mission and for our community to host such an important national security mission. Why SRS? Quite simply, SRS has been operating safely in our community for 70 years and has been involved with nuclear materials since inception and plutonium for many decades. SRS has the experience and technical knowledge. SRS has the benefit of an enormous campus to expand facilities for the project and the capability to safely perform this mission.

Moreover, SRS has the talent and resources to provide an effective, responsive and resilient nuclear weapons infrastructure and the flexibility to respond to changing requirements.

SRS employees have been successfully and safely executing its mission for 70 years. SRS has a world-class safety culture and has operated 24/7 for 70 years.

Aiken County welcomes this new mission which will provide construction and operations employment opportunities and investments that will benefit our region.

Lastly, SRS contractors and employees are active and engaged partners in our community. They are our go-to supporters. They are our largest contributor, helping to support 30 partner agencies and 45 critical need programs, including vulnerable seniors, children, disabled, underemployed and people in crisis. They provide the three Ts; Time, Talent, Treasure and Testimony. This year, over 300 volunteers worked at 27 different sites during our day of caring. These volunteers serve as Board members and committee members. They help support our schools and provide our community with many resources.

I am honored to support SRS. They care about our community and their mission to make the world safer. Thank you!

1/5-b

---

**From:** Francine Schwarzenberger <Francineop@msn.com>  
**Sent:** Friday, April 17, 2020 1:52 PM  
**To:** NEPA-SRS@srs.gov  
**Subject:** [EXTERNAL] Stop the bomb making

It is time to stop the bomb making and protect workers. Secondly, it is time to stop bomb making FOREVER! Who is healthier because we are taking money that could be used for many other worthwhile causes, such as funding for all the people who are without work at this time!

Let goodness and peace reign!

1/5-a

*All the darkness in the world cannot extinguish the light of a single candle. Francis of Assisi*  
Francine Schwarzenberger OP  
Work : 620-792-1232 Ext. 105

---

**From:** Alice Slater <alicejslater@gmail.com>  
**Sent:** Saturday, April 18, 2020 4:35 AM  
**To:** NEPA-SRS@srs.gov  
**Cc:** Brian Costner; Ralph Hutchison  
**Subject:** [EXTERNAL] Draft SRS Pit Production EIS Comment

Ms. Nelson, et al,

I have received notice of a virtual public hearing on the the Draft Environmental Impact Statement for proposed plutonium pit mission at SRS, currently scheduled for April 30. I object in the most strenuous terms to a "virtual" public hearing and the limitations inherent in conducting such a meeting via electronic means and in a time of national emergency.

On April 1, 2020, the chairpersons of fourteen committees of the House of Representatives, including Frank Pallone, chair of the Committee on Energy and Commerce, and Adam Smith, chair of the Committee on Armed Services, wrote to Russell Vought, acting director of the Office of Management and Budget and point person for the Administration on accommodations by the government during the COVID-19 national emergency. Their letter was followed on April 8 by a similar letter signed by 24 members of the Senate. Leadership in both houses of Congress called on the Administration to *extend indefinitely all public comment periods and to reschedule public hearings and meetings.*

1/4-a.1

There is no element of the COVID-19 national emergency that requires the NNSA or the DOE to push forward with its NEPA processes across the US nuclear weapons complex while the nation and the state of South Carolina are under emergency declarations and people's lives are disrupted, including, for some, the services required to participate in a virtual public hearing: internet access and/or phone service. The collapse of the US economy has required people to make painful decisions about which bills to pay, and while many are able to preserve basic communication services, others, especially in the poorest communities, are not. Those who have relied on public access for internet connections, such as libraries and senior centers, are no longer able to access the internet because those facilities are closed. Those who purchase cell phone plans on a monthly basis have been forced to defer those purchases. It is inevitable that holding a "virtual public hearing" will exclude some persons who might otherwise choose to attend and participate.

2/4-b

It is not clear to me what parts of "national emergency" the DOE and NNSA fail to understand, but clearly the disruption of the daily lives of citizens and residents in communities impacted by your decisions is one of them. It is unconscionable that the DOE and NNSA should take advantage of this time when people's attention are necessarily diverted to matters of personal and community safety, concern for loved ones and neighbors, and the overwhelming oppressive sense of uncertainty that is underlined every time we venture out of our homes wearing masks, and every time we return home wondering if we have been exposed to a deadly virus.

There is NOTHING about this NEPA process that can not be delayed in light of the national emergency. There is EVERY REASON for the Department of Energy and NNSA to do the right thing and to adjust its schedule to provide the public a chance to participate meaningfully, as required by the National Environmental Policy Act, in the comment periods, hearings, and meetings required by the law.

3/4-a

I ask your office, the Department of Energy, and the NNSA to reconsider and to reschedule the public hearing after the conclusion of our national emergency.

2/4-b  
(Cont'd)

Thank you,  
Ralph Hutchison, coordinator  
Oak Ridge Environmental Peace Alliance

I fully support this letter and the call for an immediate postponement of the virtual public hearing designed to push through the construction of new nuclear bomb plants at a time when people are dying all over the world from a new plague. This is hardly the time to be streaming full speed ahead to make new weapons of lethal mass destruction when we have to deal with another kind of mass destruction immediately.



Alice Slater  
446 E 86 St  
New York NY 10028  
212-744-2005  
646-238-9000(mobile)  
[www.wagingpeace.org](http://www.wagingpeace.org)  
[www.worldbeyondwar.org](http://www.worldbeyondwar.org)

*We may now care for each Earthian individual at a sustainable billionaire's level of affluence while living exclusively on less than 1 percent of our planet's daily energy income from our cosmically designed nuclear reactor, the Sun, optimally located 92 million safe miles away from us. Buckminster Fuller*



Friday, March 20, 2020

Dear MESA Customer,

In response to the recent ORDER OF THE LOCAL HEALTH OFFICER of Orange County effective Tuesday, March 17, 2020, MESA International Technologies, Inc. shall remain open pursuant to Section 1.b. i, ii, iii, vii, xiii, xvii and shall exceed Section c by maintaining a 10 foot social distance from all persons. In addition, MESA shall close its facility to all public access during this time. MESA products are both directly and indirectly supplied to companies throughout the world requiring immediate and continuous support through this global crisis.

MESA manufactures vital consumable product and supplies under Section 1.b. i, ii, iii, viii, xiii, xvii as follows:

1.b.i MESA supplies critical government agencies consumable calibration standards required for operation of multiple government essential services including but not limited to; local and county and state fire, local and county water districts, local and county wastewater treatment plants, multiple US National Laboratories, Department of Defense, all branches of the US military, multiple federal, state and local health and safety agencies that all required to provide for the health, safety and welfare of the public.

The preceding list comprises just a partial list of the facilities and agencies we supply under Section 1.b.i

MESA US Department of Defense CAGE code is listed below for your reference.

**MESA CAGE CODE: 3SCZ5**

Section 1.b.ii MESA supplies consumable standards to multiple healthcare facilities, medical device manufacturers and essential healthcare infrastructure. The most notable supply connected with the current emergency includes a contractual agreement with Beyond Air and their LungFit™ system treatment. See partial press release excerpts below:

**March 13, 2019**

Beyond Air Inc. [NAIR -17.16%](#) said Monday that it submitted an investigational device exemption to the Food and Drug Administration (FDA) as it seeks authority to market its nitric oxide device to treat patients with COVID-19. The device, which is called the LungFit™ BRO system, has not been approved by the FDA for any reason. However, the company said in a statement that it believes it could be "a significant tool in the battle against this coronavirus" and that it is interested in testing the device in an open-label study of 75 patients who have been hospitalized with COVID-19.

1/8-a

**March 18, 2020**

Beyond Air Accelerates LungFit™ BRO COVID-19 Program Prepared to test LungFit™ BRO in COVID-19 patients in a clinical study starting in April pending FDA approval of recently submitted IDE (investigational device exemption)

**November 25, 2019**

Beyond Air Signs Agreement with MESA Specialty Gases & Equipment for Nitric Oxide and Nitrogen Dioxide Calibration Gas Supply for use with its LungFit™ product line.

Key Highlights

- Five year term begins on the earlier of FDA approval for the LungFit™ systems or December 31, 2020
- Beyond Air will be responsible for the initial and future costs for adjustments to MESA facilities to meet capacity requirements
- Beyond Air has the option to have MESA design and operate a calibration gas manufacturing facility dedicated to Beyond Air
- Agreement is exclusive on a global basis to both companies

Section 1.b.iii MESA supplies multiple first responders and emergency management personnel with front line consumable products required to evaluate and protect the public from multiple threats. These products are required to evaluate and warn personnel in the event of toxic exposure to multiple threats including but not limited to:

Ammonia  
Carbon Monoxide  
Chlorine  
Ethylene Oxide  
Hydrogen Sulfide  
Hydrochloric Acid  
Hydrogen Cyanide  
Hydrogen Chloride  
Nitric Oxide  
Nitrogen Dioxide  
Oxygen Depletion  
Phosgene  
Sulfur Dioxide  
Sulfuryl Fluoride

These are some, but not all of the exposure elements requiring our product line. Our calibration standards are used to meet function test requirements and calibration requirements by first responders and emergency management personnel.

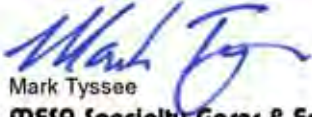
Section 1..b.viii MESA is a dedicated supplier to Veeder-Root and VST testing kits required by all gas stations in the State of California to use to monitor and evaluate dangerous gas tank leaking.

1/8-a  
(Cont'd)

Section 1.b.xiii MESA supplies multiple universities products specific for the function of distance learning and the performance of essential functions.

Section 2.b.xvii Finally, as demonstrated above, MESA clearly supplies other essential businesses with the support or supplies necessary to operate. These supplies are both directly and indirectly supplied to companies throughout the world requiring immediate and continuous support through this global crisis.

Sincerely,



Mark Tyssee

**MESA Specialty Gases & Equipment**

mtyssee@mesagas.com

TEL: (714) 434-7102; FAX: (714) 434-8006

[www.mesagas.com](http://www.mesagas.com)

1/8-a  
(Cont'd)

---

**From:** David Vovakes <vovakes1@verizon.net>  
**Sent:** Tuesday, April 28, 2020 11:24 AM  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>  
**Subject:** [EXTERNAL] DEIS Comments

Ms. Jennifer Nelson, NEPA Document Manager  
National Nuclear Security Administration  
Savannah River Field Office

Good morning Ms. Nelson:

On November 19, 2019 at a meeting of the (Department of Energy, Office of Environmental Management) Savannah River Site Citizens Advisory Board (SRS CAB) in Augusta, Georgia, Mr. John Lopez, Director, Office of Integration and Planning gave a presentation titled: Screening and Evaluating Land Use and Resource Requests at Savannah River Site (SRS). Mr. Lopez noted that all SRS land is owned and controlled by the U.S. Department of Energy. Two important Site Use Planning Assumptions were stated:

1. Upon completion of environmental cleanup and nuclear materials disposition missions, long-term environmental monitoring responsibilities will be released to another DOE Program Secretarial Office.
- 2. The National Nuclear Security Administration (NNSA) Defense Programs will continue as an enduring mission.**

As reported in the Aiken Standard newspaper on January, 9, 2020: The National Nuclear Security Administration has concluded it does not need to further examine the broader, nationwide environmental repercussions of plutonium pit production. In a federal notice, the NNSA, the U.S. Department of Energy's weapons-and-nonproliferation arm, announced no more National Environmental Policy Act "documentation at a programmatic level is required."

Today, the various committees within the SRS CAB meet to discuss environmental management issues involving the Savannah River Site and its impact on the surrounding Central Savannah River Area (CSRA). To my knowledge, the CSRA is not currently represented by a diverse group of citizens to communicate community views regarding NNSA environmental management issues.

Community stakeholders have an essential responsibility to the citizens they serve. I respectfully request that DOE grant the necessary authority to form an advisory board to offer advice and make recommendations concerning issues affecting NNSA programs at the Savannah River Site.

David Vovakes  
105 White Birch Court

Aiken, SC 29803

-----Original Message-----

From: Carolyn Williams <clswil@icloud.com>

Sent: Thursday, April 30, 2020 6:34 PM

To: NEPA-SRS <NEPA-SRS@srs.gov>

Subject: [EXTERNAL] Pit Mission

SRS operates with safety being top priority. Employees are capable is addressing this mission with safety and expertise. The excellent efficiency track record of SRS demonstrates the excellent qualifications of their workforce. Additionally this mission would be advantageous to our rural community workforce within the CSRA and enabling our counties to provide meaningful employment to our citizens .  
Southern Regional Chamber of Commerce fully supports this mission.

1/5-b

Sent from my iPhone

---

**From:** Joanne Williams <joanne29206@yahoo.com>  
**Sent:** Sunday, April 5, 2020 12:21 PM  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>  
**Cc:** Peter DeLorme <peterdelorme@bellsouth.net>  
**Subject:** [EXTERNAL] Comments: Draft EIS - pit production SRS

Ms. Jennifer Nelson  
NEPA Compliance Officer  
National Nuclear Security Administration  
Savannah River Field Office

April 5 2020

RE: Draft EIS Expanded Pit Production

The United States adversary China just today sent 1,000 ventilators to New York. This is today's method of fighting. The current hand grenade is interrupted supply-chains. Today's enemies afflict us all.

The old way, exactly 75 years old, was dropping a nuclear bomb to obliterate people. For a while "we believed" it had to be done to end a war. Then, we clung to the bomb pretending it was for deterrence and made us safer. Now it's about jobs – plain and simple. Big money – tight grip.

The NNSA can go through the litany of why nuclear weapons need updating, why a stockpile nuclear parts need to be expanded or redesigned. It is all beside the point. That way of thinking, that way of arming is about as useful as horsemen with swords. However, for those who need a security blanket, there is already storehouse with weapons good for years to come.

Any nuclear bomb making weakens us. It depletes our treasury, while increasing our national debt, as our citizens struggle to provide for their basic needs. That does anything but strengthen our national security.

Sincerely,  
Joanne Williams  
6436 Sylvan Drive  
Columbia SC 29206  
803-606-7107

1/5-a



---

**From:** systems@idsites.com <systems@idsites.com>  
**Sent:** Thursday, May 7, 2020 11:49 AM  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>  
**Subject:** [EXTERNAL] Comments on Proposed Plutonium Pit Production at Savannah River Site, Draft EIS

**Name**

Keith Wood

**Company Name**

Amentum

**Job Title**

VP Marketing & Communications

**Phone Number**

803-507-2332

**Email Address**

[keithwood@bellsouth.net](mailto:keithwood@bellsouth.net)

**Mailing Address**

19 Inverness Street E, Aiken, SC 29803

**Comments**

I support this mission at SRS. The site is well positioned to successfully execute this Pu Pit fabrication mission.

1/5-b

**From:** [Richard Denton](#)  
**To:** [Secretary Brouillette](#); [Gordon-Hagerty, Lisa](#); [Diamond, Bruce](#)  
**Subject:** [EXTERNAL] Request for Extension of Comment Period  
**Date:** Thursday, April 16, 2020 11:43:05 AM

---

Dr. Richard Denton, MD Emeritus

[rdenton@nosm.ca](mailto:rdenton@nosm.ca)

Thursday, April 16, 2020

Mr. Dan Brouillette, Secretary of Energy, United States Department of Energy

[The.Secretary@hq.doe.gov](mailto:The.Secretary@hq.doe.gov)

Ms. Lisa E. Gordon-Hagerty, Administrator, National Nuclear Security Administration

[Lisa.Gordon-Hagerty@nnsa.doe.gov](mailto:Lisa.Gordon-Hagerty@nnsa.doe.gov)

Mr. Bruce M Diamond, General Counsel, National Nuclear Security Administration

[Bruce.Diamond@nnsa.doe.gov](mailto:Bruce.Diamond@nnsa.doe.gov)

Dear Secretary Brouillette, Administrator Gordon-Hagerty and Mr. Diamond,

[Request for Extension of Comment Period on the Draft Environmental Impact Statement for Plutonium Pit Production at the Savannah River Site in South Carolina](#)

Due to the Covid-19 pandemic that we are currently facing, I would like to recommend that you give an extension for public comment on the Environmental Impact Statement for Plutonium Pit Production at the Savannah River Site in South Carolina. Other departments are doing this and this is a very important matter of looking at the risks of radiation from plutonium.

I therefore request a 45 day approximate extension to say June 30<sup>th</sup>. I look forward to your response.

Sincerely

Richard Denton, chair of Rotarians4Nuclear Ban

1/4-a



### AIKEN COUNTY LEGISLATIVE DELEGATION

1930 University Parkway, Suite 3600-A  
Aiken, South Carolina 29801  
Phone: (803) 642-1694  
May 13, 2020

**Via Email and U.S. Mail**

Ms. Jennifer Nelson, NEPA Document Manager  
National Nuclear Security Administration, Savannah River Field Office  
P.O. Box A  
Aiken, SC 29802

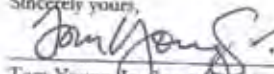
Re: Notice of Intent -- Plutonium Pit Production Expansion -- Savannah River Site

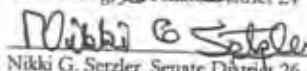
Dear Ms. Nelson:

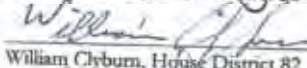
Please accept this letter in support of the Savannah River Site (SRS) being the location chosen for the expansion of the national Plutonium Pit Production mission. SRS has a longstanding history for nearly seventy years of providing a highly skilled workforce to support national security missions. Additionally, our two-state region is uniquely situated to offer the trained workforce and the education pipeline which are necessary to support the successful operation of this important national security mission. Further, with its safety and environmental protection record and expertise in both the nuclear and national security fields, we are confident of SRS's ability to manage and successfully implement the Plutonium Pit Production mission.

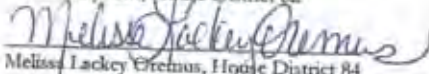
In view of the above, we, the undersigned members of the Aiken County Legislative Delegation, support the expansion of the national Plutonium Pit Production mission to the Savannah River Site, and we request that the Department of Energy and the National Nuclear Security Administration approve this expansion. We join with the many other elected officials in the communities that we represent in supporting this vital mission's expansion to SRS.

Sincerely yours,

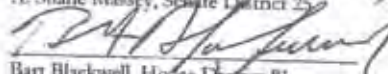
  
Tom Young, Jr., Senate District 24

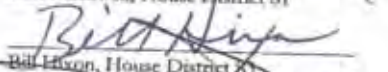
  
Nikki G. Setzler, Senate District 26

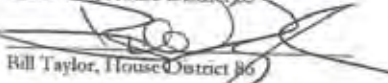
  
William Clyburn, House District 82

  
Melissa Lackey Eremus, House District 84

  
A. Shane Massey, Senate District 25

  
Bart Blackwell, House District 81

  
Bill Hixon, House District 80

  
Bill Taylor, House District 86

cc: The Honorable Lindsey Graham, The Honorable Tim Scott, The Honorable Joe Wilson,  
The Honorable Jim Clyburn, The Honorable Henry McMaster, and The Honorable Rick Perry

1/5-b

---

**From:** systems@idsites.com <systems@idsites.com>  
**Sent:** Wednesday, May 13, 2020 6:03 PM  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>  
**Subject:** [EXTERNAL] Comments on Proposed Plutonium Pit Production at Savannah River Site, Draft EIS

**Name**

Barry Moore

**Company Name**

Walker Accounting and Tax Service

**Job Title**

COO

**Phone Number**

8435496000

**Email Address**

[Barry.Moore@walkertax.com](mailto:Barry.Moore@walkertax.com)

**Mailing Address**

1476 Jefferies Highway

**Comments**

Since inception, the SRS has had a significant positive impact for our region of South Carolina. Re-purposing (continuing to re-invent) as times change and for the future is smart, sensible, and shows good stewardship of tax dollars. Additionally, the prospective employment numbers will be a game changer for area residents.

1/5-b

---

**From:** Rebecca Ramsay <outlook\_066EDD1EAF65F2CF@outlook.com>  
**Sent:** Friday, May 15, 2020 8:07 AM  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>  
**Subject:** [EXTERNAL] PLUTONIUM PIT PRODUCTION AT SAVANNAH RIVER SITE

If the goal of stockpiling nuclear weapons is to provide greater security for the U.S., there may be safer and far less expensive ways to achieve this. For instance, what about providing quality healthcare for everyone, not just for some. What about making sure drinking water in all of our communities is actually safe to drink. How about being assured the air we are breathing, or the food we are eating has not been chemically contaminated. And, what brings about greater security to families and individuals than affordable housing. Some of us have access to public transportation, but many more do not. More funding is also needed for quality public preschool, elementary and secondary education, as well as for parks and playgrounds.

As tax payers, Americans can insist on shifting funding from nuclear weapons production and storage over to programs supporting health, prosperity, and enjoyable living conditions.

Rebecca L. Ramsay  
30 Churchill Avenue, #610  
Cambridge, MA 02140  
  
(617) 497-9035  
[rebecca.ramsay2@gmail.com](mailto:rebecca.ramsay2@gmail.com)

1/5-a

---

**From:** Calvin Milam <cmilam@postandcourier.com>  
**Sent:** Friday, May 15, 2020 10:30 AM  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>  
**Subject:** [EXTERNAL] Public comment for SRS pit production

The United States has about 900 nuclear-tipped missiles ready to go, like in 30 minutes or less, many thousands of other nukes stockpiled or retired, in addition to thousands of pits ready to be inserted into detonation devices.

Say the U.S. and Russia or China, even Pakistan, exchanged a few thermonuclear rounds, 200-300 bombs. Do you think there would be appetite for more?

It's utter madness regardless of the logic.

The track record at SRS is abominable. The nation's sincerity in building the MOX project is questionable.

If pit production does occur at SRS – and it's almost assured the work will begin and billions of dollars will be misspent – the most likely outcome will be that South Carolina is left with more surplus PU than it already has, and more waste.

Why not just skip producing 4,000 new pits and say we made them? If any older pits are beyond their usefulness (which is doubtful), they can be reprocessed. The MOX smokescreen kept Russia in check as long as could be reasonably expected.

Even if Americans paid attention to things such as this, nothing would stop the military, or the NNSA in this case, from going ahead and doing what it wants anyway. I waste my breath because it's all I have.

People of conscience shouldn't countenance building any more nuclear weapons. A few dozen is probably enough to end human life.

Lead looks enough like PU to fool most cameras. Let's not make them and say we did.

Hot flash,

Calvin Milam  
2314 High Tide Drive  
Charleston SC 29414  
(843) 329-9309

1/5-a



---

**From:** Sandra Jordan <sandraj@usca.edu>  
**Sent:** Friday, May 15, 2020 12:50 PM  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>  
**Subject:** [EXTERNAL] Comments on Proposed Plutonium Pit Production at Savannah River Site

Ms. Jennifer Nelson  
NEPA Compliance Officer  
National Nuclear Security Administration  
Savannah River Field Office, P.O. Box A  
Aiken, South Carolina 29802  
[NEPA-SRS@SRS.gov](mailto:NEPA-SRS@SRS.gov)

May 15, 2020

Dear Ms. Nelson:

Thank you for providing an opportunity to provide comments on the proposed Plutonium Pit Production at Savannah River Site. I was on the teleconferenced town hall meeting, but I could not get my speaker to work when I was called upon (sorry about that!). I am respectfully submitting the following comments for consideration in response to the Department of Energy (DOE) National Nuclear Security Administration (NNSA) preparation of its environmental impact statement (EIS) for plutonium pit production at the Savannah River Site (SRS).

Upgrading the U.S. nuclear arsenal, and ramping up the plutonium pit production mission, is one of our highest national security priorities. As a first grader in school in Washington D.C. in 1962, I experienced the Cuban Missile Crisis through the more mature perspectives of my parents and teachers. We spoke of those thirteen days many times as I grew up. No doubt, that experience shaped my belief that as a nation we have to continue a two-pronged strategy to deter the use of weapons of mass destruction. Those two (perhaps contradictory) strategies are to reduce the number of weapons around the globe, and maintain an arsenal at a level that it will serve to be a deterrence to our adversaries. Moving to our current time, it is clear that significant global tensions make this a dangerous time. Tense relations between India and Pakistan, the emergence of a small arsenal in North Korea, Iran's growing nuclear program, and the U.S. withdrawal from its treaty with Russia on intermediate-range nuclear missiles are all impacting the current situation of global security.

1/5-b

Several U.S. presidents, military leaders in all branches of the armed forces, and national agencies all agree that the U.S. can best prepare for the next nuclear age by modernizing our nuclear arsenal. Thus, I support NNSA's proposal to repurpose the Mixed Oxide Fuel Fabrication Facility (MFFF) at SRS to produce plutonium pits, restoring an imperative manufacturing capability for our nation. The EIS shows that SRS has the talent and capacity to conduct this essential nation defense mission and can do so safely, efficiently, and with a minimal environmental impact. The Site has existing nuclear processing infrastructure, a well-respected safety record, and significant land buffer zones, that make it a secure, ideal location for this project. The Savannah River Site has maintained a world-class manufacturing safety culture for decades, and can operate this new mission in compliance with all environmental laws and regulations.

It makes sense to develop the plutonium pits at two locations. Selecting SRS for this effort will meet the objective in the 2018 Nuclear Posture Review, to provide "an effective, responsive, and resilient nuclear weapons infrastructure" for the enduring capability and capacity for both SRS and Los Alamos National Laboratory to produce no fewer than 80 plutonium pits per year by 2030.

I am honored to support the consideration and selection of SRS for the plutonium pit production mission, and commend DOE and SRS for your continued focus on safety and environmental stewardship in South Carolina in service to our nation by contributing to the modernization of our national arsenal.

Thank you for the opportunity to provide these comments and again I apologize for the technology issues that prevented my ability to participate in the video conferenced town hall.

Sandra Jordan  
Chancellor  
University of South Carolina Aiken



1/5-b  
(Cont'd)





[www.ananuclear.org](http://www.ananuclear.org)

A national network of organizations working to address issues of nuclear weapons production and waste cleanup.

Mr. Dan Brouillette, Secretary  
United States Department of Energy  
1000 Independence Ave., SW  
Washington, D.C. 20585  
[The\\_Secretary@hq.doe.gov](mailto:The_Secretary@hq.doe.gov)

Ms. Lisa Gordon-Hagerty, Administrator  
National Nuclear Security Administration  
1000 Independence Ave., SW  
Washington, D.C. 20585  
[Lisa.Gordon-Hagerty@nnsa.doe.gov](mailto:Lisa.Gordon-Hagerty@nnsa.doe.gov)

Mr. Bruce Diamond, General Counsel  
National Nuclear Security Administration  
1000 Independence Ave., SW  
Washington, D.C. 20585  
[Bruce.Diamond@nnsa.doe.gov](mailto:Bruce.Diamond@nnsa.doe.gov)

Mr. Brian Costner, Director  
Office of NEPA Policy and Compliance  
U S Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585  
[Brian.Costner@hq.doe.gov](mailto:Brian.Costner@hq.doe.gov)

April 21, 2020

*Request for Indefinite Extension of Comment Periods  
for the duration of the COVID-19 national emergency  
for all DOE and NNSA NEPA processes, including Environmental Impact Statements, Environmental  
Assessments, and Supplement Analyses.*

Dear Secretary Brouillette, Administrator Gordon-Hagerty, Mr. Costner, and Mr. Diamond:

We live in unprecedented times. On March 13, 2020, President Donald J. Trump declared a state of national emergency in response to the COVID-19 outbreak. Since that time, subsequent declarations of emergency have been declared by the federal government for every state in the United States. In many states, Governors have issued "shelter in place" or "safer at home" mandates; cities and counties likewise have issued orders constraining travel and the conduct of business. The number of people currently unemployed is unprecedented; school systems across the country have transitioned to remote learning; people are struggling to pay bills, supervise children, protect

themselves against unprecedented threats, negotiate a dangerous and uncertain future, and deal with shortages of food and paper goods.

These circumstances require significant and often dramatic adjustments by people across the country. The disruptions, along with the persistent and ever-present threat of infection by an unseen virus, had made it impossible for life to go on as usual.

We appeal to you to recognize this and to provide immediate relief to the public. The decisions being made by DOE and NNSA in a variety of NEPA studies have the potential to significantly impact our lives and our communities. It is not reasonable to expect the public to be able to deal with environmental analyses or to provide extensive and thorough public comments on them. It is equally unreasonable to ask us to forfeit our chance to participate meaningfully in a NEPA process because of the extraordinary demands being placed on us by the COVID-19 threat and the civil constraints it has imposed upon us. A declaration of national emergency may be words on a page in a bureaucracy, but where we live, the emergency is real, and it is a complete and fearful disruption of our lives.

On April 8, 2020, U.S. Senators Maria Cantwell and Tom Udall, along with 20 other members of the Senate, sent a letter (see attached) to Mr. Russell T. Vought, Acting Director of the Office of Management and Budget, who was appointed to consider all administrative proposals in the President's declaration, urging him to "instruct all federal agencies to indefinitely extend all open or announced upcoming public comment periods for rulemakings and administrative actions not related to the COVID-19 pandemic response."

We agree with the Senators that:

"the American public is not only legally entitled to a meaningful opportunity to participate in these important proceedings; their participation is crucial to ensuring that agencies' work is carried out effectively. The public is an invaluable source of expertise for agency decision-makers, and their ability to weigh in on agency decisions advances the good government goals of accountability. Yet, such meaningful participation is an impossibility for tens of millions of Americans during this pandemic emergency period. We cannot reasonably expect the public to redirect attention from protecting themselves and families to comment on federal agency rules and proceedings that while important, are not related to the crisis at hand or its response."

The Senators' letter was preceded by an April 1 letter from the chairpersons of fourteen committees of the House of Representatives urging the Administration to "immediately reschedule all public hearings and extend public comment periods...by at least 45 days beyond the end of the declared national emergency."

In consideration of the extraordinary challenges facing all of us in this time, we are asking you to hit the pause button and to provide an indefinite extension of the comment periods for any and all NEPA processes currently underway in the Department of Energy or the National Nuclear Security Administration.

As you know, the organizations in the Alliance for Nuclear Accountability are among the most active public voices in virtually any NEPA process conducted by the NNSA and many conducted by DOE. Members of our organizations are among those most directly affected by the Department's NEPA decisions. We believe the NEPA process is designed to inform the public and to provide for meaningful public participation. We are a regular conduit of information to the broader public about DOE and NNSA NEPA activities, and we routinely encourage public participation; urging people to

1/4-a.1

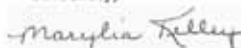
submit comments and attend hearings. Constraints on our work inhibit our ability to do that. The challenges facing us and our nation in this time of national emergency due to the ongoing threat of COVID-19 are more emergent than the ongoing processes of the DOE and NNSA—yet those processes are enormously important to our communities.

It is inconceivable that the DOE or NNSA can believe continuing with time-limited comment periods or virtual public meetings conform to the spirit of public participation envisioned in NEPA or its implementing regulations. It is unconscionable for DOE or NNSA to proceed as though “business as usual” is appropriate when the President of the United States has declared a national emergency.

As you know, several NEPA processes are in the midst of comment periods right now and deadlines are looming, so we put this request forward with a sense of urgency. We are asking you to do the right thing; to make a decision, and to announce your decision within seven days.

We look forward to hearing from you.

Sincerely,



Marylia Kelley, President  
Board of Directors  
Alliance for Nuclear Accountability

cc: Mr. Russell Vought, Acting Director  
Office of Management and Budget  
725 17<sup>th</sup> Street, NW  
Washington, DC 20503

Senator Maria Cantwell  
United States Senate  
Washington, DC 20510

Senator Tom Udall  
United States Senate  
Washington, DC 20510

Representative Adam Smith  
Chairman, Committee on Armed Services  
U S House of Representatives  
Washington, DC 20515

Representative Mac Thornberry  
Ranking Member, Committee on Armed Services  
U S House of Representatives  
Washington, DC 20515

Representative Marcy Kaptur  
Chair, Appropriations Subcommittee on Energy and Water Development  
U S House of Representatives

2/4-a

Washington, DC 20515

Representative Mike Simpson  
Ranking Member, Appropriations Subcommittee on Energy and Water Development  
U S House of Representatives  
Washington, DC 20515

Senator Lamar Alexander  
Chair, Appropriations Subcommittee on Energy and Water Development  
United States Senate  
Washington, DC 20510

Senator Dianne Feinstein  
Ranking member, Appropriations Subcommittee on Energy and Water Development  
United States Senate  
Washington, DC 20510

Senator Jim Inhofe  
Chair, Armed Services Committee  
United States Senate  
Washington, DC 20510

Senator Jack Reed  
Ranking member, Armed Services Committee  
United States Senate  
Washington, DC 20510

---

**From:** Brittany Burnett <bburnett@uwcsra.org>  
**Sent:** Monday, May 18, 2020 4:37 PM  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>  
**Subject:** [EXTERNAL] Comments from United Way of the CSRA

Good evening  
I wasn't able to stay on for the entire call a couple weeks ago, but wanted to be sure that you received comments from United Way of the CSRA.  
SRNS is a huge community supporter, and we know that this type of mission will continue to have an economic impact on our community.  
We know that SRNS is an upstanding partner who continues to have a focus on safety for employees, integrity in their mission, and betterment in the communities in which they serve.  
We are proud supporters of this mission and please let us know if we can provide any other comments that are helpful to make this vision come to fruition.  
Thank you--

1/5-b

**Brittany W. Burnett**  
President & CEO

Direct 703-622-8922  
Cell 678-642-0325  
bburnett@uwcsra.org  
www.uwcsra.org

**United Way**  
United Way of the CSRA

SUPPORT THE CSRA COVID-19 EMERGENCY RESPONSE FUND

CLICK HERE TO DONATE

United Way  
Community FOUNDATION  
Air Way Corridor Partnership River Area

-----Original Message-----

From: mcarmalt@everyactioncustom.com <mcarmalt@everyactioncustom.com>

Sent: Tuesday, May 26, 2020 6:04 PM

To: NEPA-SRS <NEPA-SRS@srs.gov>

Subject: [EXTERNAL] Draft SRS Pit Production EIS Comment

Dear NNSA Savannah River Site Office,

I strongly oppose the plan to produce new plutonium pits for nuclear weapons. The United States has more nuclear weapons than it needs for our security. Producing large numbers of new plutonium pits will cost tens of billions of dollars at a time when those resources could be devoted to more pressing needs like addressing the COVID-19 crisis.

Moreover, the US history of producing plutonium pits is literally littered with enduring environmental damage and human health costs, while science shows that existing plutonium pits will last at least 100 years given appropriate care.

I call on the United States to publicly renounce the production of new nuclear weapons, to abandon this plan to make new plutonium pits, and to instead pursue a path with adversaries and allies alike that will reduce and ultimately eliminate the nuclear threat, leading to the achievement of true human security.

Sincerely,

Margaret Carmalt

5303 Hamilton Wolfe Rd Apt 905 San Antonio, TX 78229-4364 mcarmalt@gmail.com

1/5-a

-----Original Message-----

From: info@scchamber.net <info@scchamber.net> On Behalf Of South Carolina Chamber of Commerce  
Sent: Wednesday, May 20, 2020 9:38 AM  
To: NEPA-SRS <NEPA-SRS@srs.gov>  
Subject: [EXTERNAL] Form submission from: Plutonium Pit Production Comments

Submitted on Wednesday, May 20, 2020 - 09:38 Submitted by anonymous user: 216.79.77.132 Submitted values are:

Name: Brian Hartley

Company Name: Cadence Bank

Job Title: Commercial Lender

Mailing Address: 2201 Terrace Road

Phone Number: 7062028000

Email Address: brian.hartley@cadencebank.com Use suggested comments? No

Your Comments: Brian Hartley believes that Savannah River Site is the right location for this Pit Production mission will compliment other projects at the site. Savannah River Site has over 70 years of experience safely managing nuclear materials and is more than capable of handling important new national security missions. The many employees who work at SRS are our neighbors, actually over 1400 employees live in Columbia, and we believe SRS employees are experts in this industry. By creating new jobs and maintaining current jobs at the site, this will keep our region growing and thriving. The economic impact of the site is tremendous for our two-state, multiple-county region.

1/5-b

The results of this submission may be viewed at:

<https://www.scchamber.net/node/1572/submission/6451>



**Michelle Lujan Grisham**  
Governor

**Howie C. Morales**  
Lt. Governor

**NEW MEXICO  
ENVIRONMENT DEPARTMENT**

Harold Runnels Building  
1190 Saint Francis Drive, PO Box 5469  
Santa Fe, NM 87502-5469  
Telephone (505) 827-2855  
[www.env.nm.gov](http://www.env.nm.gov)



**James C. Kenney**  
Cabinet Secretary

**Jennifer J. Pruett**  
Deputy Secretary

May 18, 2020

Jennifer Nelson  
NEPA Compliance Officer  
National Nuclear Security Administration  
Savannah River Field Office  
P.O. Box A  
Aiken, SC 29802

Submitted electronically to: [NEPA-SRS@srs.gov](mailto:NEPA-SRS@srs.gov)

RE: Savannah River Site, Draft Environmental Impact Statement for Plutonium Pit Production

Dear Ms. Nelson,

On behalf of the New Mexico Environment Department (NMED), attached please find our comments on the April 2020 Savannah River Site (SRS) Draft Environmental Impact Statement for Plutonium Pit Production. NMED's comments are attached.

Please do not hesitate to contact me to discuss further.

Sincerely,

James C. Kenney  
Cabinet Secretary

Attachment (1)

cc: Courtney Kerster, Director of Federal Affairs, Office of Governor Michelle Lujan Grisham  
Sarah Cottrell Propst, Secretary, New Mexico Energy, Minerals and Natural Resources Department  
Mike Sandoval, Secretary, New Mexico Department of Transportation  
Rebecca Roose, Director, NMED Water Protection Division  
Stephane Stringer, Director, NMED Resource Protection Division



NEW MEXICO ENVIRONMENT DEPARTMENT  
SAVANNAH RIVER SITE, DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR PLUTONIUM PIT PRODUCTION COMMENTS  
MAY 18, 2020

---

### Attachment

#### **Introduction**

To meet national security requirements, the National Nuclear Security Administration (NNSA) is pursuing a two-prong approach to the production of plutonium pits—produce a minimum of 50 pits per year at the Savannah River Site (SRS) near Aiken, South Carolina and a minimum of 30 pits per year at Los Alamos National Laboratory (LANL) in New Mexico.

The NNSA prepared an Environmental Impact Statement (EIS) to evaluate the potential environmental impacts of producing a minimum of 50 pits per year at SRS. The NNSA's Proposed Action is to repurpose the Mixed Oxide Fuel Fabrication Facility (MFFF) at the SRS to produce a minimum of 50 war reserve pits per year and to develop the ability to implement a short-term surge capacity to enable NNSA to meet the requirements of producing pits at a rate of not less than 80 war reserve pits per year beginning during 2030 for the nuclear weapons stockpile. The Proposed Action also includes activities across the Nuclear Weapons Complex associated with transportation, waste management, and ancillary support (e.g., staging and testing) for the pit production mission at SRS. Apart from this EIS, the NNSA also has prepared a separate analysis of increasing production activities at LANL.

#### **Comments**

- 1. Department of Energy (DOE) and National Nuclear Security Administration (NNSA) did not disclose, discuss and/or quantify various environmental legal matters that could have a material impact on its Proposed Action.**

Under the Proposed Action, NNSA states that "...a significant quantities of TRU [transuranic] waste could be generated at SRS and shipped to WIPP [Waste Isolation Pilot Plant] for disposal. It is estimated that approximately 31,350 cubic meters of TRU waste could be generated over the life of the project (i.e., 50 years) at SRS, assuming a production rate of 50 pits per year. In addition, approximately 5,350 cubic meters of TRU waste could be generated over the life of the project (i.e., 50 years) at LANL [Los Alamos National Laboratory], assuming a production rate of 30 pits per year. The available capacity of WIPP would accommodate the conservatively estimated TRU waste that could be generated over the next 50 years." NNSA further explained that the Proposed Action would represent an increase of 14 to 21 percent in shipments to the WIPP from SRS over current planning.

The DOE submitted a request to modify the NMED WIPP Hazardous Waste Facility Permit to differentiate between the way waste volumes was defined versus the way the WIPP Land Withdrawal Act (LWA) waste volume (175,564 cubic meters) was calculated and tracked. In December 2018, the NMED approved the DOE's request to modify the existing WIPP Hazardous Waste Facility Permit and in January of 2019 the DOE fully implemented the change in the method of tracking, reporting, and recording the volumes of generated waste. The DOE used this approved Volume of Record method to calculate the estimated shipments and emplacement in WIPP from SRS in the Draft Environmental Impact Statement for Plutonium Pit Production at the Savannah River Site in South Carolina (EIS). It is important to note that also in January 2019 this modification to the WIPP Permit was appealed. There has been no action on this appeal by the courts. Should the approval of the permit modification be overturned by the courts, the volume of waste shipped from SRS for emplacement at the WIPP would constitute a greater percentage of the LWA volume. The DOE and NNSA must make available the volumetric contribution of all defense waste and environmental legacy waste estimated for the WIPP for SRS and all other DOE and NNSA sites around the U.S. which plan to utilize the WIPP. The DOE and NNSA must update this information on a periodic basis (i.e., quarterly).

1/6-j.3

NEW MEXICO ENVIRONMENT DEPARTMENT  
SAVANNAH RIVER SITE, DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR PLUTONIUM PIT PRODUCTION COMMENTS  
MAY 18, 2020

Additionally, the April 2020 draft EIS does not discuss the November 2019 settlement between the DOE and the State of Idaho related to Idaho National Laboratories and the associated impacts of how the DOE prioritizes shipments and emplacement at WIPP. The total volume of emplaced and future waste shipments is expected to exceed the legislated volume capacity for WIPP (National Academy of Sciences Review of Department of Energy's Plans for Disposal of Surplus Plutonium in the Waste Isolation Pilot Plant, April 2020). The Idaho Settlement allocates fifty-five percent (55%) of all TRU waste shipments received at WIPP for Idaho. Depending on how the DOE prioritizes future waste shipments across the complex, other facilities around the U.S., including LANL, will need to store remediated legacy waste and/or delay remediating legacy waste. The State of New Mexico objects to the DOE prioritizing defense waste over remediating and emplacing legacy contamination at the WIPP, particularly in the state that hosts and regulates the WIPP.

2/6-j.4

The DOE and NNSA failed to disclose, discuss and/or quantify various environmental legal matters that will have a material impact on legacy contamination and risk to communities.

**2. DOE and NNSA failed to contemplate the successful emplacement of TRU waste at the WIPP due to limitations of New Mexico transportation infrastructure (i.e., highways and roads).**

At pit production rates of 50 to 80 pits per year, the SRS shipments of TRU waste to the WIPP are expected to be about 106 to 156 annually. The additional waste shipments represent increases of 14 to 21 percent over current planning.

The shipments of waste from SRS travel across New Mexico's designated WIPP highways. Due to the significant industrialization in Southeast New Mexico, there is a significant increase in traffic and degradation of road conditions. Further, there has been a significant increase in motor vehicle crashes along designated WIPP highways. The severity of such motor vehicle crashes has also increased due to the volume of large trucks using these roadways. The greatest concentration of crashes involving heavy duty trucks is along WIPP designated routes due to road conditions.

The DOE and NNSA acknowledge that a major investment in facility maintenance and infrastructure repair recapitalization and modernization is necessary to prevent costly failures and to continue to safely perform mission requirements. Just as the WIPP facility has exceeded its design life and needs regular upgrades and maintenance (DOE *Carlsbad Field Office Strategic Plan 2019-2024*, August 2019), the roads in New Mexico also need regular upgrades and maintenance to ensure safe transport of shipments to WIPP and prevent catastrophic consequences to human health and the environment.

3/6-m.1

To mitigate risk, the DOE and NNSA must reinstate funding to the State of New Mexico as authorized in Section 15 of the LWA and provide an annual appropriation of \$31.5 million in federal fiscal year 2021 and subsequently indexed for inflation for the remaining useful life of the WIPP. This LWA funding is a necessary infrastructure investment to minimize risk of radiological and hazardous waste releases that could impact public health and safety of New Mexicans, as well as the environment.

Further, the Resource Conservation and Recovery Act (RCRA) and New Mexico's Hazardous Waste Act (HWA) gives NMED the authority to control hazardous waste from the "cradle-to-grave." This includes the generation, *transportation*, treatment, storage, and disposal of hazardous waste [emphasis added]. As DOE states in the draft EIS, the Federal Facility Compliance Act of 1992 waives sovereign immunity for federal facilities under RCRA and requires DOE to conduct an inventory and develop a treatment plan for mixed wastes. The WIPP is a permitted by NMED pursuant to federal and state law for the management of mixed wastes.

The DOE and NNSA failed to quantify the risk, impacts, and costs associated with the successful

NEW MEXICO ENVIRONMENT DEPARTMENT  
SAVANNAH RIVER SITE, DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR PLUTONIUM PIT PRODUCTION COMMENTS  
MAY 18, 2020

emplacement of SRS wastes at the WIPP in the draft EIS. Prior to implementing the Proposed Action and increasing shipments on New Mexico on designated WIPP highways, the State of New Mexico requests the DOE and NNSA conduct such an analysis and share the results with the Governor of New Mexico, Secretary of the New Mexico Department of Transportation, the Secretary of the Energy, Minerals and Natural Resources Department, and the Secretary of the NMED.

3/6-m.1  
(Cont'd)

**3. New Mexico water sources and water supply systems must be protected from accidental releases of radioactive materials that may occur along transportation routes in the state.**

According to Figure 4-4 in the draft EIS, TRU waste materials would be shipped along U.S. Highway 285, state highways, and local roads to the WIPP in southeastern New Mexico. Additionally, plutonium, beryllium, and low-level radioactive wastes could potentially be transported between South Carolina and LANL, Nevada National Security Site, and/or a commercial facility in Utah along Interstates 25 and 40, U.S. Highway 285, and several state highways and local roads. In New Mexico, there are 156 regulated public surface or groundwater systems (PWS) located within one mile of these transportation corridors.

4/6-m.2

If the Proposed Action is implemented, it is critical that the packaging and transport regulations and emergency response protocols described in Section 3.12 of the draft EIS are followed to the greatest extent possible in order to protect water sources and water supply systems from accidental releases of radioactive materials.

**4. Given the disproportionate burden of public health and environmental risks that the State of New Mexico bears related to nuclear energy and weapons programs, every aspect of the Proposed Action must provide the highest level of protection to New Mexico citizens, including use of best available technology in these safeguards.**

Uranium mining and milling, legacy contamination at national laboratories, disposal of defense waste at WIPP, and the proposed indefinite storage of commercial spent nuclear fuel has long created risks to public health and the environment in the State of New Mexico that are disproportionately greater than such risks to the general population of the United States. This most recent Proposed Action, for example, includes transport of plutonium metal from Los Alamos National Laboratory to the SRS, and the transport of plutonium pit waste from SRS back to New Mexico for disposal at the WIPP.

New Mexico contains significantly greater percentages of Hispanic or Latino and American Indian residents, as well as people living in poverty, than in the United States general population (see Table 1: New Mexico Demographics Data, <https://www.census.gov/quickfacts/fact/table/US/PST045219>).

5/6-i.1

**Table 1: New Mexico Demographics Data**

Demographic	United States	New Mexico
Hispanic or Latino	18.3%	49.1%
American Indian	1.3%	10.9%
Persons in poverty	11.8%	19.5%

Executive Order 12898, Federal Actions to Address Environmental Justice in Minority and Low-Income Populations, states, "... each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority

NEW MEXICO ENVIRONMENT DEPARTMENT  
SAVANNAH RIVER SITE, DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR PLUTONIUM PIT PRODUCTION COMMENTS  
MAY 18, 2020

---

populations and low-income populations of the United States.”

The draft EIS fails to demonstrate that the Proposed Action will achieve environmental justice for the high percentage of minority and low-income populations in the State of New Mexico that have already suffered disproportionately high adverse human health and environmental effects of U.S. Department of Energy programs. Environmental justice deficiencies in the draft EIS include:

- a. Failure to identify and discuss vulnerable populations in New Mexico;
- b. Failure to identify and evaluate the cumulative history of adverse human health and environmental effects on New Mexico’s vulnerable populations;
- c. Failure to evaluate release scenarios from the Proposed Action, such as transportation accidents, that might adversely affect vulnerable populations in New Mexico; and
- d. Repeated, yet unsubstantiated, assertions that cumulative environmental impacts from the Proposed Action would be either not notable or not expected.

The environmental justice deficiencies in the draft EIS must be corrected by preparation of a proper risk assessment that evaluates all potential release scenarios and that quantifies incident-specific and cumulative impacts to vulnerable populations in New Mexico. In accordance with Executive Order 12898, every aspect of the Proposed Action must provide the highest level of protection to New Mexico citizens, including use of best available technology in these safeguards.

**5. Disposal of plutonium pit waste at the WIPP must be done in compliance with existing laws, permits, settlements and acceptance criteria.**

The disposal of SRS TRU waste at the WIPP site must conform to the following requirements:

- a. Future waste streams must meet requirements in the DOE WIPP Waste Acceptance Criteria, the WIPP Hazardous Waste Facility Permit Waste Analysis Plan, and the WIPP Transportation Safety Plan Implementation Guide;
- b. DOE must adhere to the limits on types and quantity of waste imposed by the 1992 WIPP Land Withdrawal Act, as amended by Public Law No. 104–201 (1996); and
- c. Legacy waste, particularly from LANL, must remain a high priority for disposal at the WIPP.

5/6-i.1  
(Cont’d)

6/6-j.5  
(Cont’d)

### Draft SRS Pit Production EIS Comment

My name is Pete LaBerge. For the past 12 years, I have lived in Windsor, SC, approximately 3 miles from the SRS property line near SC Hwy. 278. I have reviewed the Summary Draft EIS for Plutonium Pit Production at the Savannah River Site and I am commenting as a Concerned Citizen. These remarks include and expand upon comments I gave in person on June 27, 2019 at the Public Scoping Meeting in N. Augusta, SC.

I will address:

- Necessity of Pit Production
- Historical Pit Production Concerns
- Specific MOX Facility Adaptation Concerns
- Historical Environmental Issues at SRS

1.) As stated in the public scoping, studies have shown current Pit viability to be a minimum of 100 years and possibly up to 150 years. The EIS Summary alludes to potential Pit degradation, immediately followed by saying that more research is required to confirm this. Current stockpiles are 30-40 years old, well within known viability ranges. Not mentioned in the EIS is the likelihood of worldwide nuclear proliferation caused by newly designed bombs that use the new Pits. Underground testing would likely be required, thus violating the Threshold Test Ban Treaty.

1/1-c  
2/2-c  
3/2-d

2.) The EIS Summary notes that current Pit stockpile inventory was produced from 1978-1989. Nowhere in the Summary is it noted that Pit Production was stopped at Rocky Flats in 1989, due to an FBI closure action resulting from violation of numerous environmental laws. It was stated that DOE, "decided not to resume production." This statement is disingenuous at best. In the proposal to convert the failed MOX facility into a Plutonium Bomb Plant, I don't see adequate lessons learned from the Rocky Flats Plutonium Pits environmental disasters.

4/2-i

3.) There is no substantive discussion in the Summary EIS about design feasibility of converting the MOX building to Pit Production. The MOX Project was, at minimum, a failed \$8 Billion DOE/NNSA boondoggle, where nobody has yet been held accountable. It was plagued by countless design changes, cost overruns and lack of transparency. Why would anyone believe that the SRS Pit Production Proposal will be any different?

5/3-j

4.) Historical major contamination incidents at SRS cannot be ignored. Radiation release incidents in 1965 and 1970, resulted in melted fuel rods and radiation releases in K Reactor. Many workers were exposed to radiation, which would eventually prove to be deadly. Congress established an independent advisory board in 1988 amid congressional hearings, which revealed that, "Safety took a backseat to production at SRS."

6/6-k.1

Environmental concerns at SRS are not just historical issues. Local newspaper headlines bear this out:

- Nuclear Contaminate Found in Savannah River Tributary, Aiken Standard, 8-3-16.
- Radiation Contaminated Water Discovered at SRS, Aiken Standard, 1-12-19.

As I share the same aquifer with SRS, I find these reports quite disturbing.

For all the reasons listed above, I urge that proposal 8.2.2: No Action Alternative, be adopted.

Respectfully Submitted,

Pete LaBerge

Windsor, SC.

7/5-a



May 18, 2020

Ms. Jennifer Nelson  
NEPA Document Manager  
National Security Administration  
Savannah River Field Office  
P.O. Box A  
Aiken, South Carolina 29802

RE: Draft Environmental Impact Statement (EIS) for Plutonium Pit Production at the Savannah River Site in South Carolina

Dear Ms. Nelson:

Our organization – the Savannah River Site Community Reuse Organization (SRSCRO) – is the U. S. Department of Energy’s designated Community Reuse Organization for the Savannah River Site and is governed by a 22-member Board of Directors composed of business, government and academic leaders from Georgia and South Carolina. The SRSCRO is a 501(c) (3) private non-profit organization charged with developing and implementing a comprehensive strategy to diversify the economy of a designated five-county region of Georgia and South Carolina. SRSCRO counties include Aiken, Allendale and Barnwell in South Carolina and Richmond (Augusta) and Columbia counties in Georgia. The SRSCRO is focused on new missions at SRS and ensuring the site maintains its role as part of this nation’s national security structure.

First, we welcome the opportunity for the Savannah River Site (SRS) to be considered for the Plutonium Pit Production mission. We are comfortable saying SRS has the capability to perform this mission and we are always open to increasing enduring missions at SRS. In addition, SRS has been operating safely in our community for 70 years. SRS has the benefit of ample space to retrofit and expand existing facilities for the project.

SRS is well suited to support the Plutonium Pit Production mission in many important areas, including:

1. A supportive and welcoming host community.
2. A strong record of worker and public safety and environmental protection, which consistently places SRS as a leader among Department of Energy (DOE) sites. Safety and environmental protection are core values at SRS and provide an important basis for surety of programmatic operations.

P. O. Box 696, Aiken, South Carolina 29802 P: 803.508.7401 F: 803.593.4296 [www.srscro.org](http://www.srscro.org)  
Serving the Counties of Aiken SC, Allendale SC, Barnwell SC, Columbia GA, and Richmond GA

1/5-b



3. A skilled workforce with hands-on experience in large-scale plutonium operations.
4. A superb national laboratory, which has core competency in actinide chemistry. The Savannah River National Laboratory (SRNL) also has a long history of directly supporting plutonium operations, a key advantage as new facilities or processes come on-line.
5. The SRS security posture is excellent. No security violations. Its large land mass provides significant standoff zones.
6. A successful history of working with the design laboratories in tritium research and development activities. This same model can be used as the new Plutonium Pit Production mission becomes responsible for specific plutonium R&D and surveillance activities.
7. A customer-oriented outlook, which has resulted in a flawless record of on-time product delivery to the weapons complex and the active stockpile.

The community vision for SRS includes continued and long-term DOE programs as part of our diverse regional economic base. Our citizens are proud of our past contributions to the nation's national security, and we want to continue to play a major role in meeting its security and defense needs.

We fully support National Nuclear Security Administration's (NNSA) intent to move forward with a Final EIS for the Savannah River Plutonium Processing Facility (SRPPF) and if warranted, issue a record of decision (ROD). We realize the pit production mission will require the shipment of plutonium to SRS but believe as noted above, SRS has the capability to perform this mission.

We were pleased to see an economic and social impact analysis was conducted in the Draft EIS. It is important for the local community to know that direct employment (number of personnel in peak year) would be 1,800 (construction) and 1,110 (Operation and Security) to repurpose the Mixed Oxide Fuel Fabrication Facility (MFFF) into the SRPPF to produce a minimum of 50 pits per year and to know that the cumulative impacts on the availability of housing and community services are expected to be small in the region of influence (ROI).

According to the Draft EIS, no adverse impacts on the availability of housing and community services under the Proposed Action are expected. The cumulative employment at SRS from past, present, and reasonably foreseeable future actions could reach a peak of about 15,275 personnel. It was also noted that payroll and materials expenditures would have a positive impact on the local economics.



The Draft EIS helped to identify the necessary manufacturing operations required for this mission which included casting, machining, and assembly. Another important aspect is the need for analytical chemistry capabilities. The analytical chemistry of SRPPF requires rigorous quality controls, including National Institute of Standards and Technology traceability for key analytes, which is one of the core competencies of the SRNL.

1/5-b  
(Cont'd)

The Draft EIS noted Beryllium may be a component in both pit disassembly and assembly operations. This is important because beryllium dust and particles can cause adverse health effects. Since all work would be performed in gloveboxes, according to the EIS no operations are expected to cause beryllium to become airborne.

Finally, we would like to offer these additional comments as it relates to the Plutonium Pit Production mission.

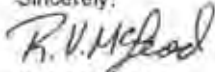
- Site-specific documentation is required to compare the availability of housing and community services between Los Alamos National Laboratory (LANL) and SRS. This information would help concur with the resiliency, flexibility and redundancy of NNSA's two-pronged approach.
- Besides identifying manufacturing operations components of the pit production mission, both communities need more specific information on the skill mix of the anticipated workforce and the numbers associated with each skill. It is extremely important to not only have the availability of the future workforce in our local communities but that these workers have the right skills to meet the planned mission. The local community will play a major role in the facilitation of the instruction and training of the local citizens. Access to this information is imperative and is needed now to meet the schedule identified in the Draft EIS.

2/6-h.1

3/6-h.2

Thank you for the opportunity to voice our concerns.

Sincerely,



Rick McLeod

President/CEO, SRSCRO

---

**From:** jatc150 <jatc150@bellsouth.net>  
**Sent:** Wednesday, May 20, 2020 9:31 AM  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>; Moses Todd <iloveaug93@gmail.com>; Bill Wright <bwright150@bellsouth.net>  
**Subject:** [EXTERNAL] Re-purpose MOX

I am in favor to re-purpose the MOX Facility at SRS to the Pit Plutonium Facility at SRS.

Thanks,

Jeffery G. Rice

Training Coordinator

Local Union 150

(706) 722-7704

(706) 724-7123

1/5-b

**From:** moses todd <iloveaug93@gmail.com>  
**Sent:** Wednesday, May 20, 2020 9:05 AM  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>  
**Subject:** [EXTERNAL] Repurpose MOX FFF to PIT project

I support repurpose MOX - FFF to the Pit project at SRS!

Moses Todd  
2115 Noland connector  
Augusta Georgia 30909

1/5-b

19 May 2020

Ms. Jennifer Nelson, NEPA Document Manager  
National Nuclear Security Administration, Savannah River Field Office  
P.O. Box A  
Aiken, SC 29802  
Email: [NEPA-SRS@srs.gov](mailto:NEPA-SRS@srs.gov)

**Re: "Draft EIS for Plutonium Pit Production at the SRS in South Carolina"**

**Comments on National Nuclear Security Administration's Draft Environmental Impact Statement for Plutonium Pit Production at the Savannah River Site in South Carolina, DOE/EIS-0541**



**Frank N. von Hippel**, Senior Research Physicist and  
Professor of Public and International Affairs emeritus  
Program on Science and Global Security  
Princeton University, Princeton, NJ 08544<sup>1</sup>  
[fvhippel@princeton.edu](mailto:fvhippel@princeton.edu)

Draft EIS is posted here on NNSA's website:

<https://www.energy.gov/nepa/downloads/doeeis-0541-draft-environmental-impact-statement>

### Summary

Irrespective of its other merits or demerits, the *Draft EIS* does not provide a rationale for urgently building pit-production capacity at the Savannah River Site (SRS) in parallel to establishing a pit-production capacity at the Los Alamos National Laboratory (LANL).

Technically, my comments would support the "no-action" alternative but they are really an argument for deferring the decision on an SRS pit-production facility for a decade.

A decade delay would:

1. Make it possible to see whether the production line at LANL – presumably the model for the production line at SRS – works or needs to be redesigned.
2. Provide an opportunity for pit experts at LANL and Livermore National Laboratory (LLNL), peer-reviewed by the JASON group, to determine a new lower bound on the functional life of the remarkably durable pits in the current stockpile.
3. Make it possible to settle the national policy debate over scrapping US intercontinental ballistic missiles (ICBMs), which would make it unnecessary to replace the W78 ICBM warhead.

1/1-d

2/1-e  
3/1-c

<sup>1</sup> Affiliation for identification only.

Frank N. von Hippel, Comments on Draft DOE/EIS-0541, 19 May 2020

4. Provide time for a decision on whether to replace the W76 and W88 submarine-launched ballistic missile (SLBM) warheads and, if so, determine whether the new warheads could be made with refurbished stored pits or require the manufacture of new pits.
5. Allow a broader-scope and deeper review in a Programmatic Environmental Impact Statement of the tradeoffs associated with pit production and reuse before finalizing the site-specific NEPA documents.

2/1-e  
3/1-c  
(Cont'd)

4/4-f

The discussion below therefore explains the following assertions:

1. *The pit production facility at Los Alamos National Laboratory (LANL) would, in effect, serve as a pilot plant for the proposed pit-production facility at the Savannah River Site. The LANL design must therefore be shown to work to establish confidence in the scaled-up version proposed for SRS.*
2. *The JASON 2019 review of pit longevity found that NNSA has not adequately sustained the research program that a 2007 JASON review report concluded had established that most of the pits in the existing US warhead stockpile could be expected to be functional for at least a century, i.e. for at least another 50 years. NNSA recently committed to resource that program more adequately so that it can be determined if the pits are likely to continue to be functional for significantly longer than a century.*
3. *The need to manufacture more pits of existing or new types has not been settled.*
4. *A Programmatic EIS is required.*

2/1-e  
(Cont'd)

3/1-c  
(Cont'd)

5/1-b

4/4-f  
(Cont'd)

### 1. The LANL Pit Production Facility is a Pilot for the SRS Facility

The pits in the current US nuclear stockpile were almost all produced at the Rocky Flats Plant in Colorado, which operated from 1952 till 1989 and, in its later decades, produced about 1,000 pits per year.<sup>2</sup> That plant was shut down permanently in 1992 because of its releases of hazardous materials into the environment.<sup>3</sup>

In 1993, DOE asked LANL to establish a pit manufacturing capability at its PF-4 plutonium facility and, in 1996, tasked it to produce 31 “war reserve” W88 pits to fill an order that had not been completed because of the shutdown of Rocky Flats. It took the PF-4 facility 16 years, until 2012, to fabricate the pits: eleven in 2007, and a declining number annually thereafter.<sup>4</sup>

2/1-e  
(Cont'd)

The plan was to transition to the production of W87 pits for the US Minuteman III intercontinental ballistic missile but pit production was shut down by safety problems in 2013.<sup>5</sup> Pit production at PF-4 is still shut down and NNSA’s budget submission for fiscal year 2021 states that it is engaged in

<sup>2</sup> NNSA, “Plutonium Pit Production,” April 2019, <https://www.energy.gov/sites/prod/files/2019/05/f62/2019-05-13-FACTSHEET-plutonium-pits.pdf>.

<sup>3</sup> Dana Coffield, “Judge Upholds Plea-Bargain on Rocky Flats; Rockwell To Pay \$18.5 Million Fine” (Associated Press, 1 June 1992) <https://apnews.com/7b90ebbb526dc79de86f4123a6b1fa979>.

<sup>4</sup> Bradford G. Storey, *Pit Manufacturing Fiscal Year 2012 Program Report to the University of California* (LANL, 2012) Table 1, [https://www.lanl.gov/M0P2/LA-UR-12-25400\\_Pit\\_manuf\\_rpt\\_UC\\_FY2012.pdf](https://www.lanl.gov/M0P2/LA-UR-12-25400_Pit_manuf_rpt_UC_FY2012.pdf).

<sup>5</sup> R. Jeffrey Smith and Patrick Malone, “Safety problems at a Los Alamos laboratory delay U.S. nuclear warhead testing and production,” *Science*, 30 June 2017, <https://www.sciencemag.org/news/2017/06/safety-problems-los-alamos-laboratory-delay-us-nuclear-warhead-testing-and-production>.



Frank N. von Hippel, Comments on Draft DOE/EIS-0541, 19 May 2020

“activities to hire, train, qualify, and retain required pit production personnel, recapitalization of equipment needed to restore Plutonium Facility (PF)-4’s ability to produce War Reserve (WR) [pits,] towards producing the first WR pit during 2023 [and] manage capital acquisitions to increase production capability of PF-4 to produce 10 pits per year.”<sup>6</sup>

NNSA’s goal is to produce 30 pits in 2026. The cost of the planned upgrades to PF-4 is estimated at \$1.75 billion through FY2025 with the total cost to be determined.<sup>7</sup>

*Given that LANL’s PF-4 facility, the location of the nation’s current pit production capabilities, has produced only 30 pits in a quarter century and is struggling to reestablish production by 2026, one wonders who is going to design the plutonium-pit production facility at SRS and train its workers? It would appear more prudent to let LANL prove its equipment and personnel-training abilities at Los Alamos first rather than stretch it thinner by establishing a parallel effort at SRS, which has no pit production experience whatsoever.*

## 2. The alternative of pit reuse

Delaying the SRS pit production facility by refurbishing and reusing existing pits during the life extension of existing warheads and the production of replacement warheads beyond 2030 is dismissed by a vague statement in the draft EIS (at Vol. 1, section 2.3.4):

“NNSA currently stages plutonium pits at Pantex. Like the pits in the active stockpile, those pits are aging and would not mitigate plutonium aging risks or enable NNSA to implement enhanced safety features to pits to meet NNSA and DoD requirements. Consequently, only reusing pits was eliminated from detailed analysis.”

A more substantive analysis is required – preferably in a Programmatic Environmental Impact Statement that would cover the contributions of the Kansas City Plant and LLNL as well as SRS, LANL and Pantex. Some relevant considerations are sketched here.

As already noted, almost all the pits currently in the US operational nuclear-warhead stockpile were produced between 1978 and 1989, which makes the oldest pits about 40 years old.<sup>8</sup>

The question is, how much longer will they last?

The 2005 Defense Authorization Act directed NNSA’s Administrator to commission an independent review of the efforts at LANL and LLNL to estimate pit lifetimes. The review was carried out by the JASON group of independent consultants and an unclassified summary of its findings was released in early 2007.<sup>9</sup>

The laboratories had been assessing the effects of aging effects on the functionality of US pits. They also had been doing accelerated-aging experiments on new samples of the plutonium alloy used in US pits by spiking them with Pu-238, which decays by alpha emission with a half-life of 88 years vs. 24,000 years for the dominant isotope in weapon-grade plutonium, Pu-239.

<sup>6</sup> Department of Energy *FY 2021 Congressional Budget Request*, Vol 1, “National Nuclear Security Administration,” p. 160.

<sup>7</sup> *Ibid.* pp. 195, 195

<sup>8</sup> Steve Fetter and Frank von Hippel, “Does the United States Need a New Plutonium-Pit Facility?” *Arms Control Today*, May 2004, Table 1, <https://www.armscontrol.org/act/2004-05/features/does-United-states-need-new-plutonium-pit-facility>.

<sup>9</sup> JASON, *Pit Lifetime* (MITRE Corporation, 2007) <https://fas.org/irp/agency/dod/jason/pit.pdf>.

2/1-e  
(Cont’d)

3/1-c  
4/4-f  
(Cont’d)

6/3-a

Frank N. von Hippel, Comments on Draft DOE/EIS-0541, 19 May 2020

The summary conclusion of the 2007 JASON report was,

“We judge that the Los Alamos/Livermore assessment provides a scientifically valid framework for evaluating pit lifetimes. The assessment demonstrates that there is no degradation in performance of primaries of stockpile systems due to plutonium aging that would be cause for near-term concern regarding their safety and reliability. Most primary types have credible minimum lifetimes in excess of 100 years as regards aging of plutonium; those with assessed minimum lifetimes of 100 years or less have clear mitigation paths that are proposed and/or being implemented.”

The JASON report also recommended additional research (pp. 17-18):

“to gain experience with Pu that has suffered the equivalent of a century or more of aging (i.e., with accelerated aging), thereby allowing an interpolation rather than an extrapolation in estimating performance changes and degradation due to aging. In particular, one wants to know the modes of failure that will be among the first to appear, because these can inform the stockpile surveillance program in order to make it most sensitive to aging-induced degradation [and] ongoing study of the current accelerated-aging Pu samples, which are spiked with the rapidly-decaying <sup>238</sup>Pu, as well as production of samples that have been aged by alternative means. In all of these cases, the objective is to get the equivalent of multi-century experience on aging phenomena, associated with decay (e.g., radiation damage) as well as with activated processes such as annealing.”<sup>10</sup>

At least some work on accelerated aging did continue and, in 2012, the Lawrence Livermore National Laboratory (LLNL) reported

“no unexpected aging issues are appearing in plutonium that has been accelerated to an equivalent of ~ 150 years of age.”<sup>11</sup>

The deputy program leader for enhanced surveillance of pit aging at Livermore was quoted as saying,

"In the near term, the nation can save tens of billions of dollars that might be required to build a new production facility,"

In March 2018, the Senate, in its report on the Energy and Water Appropriations Act for FY2019 directed the NNSA administrator to contract with JASON to do an update on its 2007 report and

“assess the efforts of the NNSA to understand plutonium aging and the lifetime of plutonium pits in nuclear weapons [and] include recommendations of the study for improving the knowledge, understanding, and application of the fundamental and applied sciences related to the study of plutonium aging and pit lifetimes, an estimate of minimum and likely lifetimes for pits in current warheads, and the feasibility of reusing pits in modified nuclear weapons. The report shall be submitted in unclassified form but may include a classified annex.”<sup>12</sup>

The Senate also instructed that the NNSA “Administrator shall make available all information that is necessary to successfully complete a meaningful study on a timely basis.”

JASON submitted a “letter report” on 23 November 2019 that informed Congress that<sup>13</sup>

<sup>10</sup> Not mentioned in the published JASON reports is the possibility that older retired pits may be available all the way back to the 1940s that could provide additional data on plutonium aging out to 75 years.

<sup>11</sup> “Plutonium at 150 years,” (Lawrence Livermore National Laboratory, 14 December 2012) <https://www.llnl.gov/news/plutonium-150-years>

<sup>12</sup> Senate Report, *Energy and Water Development Appropriations Bill, 2019*, p. 104, <https://www.congress.gov/115/crec/srpt258/CRPT-115/srpt258.pdf>

<sup>13</sup> JASON letter report, 23 November 2019, <https://fas.org/irp/agency/dod/jason/pit-aging.pdf>

Frank N. von Hippel, Comments on Draft DOE/EIS-0541, 19 May 2020

“in general, studies on Pu aging and its impacts on the performance of nuclear-weapon primaries have not been sufficiently prioritized over the past decade. A focused program of experiments, theory, and simulations is required to determine the timescales over which Pu aging may lead to an unacceptable degradation of primary performance.”

The JASON letter also suggests that, contrary to Congress’s instruction, NNSA did not cooperate adequately with the review:

“The labs briefly presented their program to address Pu aging to JASON. The plan seemed sensible, but a detailed JASON assessment would require additional information about the program as well as technical details.”

Laudably, NNSA was embarrassed by this fiasco and, on 6 April 2020, Administrator Lisa E. Gordon-Hagerty informed the Chairman of the Senate Armed Services Committee Subcommittee on Strategic Forces that NNSA planned to fund a second phase of the JASON study during the summer of 2020 to<sup>14</sup>

“Assess the need for the full study, and if deemed necessary and timely, perform a more detailed, multi-year JASON study.”

The letter also stated that

“NNSA has launched an enhanced program focused on understanding the potential effects of plutonium radioactive decay, or aging, on pit performance.

*Therefore, within a decade, important new information on pit aging should be available to inform a decision on whether a second pit production facility will be required.*

### 3. The need to produce new pits for new warheads

In addition to its concern about possible aging effects in the plutonium of the legacy pits, NNSA argues that the new facility is required “for producing pits with enhanced safety features to meet NNSA and DoD requirements” (Vol. 1, Sec. 1.3.2). There is no elaboration on this claim in the Draft EIS, but I am able provide some information because I was involved in this discussion almost 30 years ago, during the launch of the Stockpile Stewardship Program by the Clinton Administration.<sup>15</sup>

At the time, the weapon labs were proposing to replace the W78 ICBM warhead and the W76 and W88 submarine-launched ballistic missile (SLBM) warheads with warheads containing insensitive high explosive (IHE). That proposal has been sustained over the decades since through a number of incarnations, including proposals for warheads that would be “interoperable” between the ICBMs and SLBMs, but actually would have different variants for the ICBMs and SLBMs because of different fuses, reentry vehicles, etc., the benefit being a reduction in the size of the reserve warhead stockpile.<sup>16</sup>

The main argument, however, was for insensitive high explosive.

<sup>14</sup> Lisa E. Gordon Haggerty to Senator Deb Fischer, 6 April 2020, <https://fas.org/irp/agency/dod/jason/pit-aging.pdf>

<sup>15</sup> Frank von Hippel, “The Decision to End U.S. Nuclear Testing,” *Arms Control Today*, December 2019, <https://www.armscontrol.org/act/2019-12/features/decision-end-us-nuclear-testing>

<sup>16</sup> Lisbeth Gronlund, *Bad Math on New Nuclear Weapons: The Costs of the 3+2 Plan Outweigh Its Benefits* (Union of Concerned Scientists, 2015), <https://www.ucsusa.org/sites/default/files/attach/2015/11/Bad-Math-Nuclear-Weapons-3-Plus-2.pdf>



Frank N. von Hippel, Comments on Draft DOE/EIS-0541, 19 May 2020

The purpose of IHE is not to reduce the probability of an accidental nuclear explosion. Other elements of the safety design are supposed to do that, and, thus far, no warhead accident has resulted in a nuclear yield. The benefit from the use of IHE would be to reduce the number of accidents in which the chemical explosive around the pit detonates and disperses plutonium.<sup>17</sup> There were many such accidents involving aircraft-carried warheads prior to the decision in 1968 not to fly nuclear-armed aircraft in peacetime.<sup>18</sup> The Navy has had no such accidents with SLBM warheads, however, and therefore has in the past not been willing to invest in adapting new IHE warheads to its SLBMs, including flight tests.

7/1-f  
(Cont'd)

It appears, however, that the Navy has finally acquiesced or been overruled on this matter and the plan is to replace its two SLBM warheads, the W76 and W88, with new IHE warheads.

As I understand it, the current proposal is to build two new IHE warheads: the W87-1, which would replace the W-78 on the "Ground-Based Strategic Deterrent" (GBSD), the successor to the Minuteman III missile and potentially also the W-88 the high-yield warhead on the Trident II submarine-launched ballistic missile. A second warhead, sometimes referred to as the W93, would replace the W76.<sup>19</sup> Recent news reports indicate that the US is coordinating with the UK on the W93, since the warhead on the UK's SLBMs is closely related to the W76 and the US and UK SLBMs come from a shared pool of missiles.<sup>20</sup>

8/1-g

*W87-1.* The pit of the W87-1 would be identical to the pit of the W87-0, a warhead originally developed for the MX ICBM. W87-0s are currently deployed on the Minuteman III, and the plan is to use both W87-0s and W87-1s on the GBSD.<sup>21</sup> The 400 Minuteman IIIs are to be replaced one-for-one with GBSDs, which is, like the Minuteman III, to be deployed with only a single warhead per missile.

DOD reportedly has 540 W87-0s in stock with 200 deployed on the Minuteman III along with 200 W78s.<sup>22</sup> Therefore, the W78s, could be replaced with stored W87-0s.

In fact, as the *Draft EIS* notes, this same point was made during the EIS scoping process:

"There is a straight-forward alternative available right now that would lead to all the warheads on U.S. land-based missiles using insensitive explosives; that is to replace the W78s with W87 warheads currently in storage." (I, Table 1-1)

<sup>17</sup> S.D. Drell, John Foster and Charles Townes, *Nuclear Weapons Safety: Report of the Panel on Nuclear Weapons Safety* of the House Committee on Armed Services, 1990, <https://fas.org/irp/eis/guide-usa-drell-safety.pdf>

<sup>18</sup> Department of Defense, *Narrative Summaries of Accidents Involving U.S. Nuclear Weapons, 1950-1980*, <https://www.cia.gov/library/readingroom/docs/101014635.pdf>

<sup>19</sup> DOD's *Nuclear Weapons Matters Handbook 2020*, Figure 4.2, shows the W78 being replaced by the W87-1 beginning around 2030. The W87 and W88 are shown as being replaced beginning sometime around 2035-40, and the W76 is shown as being replaced beginning sometime around 2040-55. Their replacements are designated only as FBW (Future Ballistic Warheads), <https://www.acq.osd.mil/necbdp/nm/nmh/chapters/chapter4.htm>

<sup>20</sup> "Planned W93 Warhead Will Contribute to new U.K. Nuke, DOD Officials Say," *Defense Daily*, 13 February 2020, <https://www.defensedaily.com/planned-w93-warhead-will-contribute-new-u-k-uke-dod-officials-say/nuclear-modernization/>; Andrew Chuter, "Britain confirms new nuclear warhead project after US officials spill the beans," *Defense News*, 25 February 2020, <https://www.defensenews.com/global/europe/2020/02/25/britain-confirms-new-nuclear-warhead-project-after-us-officials-spill-the-beans/>; Dan Leone,

<sup>21</sup> *NNSA Has Taken Steps to Prepare to Restart a Program to Replace the W78 Warhead Capability* (US Government Accountability Office, 2018) Footnote 9, <https://www.gao.gov/assets/700/695759.pdf>

<sup>22</sup> Hans M. Kristensen and Matt Korda, "United States nuclear forces, 2020," *Bulletin of the Atomic Scientists*, 2020, Vol. 76, NO. 1, 46-60, Table 1, note d, <https://doi.org/10.1080/00963402.2019.1701285>

Frank N. von Hippel, Comments on Draft DOE/EIS-0541, 19 May 2020

Although the *Draft EIS* states in Vol. 1, p.14 that “[c]omments were considered in preparing this Draft EIS, I do not see any response to this comment.

DOD prefers to have two types of warheads available for each missile in case one type develops a problem but, because the W87-1 would have the same “physics package” as the W87-0, it would provide much less diversity than having a different warhead type.

It is possible also that DOD wishes to preserve the option of loading more warheads onto the GBSD in case of a breakdown in nuclear arms control with Russia. In the Clinton Administration’s Nuclear Posture Review, this was called the “warhead upload hedge”<sup>23</sup> To get three W87s on a GBSD would require a larger-diameter third stage than the Minuteman III has. Northrup-Grumman’s GBSD appears to have such a larger-diameter third stage.<sup>24</sup>

To fully load up every deployed GBSD with three warheads would require 1200 warheads, which would require more W87-1s and therefore more pits. No realistic circumstance that would require uploading the US ICBMs again has been suggested, however. In fact, the downloading to one warhead each was done to make the deterrent relationship with Russia more stable. Destroying one US warhead in a first strike would require more than one Russian warhead. Furthermore, in 2013, the Joint Chiefs reportedly informed President Obama that they could cover all essential targets in potential adversary nations with one third fewer warheads than the 1550 counted warheads allowed by New START.<sup>25</sup>

Also, many respected defense experts, including former Secretary of Defense Perry, argue that the US should abandon fixed land-based ICBMs because they are targetable, which has resulted in Strategic Command keeping them in a dangerous launch-on-warning posture.<sup>26</sup>

The *Draft EIS* is silent on these critical considerations.

**W93.** Relatively little firm information has been made public about the design of the proposed W93. NNSA’s *Fiscal Year 2020 Stockpile Stewardship and Management Plan* describes “the Next Navy Warhead,” as “not yet an established program of record.”<sup>27</sup>

An anonymous “senior defense official” has asserted, however, that the W93 would be “previously nuclear-tested designs, it’s not going to require any nuclear testing.”<sup>28</sup> This must mean that a previously tested IHE primary would be used.

<sup>23</sup> US Department of Defense, “Nuclear Posture Review,” 19, <https://fas.org/nukes/guide/usa/doctrine/dod/npr-slides-1994.pdf>

<sup>24</sup> This was pointed out by Hans Kristensen, 17 September 2019, <https://twitter.com/nukeslrmi/status/1173971761634926592>; see also the Northrup-Grumman cutaway, <https://news.northropgrumman.com/news/features/northrop-grumman-celebrates-60-years-supporting-air-forces-intercontinental-ballistic-missile-mission>.

<sup>25</sup> David Sanger, “Obama to Renew Drive for Cuts in Nuclear Arms,” *New York Times*, 10 February 2013, <https://www.nytimes.com/2013/02/11/us/politics/obama-to-renew-drive-for-cuts-in-nuclear-arms.html>. New START counting rules count each strategic nuclear bomber as a single warhead even though they could each carry many.

<sup>26</sup> William Perry, “Why It’s Safe to Scrap America’s ICBMs,” *New York Times*, 30 September 2016, <https://www.nytimes.com/2016/09/30/opinion/why-its-safe-to-scrap-americas-icbms.html>.

<sup>27</sup> *Fiscal Year 2020 Stockpile Stewardship and Management Plan* (NNSA, 2019) p. 2-37, footnote 1, [https://www.energy.gov/sites/prod/files/2019/08/f65/FY2020\\_SSPM.pdf](https://www.energy.gov/sites/prod/files/2019/08/f65/FY2020_SSPM.pdf).

<sup>28</sup> Patrick Tucker, “A New Nuclear Warhead? STRATCOM Chief Can’t Answer Yes or No,” *Defense One*, 27 February 2020, <https://www.defenseone.com/politics/2020/02/new-nuclear-warhead-stratcom-chief-cant-answer-yes-or-no/163395/>.

8/1-g  
(Cont’d)

Frank N. von Hippel, Comments on Draft DOE/EIS-0541, 19 May 2020

In 1990, in hearings before the Senate Appropriations Committee's Subcommittee on Energy and Water, DOE's then Deputy Assistant Secretary of Energy for Military Applications listed all US nuclear weapons with insensitive high explosive, including those that had been produced and deployed and some that were tested but not deployed as a result of the end of the Cold War:<sup>29</sup>

- B61-3, -4, -6, -8, -9, -10 tactical and B61-7 strategic bombs
- [Deleted]
- W80-0, -1 sea- and air-launched cruise missile warheads,
- B83 and B83-ALT 904 strategic bombs,
- W-84 warheads for the ground-launched cruise missile,
- W-85 warheads for the Pershing II intermediate-range ballistic missile,
- W87-0, -ALT 323, -1, ICBM warheads
- W89 SRAM II warhead (cancelled in Phase 3 development<sup>30</sup>)
- B90 NSB, -NDB strike and depth bombs (cancelled in Phase 3 development<sup>31</sup>)
- W91 warhead for the short-range (air-to-ground) attack missile, tactical, SRAM-T and for the follow-on to the Lance tactical missile warhead<sup>32</sup> (cancelled in Phase 3 development<sup>33</sup>).

8/1-g  
(Cont'd)  
5/1-b  
(Cont'd)

*If pits are used from warheads that were produced and retired, there will be no need to make new pits. If pits are selected from warheads that were tested but not produced or were not produced in sufficient numbers, then new pits will have to be produced. However, the production of pits that may or may not be needed for a warhead whose design has not yet been decided should not be used as a justification for urgently expanding US pit-production capacity beyond the currently planned expansion at LANL.*

#### 4. Need for a Programmatic EIS on Pit Production

The above issues should be dealt with in the Final EIS for Plutonium at SRS. They also require, however, a Programmatic EIS on the proposal for pit production, inspection, lifetime estimation, refurbishment and reuse in NNSA's larger complex, including the Kansas City Plant and LLNL, as well as LANL, Pantex and SRS.

4/4-f  
(Cont'd)

<sup>29</sup> Senate Appropriations Committee Subcommittee on Energy and Water Development, *Hearing on H.R. 5019, An Act Making Appropriations for Energy and Water Development for the Fiscal Year Ending September 30, 1991, and for Other Purposes*, p. 303

<sup>30</sup> <https://en.wikipedia.org/wiki/W89>; development phases are described in <https://www.energy.gov/sites/prod/files/2018/06/f53/6x%20process.pdf>.

<sup>31</sup> [https://en.wikipedia.org/wiki/B90\\_nuclear\\_bomb](https://en.wikipedia.org/wiki/B90_nuclear_bomb)

<sup>32</sup> House Appropriations Committee Subcommittee on Energy and Water Development, Hearings, Part 6, 12 March 1990, p. 584.

<sup>33</sup> <https://en.wikipedia.org/wiki/W91>.



Comments – EIS Public Hearing – April 30, 2020

Good evening, my name is Sharon L. Rodgers and I am the President of the United Way of Aiken County. I have lived in Aiken County for almost forty years.

This year marks the 70<sup>th</sup> anniversary of SRS in Aiken County. United Way of Aiken County owes its very existence to SRS.

At this critical time in our nation's history, United Way of Aiken County is proud to support SRS to be considered for the Plutonium Pit Production mission and for our community to host such an important national security mission. Why SRS? Quite simply, SRS has been operating safely in our community for 70 years and has been involved with nuclear materials since inception and plutonium for many decades. SRS has the experience and technical knowledge. SRS has the benefit of an enormous campus to expand facilities for the project and the capability to safely perform this mission.

Moreover, SRS has the talent and resources to provide an effective, responsive and resilient nuclear weapons infrastructure and the flexibility to respond to changing requirements.

SRS employees have been successfully and safely executing its mission for 70 years. SRS has a world-class safety culture and has operated 24/7 for 70 years.

Aiken County welcomes this new mission which will provide construction and operations employment opportunities and investments that will benefit our region.

Lastly, SRS contractors and employees are active and engaged partners in our community. They are our go-to supporters. They are our largest contributor, helping to support 30 partner agencies and 45 critical need programs, benefitting vulnerable seniors, children, disabled, underemployed and people in crisis. They provide the four Ts; Time, Talent, Treasure and Testimony. This year, over 300 volunteers worked at 27 different sites during our day of caring. These volunteers serve as Board members and committee members. They help support our schools and provide our community with many resources.

I am honored to support SRS. They care about our community and their mission to make the world safer. Thank you!

1/5-b

-----Original Message-----

From: herberthomes3@comcast.net <herberthomes3@comcast.net>

Sent: Thursday, May 21, 2020 8:52 AM

To: NEPA-SRS <NEPA-SRS@srs.gov>

Subject: [EXTERNAL] SRS Pit Project

My company is Herbert Homes , Inc. and I have been incorporated since 1984 I believe that SRS is the right location for the Pit Production at the site. SRS has over 70 years of experience Safely managing nuclear materials. By creating new jobs and maintaining current jobs this will keep our community strong.

The economic impact from SRS is tremendous to our local economy and our lives.

I am thanking you in advance for your consideration.

Respectfully submitted,

Mark Herbert  
Office 706-210-7114  
Cell 706-533-2600  
Fax 706-210-9945  
5104 Pierce Court  
Evans,Ga. 30809

Let's Build a Home

1/5-b

May 25, 2020

Ms. Jennifer Nelson  
NEPA Compliance Officer  
National Nuclear Security Administration  
Savannah River Field Office, P.O. Box A  
Aiken, South Carolina 29802  
[NEPA-SRS@srs.gov](mailto:NEPA-SRS@srs.gov)

Re: Proposed SRS Plutonium Bomb Plant Draft Environmental Impact Statement

Dear Ms. Nelson:

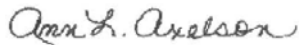
I submit the following comments to be considered by the NNSA and ask that they be made a part of any official record relating to EIS comments.

I am concerned about any discussion of expansion of the production of nuclear weapons of any type, including plutonium pits. It is my belief that we do not need to add to the proliferation of nuclear weapons globally nor encourage other countries to build additional nuclear weapons by doing so in the U.S.

A greater concern for me is the creation of additional chemical and nuclear waste streams into the South Carolina environment. The Savannah River site already has far too much nuclear waste that is left over from previous production of plutonium and nuclear weapons materials that should be cleaned up.

I support the "no action" alternative where no plutonium pit production will be allowed at the MOX facility.

Sincerely,



Ann L. Axelson  
11 Quartermaster Dr.  
Salem, SC 29676

1/2-c

2/6-j.6  
3/6-j.8

**From:** Kim Bergier <2mistnbc@gmail.com>  
**Sent:** Saturday, May 23, 2020 2:39 PM  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>; Brian A Costner <brian.costner@hq.doe.gov>; Bruce M Diamond <bruce.diamond@nnsa.doe.gov>; NEPA.comments@npo.doe.gov; lanlsweissa@nnsa.doe.gov  
**Subject:** [EXTERNAL] Site-wide EIS is necessary before UPF at Y12

Department of Energy  
National Nuclear Security Administration  
Office of General Counsel  
Washington DC, 20585

To whom it may concern,

Thank those who made it possible to extend the deadline for public comments from May 11<sup>th</sup> to May 26<sup>th</sup>, due to the COVID-19 Pandemic.

So that you know that I understand most of this background, here is my brief bio around this issue. In July 1963, only 18 years after the first use of an atomic bomb on Hiroshima, Japan, as a 12-year-old daughter of Methodist Missionaries returning to the U.S. from where they served in India for most of their 38 years, we were given a tour of the destroyed city by Rev. Kiyoshi Tanimoto. As a friend of my fathers, since they attended Seminary together, I remember Tanimoto's first-hand accounts, which is mostly written up in John Fuller's book "Hiroshima". This book opened up to the world the consequences of the first use of a weapon of mass destruction on a city made up of mostly citizens in wooden homes. This was a life-changing experience for me and I have prioritized doing the most that I can to stop nuclear weapons for 38 years. Within the following year, our family visited the American Museum of Science and Energy in Oak Ridge, Tennessee and I wondered why there were no scenes of the total destruction. Many years later some members of OREPA helped establish the display of pictures from Hiroshima (at least in the previous museum).

I am the Coordinator for the Michigan Stop The Nuclear Bombs Campaign (MISTNBC). Over the last 20 years, I have helped bring 327 other individuals, that I know of, to travel from Michigan to Tennessee to attend and take part in the Actions organized by the Oak Ridge Environmental Peace Alliance (OREPA). Many of us have made multiple trips so my estimated count of trips made from Michigan is over 600, not counting two previous DOE public hearings. A key reason I have learned about all this is because I have lived in East Tennessee around 7 years but mostly because I have three siblings that live there and my older sister invited me to OREPA Action in August 2000, after she joined their Board of Directors. Thanks to my sister, not only do I have a place to stay, but I have often visited several days, up to two weeks, taking part in many of the events which OREPA has organized. I have traveled to New York City, twice around the Nuclear Non-Proliferation Review Conferences plus multiple trips to Washington D.C. to lobby my legislators, especially with The Alliance for Nuclear Accountability.

In the words of Ralph Hutchison, the Coordinator of the Oak Ridge Environmental Peace Alliance, I am aware that "The National Nuclear Security Administration, on April 9, 2020, released a Draft [Supplement Analysis](#), a document that analyzes the earthquake hazard from the continued operation of out-of-compliance buildings for nuclear weapons manufacturing at the Y-12 National Security Complex in Oak Ridge, Tennessee. The analysis was ordered by federal judge Pamela Reeves in September 2019 in the lawsuit brought by OREPA, Nuclear Watch New Mexico, Natural Resources Defense Council and four individual plaintiffs."

1/8-a

I strongly object to the NNSA's determination that no further analysis is needed and its plans to continue dangerous enriched uranium operations in out-of-compliance facilities for 20-30 more years can move forward. The potential risks from an earthquake would have a profound effect on the offsite public which is largely unaware of the risks being imposed on them by the NNSA.

Ralph has helped us learn that: "The National Nuclear Security Administration released its third Supplement Analysis [SA] for the Y-12 Nuclear Weapons Complex. The new SA examines a worst-case scenario for the current plan and finds the consequences would be "ten times greater" than the original UPF plan (p.31) previously disclosed in the 2011 Site-Wide Environmental Impact Statement; the difference is in the continued use of out-of-compliance facilities. The scenario estimates 1.5 million people could be exposed to risk from an earthquake and subsequent fire and events triggered by an earthquake. The injury and death toll for workers is estimated to be "no more than 100." NNSA is required to take a hard look at the environmental impacts that would occur if a design basis earthquake were to strike East Tennessee. These are not just technical concerns they are real threats."

As to the overall development of U.S. nuclear weapons I need to express my deepest concerns. On 4-6-2020, in an open letter to Jay Coghlan, Executive Director of Nuclear Watch New Mexico, Bruce M. Diamond, General Counsel for NNSA, describes how the building of U.S. nuclear weapons is the "foundation for national security". I understand that this the government policy which trillions of dollars are being allocated for but I respectfully totally disagree. It defies basic common sense to think that anyone is more "secure" as long as there is even a single nuclear weapon. Most people do not know or understand the total threat to the ecosphere on our precious planet that nuclear weapons pose, especially thermonuclear weapons on Trident submarines.

If nothing else, this global COVID-19 Pandemic is showing the world that we are all interdependent, connected, and vulnerable human beings. At least there's not radiation for hundreds of thousands of years, an electronic magnetic pulse which would destroy most electrical equipment and thus communications and complete destruction of cities as the use of thermonuclear bombs would cause. Thus, I do not feel at all secure with the premise of Mutually Assured Destruction as a defensive justification for nuclear weapons. Making the new class of nuclear weapons smaller thus more "usable" is also quite frankly "crazy", in my opinion.

Sincerely,

Kim Joy Bergier

25720 Miracle Drive

Madison Heights, MI 48071-4111

-

Kim Joy Bergier

Coordinator of Michigan Stop The Nuclear Bombs Campaign (MISTNBC)

1/8-a  
(Cont'd)



---

**From:** Chris G <chrisgug@hotmail.com>  
**Sent:** Tuesday, May 26, 2020 9:52 AM  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>  
**Subject:** [EXTERNAL] Draft SRS Pit Production EIS Comment

Hello

I think this is another project that will cost too much and with the DoE record of past projects it may not even be completed.

I see this just being MOX 2.0. I could go on with the list of failures that this department. The only reason that the DoE is still around is that your the DoD's tool.

Personally I would like to see the state remove this pimple from it backside known as SRS. If not full removal a reduction. That would be what's best for the environment. Not having the hottest building in basically my backyard.

DoE should fix the cap in the Marshall Islands beforehand if you care so much about the environment.

Thank you  
Chris Gugumuck

1/5-a

**From:** Laura Hartwig <laurahartwigdesign@gmail.com>  
**Sent:** Monday, May 25, 2020 10:22 AM  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>  
**Subject:** [EXTERNAL] Comments on the Draft EIS on the Proposed SRS Plutonium Bomb Plant

Ms. Jennifer Nelson  
NEPA Compliance Officer  
National Nuclear Security Administration

Dear Ms. Nelson:

I hereby submit the following comments on the proposed "Savannah River Plutonium Processing Facility" and ask that they be made part of the official record.

I am concerned about the proposal to expand the role of the Savannah River Site into the production of plutonium pits. I raise the following issues to be responded to in any final EIS:

Pit production would produce a host of chemical and nuclear waste streams and it is unacceptable that dumping of low-level nuclear waste in unlined trenches at SRS is being considered. Waste management at SRS has been irresponsible and no new production should be undertaken until past problems are corrected. Pit production could distract from the main mission of the site and the largest amount of funding - cleaning up tens of millions of gallons left over from production of plutonium and nuclear weapons materials.

Producing new-design nuclear weapons and replacing pits in the entire stockpile could stimulate a costly new nuclear arms race. The discussion of the exact technology to be used to purifying plutonium is lacking, as are the environmental and health impacts associated with this.

In conclusion, I support the "no action" alternative whereby the MOX facility would not be converted to plutonium pit production.

Thank you,

Laura Hartwig  
WordPress Website Development & Training  
[LauraHartwigDesign.com](http://LauraHartwigDesign.com)  
[LauraHartwigDesign@gmail.com](mailto:LauraHartwigDesign@gmail.com)  
845-206-9908

1/6-j.6  
2/6-j.8

3/2-g  
4/3-g

Ms. Jennifer Nelson, NEPA Document Manager  
NNSA, Savannah River Field Office  
P.O. Box A  
Aiken, SC 29802  
[NEPA-SRS@srs.gov](mailto:NEPA-SRS@srs.gov)

May 25, 2020



LWV/SOUTH CAROLINA

Dear Ms. Nelson:

**The League of Women Voters of South Carolina supports “A No Action Alternative” regarding the construction of plutonium pits at SRS.**

**If DOE continues to pursue this mission, LWV/SC urges a comprehensive Programmatic Environmental Impact Study (PEIS) of this proposed new pit mission at SRS.**

The LWV/SC opposes this proposal to build plutonium pits at the Savannah River Site (SRS) for the following policy reasons:

(1) The League supports the “No Action Alternative.” The goal of the Nuclear Non-proliferation Treaty (NPT) is to end nuclear weapons development. The LWV/US actively supported the NPT in the 1960s, and continues to do so: “Declaring their intention to achieve at the earliest possible date the cessation of the nuclear arms race and to undertake effective measures in the direction of nuclear disarmament.” For more than three decades the NPT has demonstrated the world’s possibility to control much proliferation. There is no new information to support this proposal. To the contrary, this nation’s interest in “refreshing” weapons systems has stimulated nuclear arms activities in the international community.

(2) The League of Women Voters/SC has been monitoring the very slow progress in cleanup of legacy wastes at SRS for almost 40 years. These wastes are in 43 old ~Olympic-pool-sized underground tanks. The most recent closure was last December, and the next tank closure seems to be scheduled for 2024. Decades will be required to clean what can be cleaned from these troublesome tanks, and to close what can be closed. This EIS fails to address costs, processes, and schedules for treating the additional wastes to be generated by this competing proposal – which triples some of the existing volumes of untreated legacy wastes currently at SRS. Post-pit cleanup management is not fully addressed.

The EIS is insufficient. If DOE persists, a PEIS for the pit proposal at SRS should address:

(1) On-site and off-site contamination at other DOE sites charged with this mission, and analyses to avoid such releases at SRS or elsewhere in the future.

1/5-a

2/2-c

3/6-j.8

4/4-f

(2) Effects on staffing and scheduling of the proposed new mission on current SRS cleanup schedule programs and responsibilities, especially legacy underground tank closures.

(3) A candid assessment of stockpiles of plutonium at all DOE sites and their lifetimes, as judged by independent professionals.

(4) Detailed description, cost, and schedule of safe management and treatment of pits wastes for indefinite storage at SRS until such time as shipment to a suitable federal repository becomes a possibility.

(5) If WIPP disposal is part of the PEIS, how many and which federal facility wastes will be "bumped" to enable both the current planned SRS shipments as well as this proposed new volume of SRS TRU storage at WIPP.

(6) The plan for the future of the newly imported 'pits' plutonium if the billions of appropriations necessary to produce pits does not receive sufficient and steady funding by Congress.

(7) Given the difficulty of hiring skilled professional staff and obtaining specialized materials, as demonstrated during the construction of the MOX shell, what is the plan for workforce adequacy over the next 30 years - in a less-than-resilient industrial environment.

(8) Having experienced serious MOX financial and scheduling problems with the similar huge and hurried "design/build/redesign/rebuild..." project, why should DOE not expect similar financial and scheduling problems with this new proposal? Why does DOE assume the MOX shell is in fact suitable for this purpose? Why another hurried project?

Sincerely,

Suzanne H Rhodes  
LWV/SC SRS Waste Monitor  
Post Office Box 8453  
Columbia SC 29202  
[suzrhodes117@yahoo.com](mailto:suzrhodes117@yahoo.com)

copies: LWV/SC Holley Ulbrich and Christe McCoy-Lawrence

4/4-f  
(Cont'd)

5/3-j

---

**From:** Joanne Steele <savannahriverpilgrim@gmail.com>  
**Sent:** Monday, May 25, 2020 6:08 PM  
**To:** NEPA-SRS <NEPA-SRS@srs.gov>  
**Cc:** Tom Clements <tomclements329@cs.com>; Glenn Carroll <atom.girl@nonukesyall.org>; Priscilla Preston <priscilla.preston@alumni.unc.edu>; Charles Utley <bredlutley@gmail.com>; Ellen Thomas <et@prop1.org>  
**Subject:** [EXTERNAL] Draft SRS Pit Production EIS comment

May 25, 2020

Draft SRS Pit Production EIS Comment

My father was a WWII US Marine Veteran who fought in the Peleliu. This Memorial Day, in honor of him and those who died for our country, I write this letter to comment on the Draft SRS Plutonium Pit Production Facility EIS.

Dad worked at Martin Marietta (Lockheed Martin) on various nuclear weapons during the Cold War. Before he died of cancer he told me they thought nuclear weapons were supposed to protect us, but he learned that creating them polluted our country and the workers had cancer and heart disease. He gave me his blessing to find a better way to protect our families, nation and world.

While we face the real threats of a global pandemic and climate change, the National Nuclear Security Administration appears to be working for the security of weapons contractors, not the security of our country. Violating legal requirements for a full Programmatic Environmental Impact Statement involving the full combined environmental impact of all facilities in this nuclear bomb trigger production, they held a Virtual hearing for public comment because they don't want to get sick while they seek funding to destroy life on the planet. It's a bad jobs program creating radioactive waste and endangering generations into the future.

1/4-f  
2/4-b  
3/5-a

The Department of Defense and Department of Energy would better serve our country and honor those who died defending her by redirecting efforts and funding to a sustainable economic recovery, creating efficient affordable housing, health care, clean drinking water, and an overhaul of the national infrastructure.

4/5-a

It is time to abolish nuclear weapons.

Sincerely,

Joanne Steele

Nuclear Watch South

Board President