

From: Mary Steffes <maryinclemson@gmail.com>
Sent: Sunday, May 24, 2020 1:51 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] SRS Plutonium Bomb Plant

Attn: Ms Jennifer Nelson

Please make this comment part of the public record:

The waste mess left over from previous activities at the SRS must be cleaned up prior to the consideration of any new plan for nuclear bomb production at this site.

Thank you.

- Mary Steffes
11 Essex Dr.
Clemson, SC 29631
508-728-8191

1/6-j.8

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

From: Jay Coghlan <jay@nukewatch.org>

Sent: Friday, May 22, 2020 2:00 PM

To: NEPA-SRS <NEPA-SRS@srs.gov>; NELSON, JENNIFER <Jennifer.Nelson@nnsa.srs.gov>; Marylia Kelley <marylia@earthlink.net>; Tom Clements <srswatch@gmail.com>; Ralph Hutchison <orep@earthlink.net>

Subject: [EXTERNAL] requesting that NNSA set up an automatic reply that comments have been received when emailed.

Greetings Jennifer:

I hope this finds you well and that you're staying safe.

I look forward to submitting formal comments on the SRS DEIS by June 2.

That said, given the difficulty NNSA experienced in recording SRS DEIS scoping comments sent by email, I am requesting that NNSA set up an automatic reply that comments have been received when emailed.

To underscore this, I have yet to receive acknowledgement from NNSA that it received my May 9 comments on the LANL SA. I think NNSA should always set up an automatic reply for its NEPA processes that acknowledge receipt of emailed comments.

Thank you for considering,

Jay

--

Jay Coghlan, Executive Director
Nuclear Watch New Mexico
903 W. Alameda #325, Santa Fe, NM 87501
505.989.7342 c. 505.470.3154
jay@nukewatch.org

1/4-j

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

From: Austin Boyd <atb1232010@hotmail.com>

Sent: Wednesday, May 27, 2020 11:34 AM

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

Subject: [EXTERNAL] Pit project

I am in favor, & would like to join the project

Austin boyd

Pipefitter

LU150

Sent from my iPhone

| 1/5-b

From: Tommy Chavous <tommy.chavous@yahoo.com>
Sent: Wednesday, May 27, 2020 12:20 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] Pit Project.

We are totally in favor of the Pit Project at SRS. As an American National Defense is very important to me and my family. As a area resident the added boost to the economy is paramount. Why let another DOD/DOE site reap the benefits when we have the infrastructure and prebuilt commodities already in place.

[Sent from Yahoo Mail on Android](#)

1/5-b

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

From: Josh Clayton <josh_clayton92@yahoo.com>

Sent: Wednesday, May 27, 2020 11:33 AM

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

Subject: [EXTERNAL] PIT project

I am in favor of the project

Sent from my iPhone

| 1/5-b

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

From: Bobby Conway <bconway506@gmail.com>

Sent: Wednesday, May 27, 2020 12:11 PM

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

Subject:

Yes I am in favor LOCAL 150

Sent from my iPhone

| 1/5-b

From: Joshua Crapps <crapps.joshua@gmail.com>
Sent: Thursday, May 28, 2020 7:38 AM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] PIT Project job at SRS

I am in favor of the PIT Project job at SRS. Looking forward to working with you.

1/5-b

Respectfully,
Mr. Joshua M. Crapps

Sent From the Field

The Crapps Farm
253 Martin Freeland Rd.
McCormick, SC. 29835

(706)589-0495 (Sales)
(706)589-0410 (Owner)

Certified SC Grown • Certified Homegrown By Heroes

Follow us on Facebook and Instagram @thecrappsfarm

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From: Nick King <Carlsbadmennonite@gmail.com>
Sent: Wednesday, May 27, 2020 4:55 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] SRS Pit Production EIS Comment DOE/EIS-0380-SA-06

In regard to the continuation or ramping up of plutonium pit production at LANL, I need to make the following comments:

Other than for the economic benefit of a few, and the perverted patriotism of imperialism, there can be no justification for plutonium pit production anywhere in the world that creates more nuclear weapons. This is much more reprehensible and on a much larger scale than Hitler's extermination camps for killing people. This is as honorable as being a contract killer where we are willing to kill millions for a little bit of money for us now. Have we no decency, no values other than money and brute aggression? How then is our government any different than the drug cartels or the Third Reich, only bigger, more lethal and more self serving?

1/5-a

As for the Environmental Impact Statement and its many distracting details, the elephant in the room is that nuclear weapons are bad for the planet, as well as locally. No one can dispute that. And we don't even have a way to dispose of the mountain of radioactive waste this would create which will affect the environment for thousands of years to come.

2/6-j

Can we not see the bigger picture of how we are all complicit in this demonic scheme? If building offensive nuclear weapons is what it means to be American, then I sadly renounce my American citizenship, and all the weapons of mass destruction associated with it. As a citizen of the Kingdom of God, there is no room for hate, fear, mass murder, or anything associated with that. Which kingdom, which God will we choose?

3/8-a

Sincerely,
Nicholas King

Nicholas King
Carlsbad Mennonite Church
www.CarlsbadMennonite.org
575 887 5104
575 887 0606 cel.

Continuing to build God's Kingdom

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

From: mitchell patterson <mitch.theo@gmail.com>
Sent: Thursday, May 28, 2020 12:45 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] Pit project

Yes I am in favor of the pit project. I worked at the Mox project and it would be terrible not to utilize some of the Mox building
Sent from my iPhone

| 1/5-b

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

From: Erik Smith <easyesmith@gmail.com>

Sent: Thursday, May 28, 2020 6:15 AM

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

Subject: [EXTERNAL] PIT Project

Erik Smith, Local 150. Yes I would like to work at the PIT Project. 706-220-0657
Sent from my iPhone

1/5-b

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

From: Steven Sondheim <StevenSondheim@yahoo.com>

Sent: Wednesday, May 27, 2020 4:58 PM

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

Subject: [EXTERNAL] Draft SRS Pit Production EIS Comment

Please slow down the approval of additional unneeded production and consider the impacts.

Sent from my iPhone

1/5-a

From: Robert Spence <dmaxxrs.84@gmail.com>
Sent: Wednesday, May 27, 2020 4:09 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] PIT project SRS.

I and most all of the CSRA are in favor of the PIT project at SRS, SC has a qualified work force and the infrastructure to handle this mission safely and efficiently.

Thanks, R. L. Spence.

1/5-b

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

From: Barbara Antonoplos <briarpatchbetty@gmail.com>
Sent: Friday, May 29, 2020 6:27 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] proposed SRS plutonium pit operation

Dear Ms. Nelson,

Regarding the proposed new plutonium pit production operation at Savannah River Site—NO. SIMPLY, NO!

The U.S. should not be producing more pits for nuclear weapons. We should be destroying our nuclear weapons, not shoring them up! Producing new, utterly unnecessary plutonium pits would only escalate the proliferation of nuclear weapons worldwide, to say nothing of being a massive expenditure of government money that should be directed elsewhere for the common GOOD. Furthermore, the Savannah River Site already has more nuclear contamination than can ever be properly addressed, and adding to it would be a dangerous and environmentally abominable enterprise. And the mandated, full environmental analysis for it has not even been completed.

1/5-a

This decision is simple: No more!!

Sincerely,

Barbara Antonoplos

From: Sam <samb5@yahoo.com>
Sent: Monday, June 1, 2020 10:38 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: Re: Automatic reply: [EXTERNAL] Opposing building a plutonium bomb pit plant at the SRS without a comprehensive Environmental Impact Statement

Thank you for your prompt acknowledgement!

I should clarify that I am asking for a Programmatic Environmental Impact Statement (PEIS).

1/4-f

Yours,
Samuel L. Baker
Columbia, SC

On Monday, June 1, 2020, 10:19:19 PM EDT, NEPA-SRS@srs.gov <nepa-srs@srs.gov> wrote:

Thank you for your comments. Please note the public comment period was extended to June 2, 2020. The on line Public Hearing was held April 30 and the slide presentation from the hearing is posted online with the Draft EIS on the NNSA NEPA Reading Room.

From: THE BIG APPLE Columbia, SC <bigappledance@gmail.com>
Sent: Tuesday, June 2, 2020 2:28 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] Draft SRS Pit Production EIS Comment

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

Subject line: Draft SRS Pit Production EIS Comment

Dear Ms. Nelson:

I hereby submit the following comments on the Draft Environmental Impact Statement for Plutonium Pit Production at the Savannah River Site in South Carolina 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 and which will pose a serious challenge. With the disastrous outcome of pit production at the contaminated Rocky Flats Plant in mind, I raise the following issues to be responded to in any final EIS:

1/1-h

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. As the waste figures in the draft EIS relies on old information from earlier documents not related to pit production at SRS, please provide new calculations based on pit production in the terminated MOX plant.

2/6-j.6

Pit production could distract from the main mission of the site and the largest amount of funding - cleaning up tens of millions of gallons of high-level nuclear waste left over from production of plutonium and nuclear weapons materials. Please discuss impacts to the SRS clean-up budget and to the overall budget of DOE's Office of Environmental Management.

3/6-j.8

Discuss impacts of a plutonium fire, as took place at Rocky Flats, on the environment, front-line workers and downwind communities, many of which are comprised of minorities, such as the Barnwell, SC area and Shell Bluff, Georgia (directly across the Savannah River from SRS). Discuss impacts of a nuclear accident at the pit plant on the operation of commercial nuclear reactors at Plant Vogtle, across the river in Georgia.

4/6-1.2
5/6-1.3
6/6-i.2

Discuss impacts to the pit site and the SRS support infrastructure of climate change causing localized

7/6-1.4
8/6-d.1

increases in tornadoes, hurricanes and other extreme weather events.

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. Please discuss the threat of a new nuclear arms race.

9/2-g

Please discuss how producing pits for 80 or more nuclear weapons per year - at SRS and Los Alamos - until all pits are replaced in all nuclear weapons complies with the legal requirements in the Nuclear Non-Proliferation Treaty "to pursue negotiations in good faith on effective measures relating to cessation of the nuclear arms race at an early date and to nuclear disarmament, and on a treaty on general and complete disarmament under strict and effective international control."

10/2-b

Discuss exactly what new-design weapons pits would be for must be discussed, including the W87-1-like and W93 warheads. Under what circumstances would new-design weapons and new pits be subjected to underground nuclear testing?

11/2-d

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 and refurbishment be thoroughly analyzed before new pit production is considered. Discuss pit reuse in detail.

12/3-a

The discussion about the exact technology to be used to purify plutonium at SRS is lacking, as are the environmental and health impacts associated with this.

13/6-p.1

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 or a policy change? Please affirm that no more plutonium will be shipped to South Carolina as long as existing plutonium remains stored at the site.

14/6-j.2

Before "repurposing" is considered of the ill-constructed MOX plant, on which \$8 billion was wasted, there must be investigations into potential waste, fraud, abuse and mismanagement with the MOX debacle. Please provide evidence that such investigations are taking place and that the many MOX plant construction problems will be publicly identified.

15/8-d

The impact of pit production on the legally mandated cap on the volume of the Waste Isolation Pilot Plant (WIPP) in New Mexico to receive transuranic (plutonium) waste must be reviewed, along with the scheduling and volume impact of receipt of TRU waste from both the pit facility and other DOE sites.

16/6-o.1

Details of the role of the Y1-2 National Security Complex in providing HEU or other support for pit production must be fully discussed.

17/6-p.2

I support preparation of an over-arching, legally mandated Programmatic Environmental Impact Statement (PEIS) which would examine the need for expanded pit production and the role in program support, pit design, pit production and waste handling at DOE sites across the country, including SRS, Los Alamos, Pantex, Y-12, the Waste Isolation Pilot Plant, Sandia, the Nevada Nuclear Security Site, and

18/4-f

the Kansas City National Security Campus (which supplies non-nuclear components for all nuclear warheads). The PEIS must be completed before the final EIS on SRS pit production or the Supplement Analysis on pit production at Los Alamos are finalized. NNSA's plans for SRS and Los Alamos are inextricably linked and those plans must should be reviewed in a single document, the legally required PEIS

In conclusion, I support the "no action alternative" whereby the poorly constructed MOX facility would not

19/5-a

be converted to plutonium pit production and that this alternative not be linked to pit production at Los Alamos.

19/5-a
(Cont'd)

Thank you for considering my comments and for responding to them. Please confirm receipt of these comments.

W. G. Breedlove
1414 Gregg St
Columbia, SC 29201

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

From: info@scchamber.net <info@scchamber.net> On Behalf Of South Carolina Chamber of Commerce
Sent: Monday, June 1, 2020 1:23 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] Form submission from: Plutonium Pit Production Comments

Submitted on Monday, June 1, 2020 - 13:22 Submitted by anonymous user: 216.186.180.100 Submitted values are:

Name: Edward L. Burr

Company Name: University Health, Inc.

Job Title: Chief Administrative Officer and Senior VP for Legal Affairs Mailing Address: 707 Michaels Creek, Evans, GA 30809 Phone Number: 706-774-8063 Email Address: eburr@uh.org Use suggested comments? No

Your Comments: The Savannah River Site is the right location for the Pit Production mission. It 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. As a retired Army officer, I am proud that the Site is in my backyard. The surrounding communities in South Carolina and Georgia have consistently and strongly supported the Site. During my over thirty years as a senior executive for the largest health care provider in the area, I have observed the reciprocal support the Site furnishes to the community. Last year as the Chair of the Columbia County Chamber I witnessed both the extent and the sincerity of the Site's involvement in the betterment of our communities. The many employees who work at SRS are our neighbors, actually over 1400 employees live in Columbia County, 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/6623>

From: kevin collins <kvn.clns.92@gmail.com>
Sent: Monday, June 1, 2020 3:38 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] comments on draft EIS

Comments on Savannah River Draft Environmental Impact Statement

Dear Ms. Nelson

I understand that the NNSA recently released a Draft Environmental Impact Statement (EIS) concerning its Savannah River Site in South Carolina which is slated for plutonium pit production. I oppose the plutonium pit production which falls under the No Action Alternative in the Draft EIS.

1/5-a

I also understand that the US has over 15,000 plutonium pits in storage at Pantex in Amarillo, TX. It seems that that number is quite sufficient for any foreseeable need for said pits. This reuse of the pits should be included in a new Programmatic EIS (which I believe is legally mandated) prior to issuing a comprehensive site-specific EIS which analyzes the full environmental impact of an unnecessary new bomb production plant. Programmatically, with so many pits on hand, cancels the need for a new multi-billion-dollar facility.

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

I believe it is also redundant to produce and/or replace plutonium pits given that the US has over 4,000 nuclear warheads in its stockpile which are certified reliable and will be for the next 50 years. It also seems redundant since the US already has the capacity for plutonium pit production at Los Alamos National Lab and, in fact, is also planning to expand that facility. Why the duplication?

I am also concerned about the potential of radioactive and toxic waste release and contamination. Nuclear production facilities have a poor record (at best) of waste disposal. Why increase the production of waste when we can't handle what we have? Rather think about health and safety.

1/5-a
(Cont'd)

It seems obvious to me but building new bomb-production facilities seems like a provocative act which supposes the need for increasingly dangerous weaponization. We have enough bombs. We do not need a new bomb plant not at Savannah River, not anywhere.

Sincerely,
Kevin D. Collins, M.Div., Ph.D. (candidate), TRLS
8104 Becky Lane
Knoxville, TN 37920

From: Ck Coney <ckconey@gmail.com>
Sent: Monday, June 1, 2020 8:13 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] Public Comment re: Opposition to Plutonium Pit Production Proposed for SRS in Draft EIS

June 1, 2020

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,

When I lived in Atlanta I visited the Savannah River Site and was appalled by what I saw, especially the health impacts on local residents, many people of color just trying to live and fish in clean streams. I now live in NC and as a Duke Energy customer feel I have stakes here. The proposed Plutonium Pit Production Factory planned for the Savannah River Site (SRS) is unnecessary and very dangerous. I have studied the technologies, past and present, and I still believe plutonium is a dangerous substance that's dangerous at all levels: production, storage, disposal and ownership. The U.S. has a history of horrors from radioactive waste problems. I researched much of this history at the DOE research archives in Gaithersburg, MD, via FOIA privilege to access materials. I am opposed to nuclear fission AND fusion...too much risk and too many unknowns persist.

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 severely 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 that a volatile plutonium facility would attract. These facilities could be faced with intruders, via physical attack and hacking...resulting in grave risk to our Homeland.

1/4-g
2/2-g
3/6-1.1

The 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 the rest of the world and should be showing leadership in nuclear dismantlement and disarmament.

4/2-a

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

5/2-h

pits for nuclear weapons with publication of this EIS. It amounts to a theft of public trust and taxpayer funding to switch tracks from a nuclear security and environmental management program to a nuclear weapons manufacturing program.

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 support 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. In DC I attended Congressional hearings re: Yucca Mountain...and storage remains a severe challenge. 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. Rocky Flats and Hanford were two sites I personally researched via DOE archives in Gaithersburg, MD. 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 re-purpose the MOX factory to responsible management of the plutonium already stranded in South Carolina...by converting it to plutonium immobilization.

We 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).

Since I am a long-time researcher and advocate of a measured and wise approach to nuclear power and weaponry, I urge NNSA and DOE to provide the necessary leadership to get the plutonium immobilization option restored and funded. Please do so by including it in the final EIS.

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

Respectfully submitted,

Carol K Coney
42 Scenic
Asheville NC 28805

6/4-c

From: Margaret Cowan <cowanmp@me.com>
Sent: Friday, May 29, 2020 3:55 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] Savannah River nuclear weapons site

Dear Ms. Nelson:

I am writing to oppose plutonium pit production at the Savannah River Site in South Carolina—the No Action Alternative in the Draft EIS. In addition, I believe the NNSA must complete a new Programmatic EIS before it can prepare a site-specific Environmental Impact Statement. The PEIS must fully analyze the reuse of the 15,000+ plutonium pits in storage at Pantex before it embarks on a dangerous, multi-billion dollar plan to build an unnecessary new bomb plant.

Reusing the 15,000 plutonium pits from retired weapons instead of building new ones would save huge sums of taxpayer money, and with 4000 nuclear weapons in the U.S. stockpile, there is no need to construct new ones. This money could be better used to address many of the problems raised by the COVID-19 pandemic, including improved healthcare, infrastructure deficits, and preparation for future pandemics.

Sincerely,

Margaret Cowan
143 E. Harper St.
Maryville, TN 37804

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

From: Bert Crain <bertcrain@yahoo.com>
Sent: Tuesday, June 2, 2020 8:21 AM
To: NEPA-SRS <NEPA-SRS@srs.gov>; Lewis Patrie <patrie.wncpsr@main.nc.us>
Subject: [EXTERNAL] Re: Proposed Pu Pits at SRS

Well said Lewi
Bert

On Monday, June 1, 2020, 07:27:37 PM EDT, Lewis Patrie <patrie.wncpsr@main.nc.us> wrote:

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,

I write you in opposition to the proposed Plutonium Pit Production Factory at the Savannah River Site (SRS, as the U. S. is awash in is existing nuclear weapons. Should a small fraction of them detonate it would likely end human life due to a nuclear winter. Creating more nuclear weapons adds to the danger. 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! Considering the effects of current coronavirus pandemic, we must work globally to control the dangers of which we are aware, we must not add to our existing woes. not add to ones already existent. May we join together for a positive future together with no nuclear weapons, and not add to radioactive pollution and waste, and reduce 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.

1/4-g
2/2-g
3/6-1.1

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.

4/2-g

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.

Sincerely

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

6/4-e

From: Lori Donath <donathl@carcosa.net>
Sent: Tuesday, June 2, 2020 10:48 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] SRS Pit Production EIS Comment

Ms. Jennifer Nelson

NEPA Document Manager

National Nuclear Security Administration

Savannah River Field Office

P.O. Box A

Aiken, SC 29802

June 2, 2020

Dear Ms. Nelson:

I am writing to urge all involved in the decision-making process to respectfully reconsider.

There is a need for a Programmatic Environmental Impact Statement (PEIS) to review all options across the U.S. Department of Energy complex, concerning plutonium pit production for nuclear weapons, including the option to not construct new facilities to produce pits at Savannah River Site (SRS) *for the first time*, and for expanded plutonium pit production at Los Alamos National Lab.

A bait and switch has been played on the American people. \$7 billion in hard-earned U.S. taxpayer money was wasted on the now abandoned MOX FFF (Mixed plutonium-uranium Oxide Fuel Fabrication Facility) at SRS. DOE and NNSA said one thing, and are now doing the opposite. The irony and hypocrisy is extreme, first claiming to be turning "Swords into

1/4-f

2/2-h

Plowshares," in converting weapons-grade plutonium excess to military needs, into "Atoms for Peace" nuclear fuel for commercial electricity reactors, as a supposed non-proliferation program. But from the very beginning, anti-nuclear power critics of the MOX FFF scheme called instead for immobilization -- mixing the weapons-grade plutonium back into the high-level radioactive waste (HLRW) from which it came in the first place, and then treating the forever deadly HLRW re-mixed with weapons-grade plutonium as just that, to be ultimately disposed of at a deep geologic repository found suitable for such after having passed a long list of stringent legal, technical, and social acceptance criteria. So what is this current nuclear weapons plutonium pit production plan? Plowshares into Swords? Swords into Swords? The icing on the cake of irony and hypocrisy is the use of the MOX FFF facility itself for nuclear weapons plutonium pit production, for the first time ever at SRS. Swords into Plowshares transformed into Swords into Swords. The mendacity is on full display for all the world to see.

2/2-h
(Cont'd)

The added environmental justice (EJ) burden of expanded plutonium pit production for nuclear weaponry at LANL is unacceptable. The map entitled "Water, Air, and Land: A Sacred Trust," by Deborah Reade, shows the very large number of nuclear, fossil fuel, and other hazardous industries and activities that have long harmed New Mexico (a state with a large percentage of Native American and Hispanic residents, and also a state that suffers near the very bottom of many socio-economic indicators regarding income, health care, education, etc.), and still do so. I have attached this map to this email as an addendum to our public comments. The safety, health, and environmental risks associated with expanded plutonium pit production for nuclear weapons at Los Alamos National Lab are an unacceptable EJ burden, especially for the Pueblo Indian nations whose land LANL occupies, but also for the rest of the state of New Mexico downwind, downstream, up the food chain, and down the generations, including its large Hispanic population.

3/3-f

Another aspect of this unacceptable scheme that must be addressed in a PEIS is its harm and risk to our national security. Beginning with a 2007 *Wall Street Journal* op-ed, the "Four Horsemen of the Nuclear Apocalypse" -- former Secretaries of State Henry Kissinger and George Schultz, former Defense Secretary William Perry, and former U.S. Senator Sam Nunn -- warned about the existential threat to the U.S. from nuclear weapons in the hands of enemies and even terrorist groups. They have since repeatedly called for abolition of nuclear weapons worldwide, as an essential safeguard of U.S. national security. If even "nuclear hawks" like Kissinger and Schultz fear the existential threat to the U.S. from the continued existence of nuclear weapons, DOE/NNSA and U.S. government policy makers at the highest levels should take heed, before it is too late. This plutonium pit production expansion plan at LANL, and the commencement of such at SRS, flies in the face of such dire warnings.

4/2-c

The example set and message sent by this plutonium pit production expansion scheme at LANL, and its commencement at SRS, increases the risk of nuclear weapons proliferation worldwide. This represents an increasing risk of actual nuclear warfare taking place, which could prove omnicidal.

There is increased environmental risk to LANL's environs out to a great distance, not just from routine operations, but also from the potential for a catastrophic release of ultra-hazardous plutonium onto the winds and waters.

As mentioned above, there is high risk -- actually a guarantee -- of violating EJ principles.

5/8-e

Under standard National Environmental Policy Act (NEPA) parlance, these are LARGE impacts. They should be treated as such in a comprehensive PEIS, not given short shrift by a slapdash, shallow, half-baked Supplemental Analysis.

And what about the Treaty on the Prohibition of Nuclear Weapons, also known as the Nuclear Weapon Ban Treaty? 36 state parties have already ratified it in less than three years. There are already a total of 81 state party signatories as well. If just 14 more state party signatories ratify this treaty, it will enter into the force of international law. The United States, and other countries possessing nuclear weapons, will be rogue nations, violating international law. This plutonium pit production program at LANL and SRS would be yet another violation of that impending treaty. In that sense, the plutonium pit production plan undermines our standing in the world.

6/2-a

And what about the 50-year old Nuclear Non-proliferation Treaty, the NPT. As posted online here <<https://www.un.org/en/conf/npt/2005/npttreaty.html>>, Article VI of the NPT states:

Article VI

Each of the Parties to the Treaty undertakes to pursue negotiations in good faith on effective measures relating to cessation of the nuclear arms race at an early date and to nuclear disarmament, and on a treaty on general and complete disarmament under strict and effective international control.

The LANL/SRS plutonium pit production expansion/commencement scheme flies in the face of the U.S.'s 50-year old NPT Article VI commitments. As a signatory of the NPT, the U.S. would again compound its violation of this treaty -- binding international law -- by pursuing this plutonium pit production expansion plan at LANL. And as the U.S. Constitution states, treaties are the highest law of the land, equal in stature to the U.S Constitution itself.

6/2-a
(Cont'd)

The Energy Secretary, and the NNSA Administrator, have sworn an Oath of Office that states:

I do solemnly swear (or affirm) that I will support and defend the Constitution of the United States against all enemies, foreign and domestic; that I will bear true faith and allegiance to the same; that I take this obligation freely, without any mental reservation or purpose of evasion; and that I will well and faithfully discharge the duties of the office on which I am about to enter: So help me God.

Since treaties are the highest law of the land, equal in stature to the U.S. Constitution itself, this means that the NPT commitments of the U.S. must be met. Plutonium pit production expansion at LANL, and its commencement at SRS, flies in the face of that.

The drafted plan simply is not supportable.

Respectfully yours,

Lori Donath

Columbia, SC 29205

From: JL Dunkelberger <jldunkelberger@gmail.com>
Sent: Tuesday, June 2, 2020 11:48 AM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] Comment in Opposition to Plutonium Pit Production Proposed for SRS in the Draft EIS

June 2, 2020

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,

As I'm sure you are aware, the proposed Plutonium Pit Production Factory planned for the Savannah River Site (SRS) is dangerous and unnecessary. Plutonium is dangerous; its production, storage, disposal and ownership all wreak havoc. The Cold War ended long ago yet the horrors from radioactive waste continue to grow.

1/5-a

Let's strive to work cooperatively as a global community for a positive future with NO nuclear weapons, NO more radioactive pollution and waste. We need to instead develop viable mediation options to prevent escalation of disagreements into the threat of war.

Others have pointed out that the National Environmental Policy Act (NEPA) requires analysis of ALL IMPACTS of a proposed action in an Environmental Impact Statement (EIS). That includes:

- analyzing the impacts on the world of the end product, a nuclear weapon (which is wholesale environmental destruction);

2/4-g

- analyzing the impacts, including costs, on national security of a nuclear arms race;

3/2-g

- analyzing the impacts of trying to prevent insider sabotage and malevolent acts.

4/6-1.1

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)

The idea of converting SRS from a plutonium clean-up site into manufacturing nuclear warhead triggers has been rejected three times. It is long past time for a new strategy. I leave it to others to detail what that should be - it should employ local people and protect the low country environment while aiding global security. I urge NNSA/DOE to provide the necessary leadership to get this type of option funded by including it in the EIS.

5/4-e

Respectfully submitted,

J Dunkelberger
Arlington, Virginia



From: THE BIG APPLE Columbia, SC <bigappledance@gmail.com>
Sent: Tuesday, June 2, 2020 2:39 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] Draft SRS Pit Production EIS Comment

THE BIG APPLE Columbia, SC <bigappledance@gmail.com>
to me

7:00 PM (6/2)

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

Subject line: Draft SRS Pit Production EIS Comment

Dear Ms. Nelson:

I hereby submit the following comments on the Draft Environmental Impact Statement for Plutonium Pit Production at the Savannah River Site in South Carolina 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 and which will pose a serious challenge. With the disastrous outcome of pit production at the contaminated Rocky Flats Plant in mind, 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. As the waste figures in the draft EIS relies on old information from earlier documents not related to pit production at SRS, please provide new calculations based on pit production in the terminated MOX plant.

1/1-h

2/6-j.6

<p>Pit production could distract from the main mission of the site and the largest amount of funding - cleaning up tens of millions of gallons of high-level nuclear waste left over from production of plutonium and nuclear weapons materials. Please discuss impacts to the SRS clean-up budget and to the overall budget of DOE's Office of Environmental Management. Discuss impacts of a plutonium fire, as took place at Rocky Flats, on the environment, front-line workers and downwind communities, many of which are comprised of minorities, such as the Barnwell, SC area and Shell Bluff, Georgia (directly across the Savannah River from SRS). Discuss impacts of a nuclear accident at the pit plant on the operation of commercial nuclear reactors at Plant Vogtle, across the river in Georgia. Discuss impacts to the pit site and the SRS support infrastructure of climate change causing localized increases in tornadoes, hurricanes and other extreme weather events.</p>	<p>3/6-j.8</p> <p>4/6-i.2 5/6-l.2 6/6-l.3</p> <p>7/6-d.1 8/6-l.4</p>
<p>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. Please discuss the threat of a new nuclear arms race.</p>	<p>9/2-g</p>
<p>Please discuss how producing pits for 80 or more nuclear weapons per year - at SRS and Los Alamos - until all pits are replaced in all nuclear weapons complies with the legal requirements in the Nuclear Non-Proliferation Treaty "to pursue negotiations in good faith on effective measures relating to cessation of the nuclear arms race at an early date and to nuclear disarmament, and on a treaty on general and complete disarmament under strict and effective international control."</p>	<p>10/2-b</p>
<p>Discuss exactly what new-design weapons pits would be for must be discussed, including the W87-1-like and W93 warheads. Under what circumstances would new-design weapons and new pits be subjected to underground nuclear testing?</p>	<p>11/2-d</p>
<p>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 and refurbishment be thoroughly analyzed before new pit production is considered. Discuss pit reuse in detail.</p>	<p>12/3-a</p>
<p>The discussion about the exact technology to be used to purify plutonium at SRS is lacking, as are the environmental and health impacts associated with this.</p>	<p>13/6-p.1</p>
<p>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 or a policy</p>	<p>14/6-j.2</p>

change? Please affirm that no more plutonium will be shipped to South Carolina as long as existing plutonium remains stored at the site.

14/6-j.2
(Cont'd)

Before "repurposing" is considered of the ill-constructed MOX plant, on which \$8 billion was wasted, there must be investigations into potential waste, fraud, abuse and mismanagement with the MOX debacle. Please provide evidence that such investigations are taking place and that the many MOX plant construction problems will be publicly identified.

15/8-d

The impact of pit production on the legally mandated cap on the volume of the Waste Isolation Pilot Plant (WIPP) in New Mexico to receive transuranic (plutonium) waste must be reviewed, along with the scheduling and volume impact of receipt of TRU waste from both the pit facility and other DOE sites.

16/6-o.1

Details of the role of the Y1-2 National Security Complex in providing HEU or other support for pit production must be fully discussed.

17/6-p.2

I support preparation of an over-arching, legally mandated Programmatic Environmental Impact Statement (PEIS) which would examine the need for expanded pit production and the role in program support, pit design, pit production and waste handling at DOE sites across the country, including SRS, Los Alamos, Pantex, Y-12, the Waste Isolation Pilot Plant, Sandia, the Nevada Nuclear Security Site, and

18/4-f

the Kansas City National Security Campus (which supplies non-nuclear components for all nuclear warheads). The PEIS must be completed before the final EIS on SRS pit production or the Supplement Analysis on pit production at Los Alamos are finalized. NNSA's plans for SRS and Los Alamos are inextricably linked and those plans must should be reviewed in a single document, the legally required PEIS

In conclusion, I support the "no action alternative" whereby the poorly constructed MOX facility would not be converted to plutonium pit production and that this alternative not be linked to pit production at Los Alamos.

19/5-a

Thank you for considering my comments and for responding to them. Please confirm receipt of these comments.

Richard Durlach
2123 Santee Avenue
Columbia, SC 29201

From: Charles Goldman <charles.goldman@yahoo.com>
Sent: Sunday, May 31, 2020 10:33 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] Draft SRS Pit Production EIS Comment

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

Dear Ms. Nelson:

I hereby submit the following comments on the Draft Environmental Impact Statement for Plutonium Pit Production at the Savannah River Site in South Carolina and ask that they be made part of the official record.

I am very concerned about the proposal to expand the role of the Savannah River Site into the production of plutonium pits. It is unacceptable that dumping of low-level nuclear waste in unlined trenches at SRS is being considered. As the waste figures in the draft EIS rely on old information from earlier documents not related to pit production at SRS, please provide new calculations based on pit production in the terminated MOX plant.

1/5-a

2/6-j.6

Pit production could distract from the main mission of the site and the largest amount of funding - cleaning up tens of millions of gallons of high-level nuclear waste left over from production of plutonium and nuclear weapons materials. Please discuss impacts to the SRS clean-up budget and to the overall budget of DOE's Office of Environmental Management.

3/6-j.8

Before "repurposing" is considered of the ill-constructed MOX plant, on which \$8 billion was wasted, there must be investigations into potential waste, fraud, abuse and mismanagement with the MOX debacle. Please provide evidence that such investigations are taking place and that the many MOX plant construction problems will be publicly identified.

4/8-d

I support preparation of an over-arching, legally mandated Programmatic Environmental Impact Statement (PEIS) which would examine the need for expanded pit production and the role in program support, pit design, pit production and waste handling at DOE sites across the country, including SRS, Los Alamos, Pantex, Y-12, the Waste Isolation Pilot Plant, Sandia, the Nevada Nuclear Security Site, and the Kansas City National Security Campus (which supplies non-nuclear components for all nuclear warheads). The PEIS must be completed before the final EIS on SRS pit production or the Supplement Analysis on pit production at Los Alamos are finalized. NNSA's plans for SRS and Los Alamos are linked and those plans must should be reviewed in a single document, the legally required PEIS.

5/4-f

In conclusion, I support the “no action alternative” whereby the poorly constructed MOX facility would not be converted to plutonium pit production and that this alternative not be linked to pit production at Los Alamos.

6/5-a

Thank you for considering my comments and for responding to them. Please confirm receipt of these comments.

Charles Goldman, MD
3021 Monroe Street
Columbia, SC 29205

From: Gwinn Graham <HollyGG@msn.com>
Sent: Saturday, May 30, 2020 3:02 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] No Plutonium Pit!

Dear Ms. Nelson:

I am writing to oppose plutonium pit production at the Savannah River Site in South Carolina—the No Action Alternative in the Draft EIS. In addition, I believe the NNSA must complete a new Programmatic EIS before it can prepare a site-specific Environmental Impact Statement. The PEIS must fully analyze the reuse of the 15,000+ plutonium pits in storage at Pantex before it embarks on a dangerous, multi-billion dollar plan to build an unnecessary new bomb plant.

The whole world has too many nuclear waste pits, and too many bomb plants as well. Please, end the tyranny of nuclear annihilation and let's begin to civilize our ways of being in the world, rather than this continuation of mutually assured destruction.

Sincerely,

Holly Graham

Olympia WA

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

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

From: Carol Green <cergreen@icloud.com>

Sent: Tuesday, June 2, 2020 10:52 PM

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

Subject: [EXTERNAL] STOP Plutonium pits for nukes

Dear Ms Nelson,

You are in an awesome position to make an awesome decision regarding the next step in additional nuclear bomb productions in the United States of America.

As a citizen of the U.S.A, I am grateful that our government allows for COMMENT PERIODS. Whether our comments sway the decision making process I can only hope.

As a citizen living near Ground Zero (the Y-12 bomb plant in Oak Ridge, Tennessee), I have been speaking up at nearly all the hearings in the past 20 years.

Now our attention is focused on the plutonium pit production at the Savannah River Site in South Carolina. This is the No Action Alternative in the Draft Environmental Impact Statement. You know that the NNSA has yet to complete a corrected, new Programmatic EIS before it can prepare the site-specific EIS.

1/4-f

Since there are more than 15,000 plutonium pits from retired warheads in storage at the Pantex Plant in Amarillo, TX, why not reuse them - if really needed - and save billions of taxpayers' dollars?

2/1-b
3/1-c

For that matter, the stockpile of at least 4,000 warheads are certified reliable for the next 50 years, so there is no need to make more.

In 1993 Congress forbade the making of NEW nuclear warheads. They are NOT needed and they defy the international efforts to move towards a nuclear weapons free world.

4/2-a

Please remind the decision makers, including Senator Lindsay Graham, that taxpayer dollars are supposed to go for jobs to clean up the wastes from ongoing and legacy operations. There is a coronavirus pandemic causing a health care and economic collapse crisis. Choose to help South Carolina, not add to the devastation by adding to the radioactive waste streams.

5/5-a

NO NEW PLUTONIUM BOMB PLANT SHOULD BE BUILT AT SAVANNAH RIVER. Period.

Sincerely,

Carol Green
804 Shannondale Way #201

Maryville TN 37803

From: MacBryan Green <[REDACTED]>
Sent: Friday, May 29, 2020 6:59 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] Plutonium Pit Production (SRS Pit Production EIS) (DOE/EIS-0541)

WITHHOLD ALL PERSONAL INFORMATION EXCEPT MY NAME FROM THE PUBLIC RECORD.

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

Dear Ms. Nelson,

I have read your notice in the Federal Register at <https://www.federalregister.gov/documents/2020/04/03/2020-06557/notice-of-availability-of-draft-environmental-impact-statement-for-plutonium-pit-production-at-the>

My purpose in writing is to OPPOSE the Project. There are several parallel reasons for my opposition.

(1) When I was born, there was a relatively small amount of man-made radioactive material on the surface of the Earth. The hydrogen bomb had not yet been tested. **My generation has ruthlessly increased** the quantity of dangerous radioactive material on Earth, without providing younger generations with any good plan or compensation or reparation for dumping the consequences on them. To now produce fresh nuclear material, especially for bombs, is **VILE** in the extreme.

1/6-p.3

(2) All new investment in the Savannah River site & locale should go for CLEANUP of the messes already made. No activity at that site should be allowed to add to the current level of non-natural substances, at that site OR at any site from which materials for the Plutonium Pit Production might be obtained.

2/6-j.8
3/5-a

(3) The USA already possesses more DESTRUCTIVE POWER than all other nations on Earth combined. If the USA does not feel secure with that dominant position, it is not because of Reality, but of paranoia. There is NO REALISTIC NEED whatsoever for fresh bomb production, for production of new material to 'refresh' existing old bombs, etc.

4/1-b

(4) The USA INVITES resentment and aggression with its nuclear bomb production projects. The making of, and possession of, large numbers of nuclear bombs, makes the USA LESS safe. **The people who advocate investment in the nuclear stockpile are interested in profit and power**, NOT the long-term safety of North America's forests, meadows, fish & wildlife, creeks & lakes, livestock, and people.

5/2-c

(5) The principle which guides my life is: "Win or loose, NEVER be the agent of injustice." I would rather die than inflict a nuclear explosion on Mother Earth. Anyone willing to win-by-nuclear-explosion is ethically bankrupt.

(6) I do not want my taxes used for anything related to nuclear activity except for dismantling and cleanup.

(7) The BEST defense is that used by Switzerland: "Invade me and you will get nothing but obliterated infrastructure and mountains full of competent freedom fighters." Not even Julius Caesar or Adolf Hitler messed with Helvetia.

THANK YOU for considering my position. **Please STOP the Plutonium Pit Project and ALL similar projects.**

Sincerely,

MacBryan, a resident of [REDACTED]

MacBryan Green

3/5-a
(Cont'd)

From: pamela Glaw <greenlawpk@gmail.com>
Sent: Tuesday, June 2, 2020 9:46 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Cc: Pamela Greenlaw <pamiekins@hotmail.com>; pamela Glaw <greenlawpk@gmail.com>
Subject: [EXTERNAL] Comments on the Draft EIS on the Proposed SRS Plutonium Bomb Plant

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

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

Dear Ms. Nelson:

Dear Ms. Nelson,

I hereby submit the following comments on the proposed "Savannah River Plutonium Processing Facility (SRPPF)" in order for them to be made part of the official record.

First, the entire process of communicating and involving the public has violated legal NEPA rules of community engagement. The entire process has been discriminatory and has violated the intent of NEPA regulation to involve potentially affected communities in the planning and not just as an afterthought. National Environmental Policy Act requires federal agencies to include the public in decision-making, and that did not occur in any equitable manner.

1/4-b

Second, the notice of the draft EIS was first published on April 3, 2020 without regard to extreme changes in people's lives as a result of the COVID-19 pandemic. The corresponding, standard stipulation of a 45-day public comment period was inappropriate considering these sudden life changes. None of the public dealing with day-to-day lives in turmoil could possibly have studied,

2/4-a

researched, reviewed the draft EIS and all the accompanying documents in that short time period. Even the extension for written comment ignored these facts.

2/4-a
(Cont'd)

Third, the scheduling of the virtual meeting for the public violated the principles of fair treatment protected through NEPA's primary mission and regulations. Choosing to have a virtual meeting via technologies not reliably available to rural residents by default screened out entire swaths of stakeholders. Downstream and downwind from SRS are rural and EJ communities which lack broadband availability. Cell towers and cable connections are spotty and unreliable; calls are often dropped. Such glitches online can prevent stakeholders from signing on, can cut people off, and otherwise stop intercommunication. In light of these difficulties the hearing should have been postponed until it was safe again to meet in person with a call-in line available for others. There was and is no military emergency. We are not being attacked. Attack is not eminent. Construction and commencement of the fabrication

1/4-b
(Cont'd)

will take several years. There is time to do this properly and legally.

Fourth, the draft EIS declared there would be no significant impact to the rural, environmental justice communities in the area. This shows the draft EIS is inadequate and cuts corners in addressing probable and possible impacts on the air, soil, and water, and does not adequately address probable health and economic impacts to workers and to downstream and downwind communities. This draft ignores historical and up-to-date data, including discovery of plutonium hot spots after "clean ups" at LANL and Rocky Flats. Plutonium is toxic for 140,000 years. When particles are inhaled, it is retained in the lungs, liver, bone, and bone marrow. The discussion of the exact technology to be used to purifying plutonium is lacking, as are the environmental and health impacts associated with this. These omissions alone must be addressed or they invalidate the Environmental Justice section of the draft EIS as written.

3/6-i.2
4/2-i

Fifth, the DOE/NNSA must prepare an over-arching Programmatic Environmental Impact Statement (PEIS) which would examine the need for expanded pit production and the roles of DOE sites across the country in the process of fabrication the new plutonium pits at SRS. In fact, this particular draft EIS should not have preceded the PEIS, nor should the DOE/NNSA be having this inappropriate timing for public input on an EIS. The PEIS must be completed before the EIS on SRS pit production is finalized. This is required by law.

5/4-f

Sixth, in the draft EIS S.1.2 Purpose and Need should not include national security or up-dating plutonium pits because they are aging. These ideas have nothing to do with environmental impact of a new facility for making weapons of mass destruction. These two issues are non-issues. There are between 15,000 and 20,000 plutonium pits in temporary storage at Pantex in Texas where nuclear arms are assembled and disassembled. The lifetime of existing plutonium pits is an average of 100 to 150 years, according to the JASON study at Lawrence Livermore Labs. No more pits have been made since 1991, and these plutonium pits are completely viable.

6/1-c

The true needs and purposes of the scheme to build new plutonium pits at both LANL and at SRS are based upon political power and gamesmanship and upon financial gain for inventors, contractors, political figures, and investors for creating new designs for new plutonium pits to be part of new nuclear weapons, as the newly designed pits will not fit into existing weapons systems. The US nuclear stockpile is more than sufficient to kill the world over many times. More weapons of mass destruction will not net any increase in a deterrence factor.

7/1-b

Seventh, the draft EIS does not consider the environmental risks of nuclear proliferation race.

a. This plan for the US to build more new pits per year than necessary to update nuclear weapons clearly violates the International Non-Proliferation Treaty, breaking two core pillars of the treaty: non-proliferation and disarmament, and the environmental risks of renewed nuclear weapons building here and around the world are dire and inhumane.

8/2-a
9/4-g

b. Furthermore, the United States has **not** foresworn using nuclear weapons as a first strike option.

c . Nuclear weapons of "low-yield" are being thought of by this administration not only as a strike first capability, but also as a "policy" option. The idea that such any nuclear weapon could have a limited use, there could be a limited effect. Both the proliferation and lack of sound policy will set the rest of the nuclear states into a renewed nuclear weapons building frenzy. See documentation in the Mar. 7, 2020 editions of Nuclear News.

8/2-a
9/4-g
(Cont'd)

d. Additional international treaties are being broken and/or not renewed.

For all these reasons the draft EIS must include the environmental impacts of limited nuclear war.

Eighth, I am concerned about the proposal to expand the role of the Savannah River Site which is already lagging behind on its primary task of dealing with legacy waste. The introduction of new waste streams on site resulting from the fabrication processes of plutonium pits begs the question of management of the new waste. If the legacy waste now existing on site is not being effectively managed what will be the various impacts of even more waste which has to be managed? Will it be stranded on site, will it be moved to the limited salt waste treatment in New Mexico, which does not have plans engineered and a path forward for a necessary expansion to accept new waste streams. 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? The EIS does not but should describe a clear, reasonable, and real plan for dealing with all the waste streams on the site. Without a real plan, there cannot be a valid analysis of environmental impact, all the more reason to conduct a PEIS.

5/4-f
(Cont'd)
10/6-j.8
11/6-j.5
12/6-j.2

Ninth, 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.

13/8-d

In conclusion, I support the "no action" alternative whereby the poorly constructed MOX facility would not be converted to plutonium pit production and that no plutonium pit fabrication plant is sited at all at SRS.

14/5-a

Thank you for considering my factual and studied views. I look forward to your responses to them.

Pamela Greenlaw

greenlawpk@gmail.com

803-394-5134

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

From: Janet <contactus@cardnm.org>
Sent: Saturday, May 30, 2020 10:17 AM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] comment

To whom it may concern,

We do not need more plutonium pits. We need a government who will negotiate in good faith to reduce unilaterally the number of nuclear weapons in the world.

To spend our tax money on a project that endangers our future is self defeating. The only people who will benefit from this project are the weapons manufacturers and their spin off companies.

When this life ends and you meet your maker, how will you explain to him how you used the life he gave you; how will you explain that you spent that energy making weapons of mass destruction?

Please find a way to stop this project.

Sincerely,

Janet Greenwald
Coordinator, Citizens for Alternatives
to Radioactive Dumping,
Box 485, Dixon, NM 87527

1/1-b



SOUTHWEST RESEARCH AND INFORMATION CENTER

P.O. Box 4524 Albuquerque, NM 87196 505-262-1862 FAX: 505-262-1864 www.sric.org

June 2, 2020

Ms. Jennifer Nelson
NEPA Document Manager
NNSA Savannah River Site Field Office
P.O. Box A
Aiken, SC 29802

Email to: NEPA-SRS@srs.gov

Re: Notice of Availability (NOA) 85 Federal Register 18947-48 (April 3, 2020) of Draft Environmental Impact Statement (DEIS) for Plutonium Pit Production at the Savannah River Site (SRS) in South Carolina and Announcement of Public Hearing.

Dear Ms. Nelson:

Southwest Research and Information Center (SRIC) is a private non-profit organization founded in 1971, which has a long history of involvement in National Environmental Policy Act (NEPA) proceedings and documents. The following comments are in response to the above referenced DEIS. Because of SRIC's expertise regarding the Waste Isolation Pilot Plant (WIPP), these comments primarily focus on that facility and the totally inadequate analysis of that facility and transuranic (TRU) waste storage and disposal in the DEIS. Further, we note the essentially total disregard of the comments submitted to you by SRIC on August 12, 2019. Those comments and related comments submitted on July 25, 2019 are incorporated by reference and attached.

1/4-i

1. NNSA has not complied with NEPA, which requires a new or supplemental PEIS

A supplemental or new Programmatic Environmental Impact Statement (PEIS) is required. See attached 2019 comments. Thus, the DEIS should not have been issued at this time because the required Draft PEIS has not been issued for public comment and hearings, nor is there a Final PEIS and Record of Decision.

The DEIS does not adequately address the need for a PEIS. The DEIS mentions previous NEPA documents, including the 1996 Stockpile Stewardship and Management Programmatic Environmental Impact Statement (SSM PEIS) and the 2008 Final Complex Transformation SPEIS (NNSA 2008a), "which is a supplement to the SSM PEIS." at 1-8. The DEIS summary list of scoping comments includes: "The EIS and other plutonium pit decisions must be put on hold until such time as the Complex Transformation SPEIS ROD is amended." at 1-14. "There has been new information regarding environmental justice impacts at SRS that NNSA must consider in a new supplemental programmatic EIS. There

2/4-f

is a need for a more robust Environmental Justice analysis with support from Environmental Justice experts, especially cumulative impacts to Environmental Justice in a new programmatic EIS.” at 1-15. Those brief mentions do not adequately summarize the scoping comments of SRIC and others. Importantly, the DEIS fails to discuss the PEIS issue, nor provide any legal and technical analysis of how the previous PEISs are adequate to support the current proposed action, for which the reuse of the MOX Facility and its impacts is not specifically discussed in either of those earlier documents.

2/4-f
(Cont'd)

A further important technical and legal assessment of the need for a PEIS is the issuance on April 30, 2020 of the National Academies of Sciences, Engineering, and Medicine *Review of the Department of Energy's Plans for Disposal of Surplus Plutonium in the Waste Isolation Pilot Plant*. (NAS Report).¹ The NAS Report states:

RECOMMENDATION 5-5: The Department of Energy should implement a new comprehensive programmatic environmental impact statement (PEIS) to consider fully the environmental impacts of the total diluted surplus plutonium transuranic waste inventory (up to an additional 48.2 metric tons) targeted for dilution at the Savannah River Site and disposal at the Waste Isolation Pilot Plant (WIPP). Given the scale and character of the diluted surplus plutonium inventory, the effect it has on redefining the character of WIPP, the involvement of several facilities at several sites to prepare the plutonium for dilution, a schedule of decades requiring sustained support, and the environmental and programmatic significance of the changes therein, a PEIS for the whole of surplus plutonium that considers all affected sites as a system is appropriate to address the intent and direction of the National Environmental Policy Act and would better support the need for public acceptance and stakeholder engagement by affording all the opportunity to contemplate the full picture.

3/8-c
2/4-f
(Cont'd)

Thus, in addition to SRIC, many other organizations and individuals have commented on the need for a new or supplemental PEIS. And the further support for a PEIS by the National Academies should result in a draft PEIS for public comment and hearings and a Final PEIS and Record of Decision. Until those documents and proceedings happen, NNSA should not proceed further with this SRS Plutonium Pit Production EIS process.

2. The DEIS is legally and technically inadequate in its consideration of WIPP as the only disposal location for all of the TRU waste generated by new plutonium pit production.

A. WIPP's mission does not include TRU waste from new plutonium pit production from 2030 to some unknown future date or in perpetuity.

The long history regarding WIPP's mission and the requirement for additional repositories was addressed in the attached comments from 2019. The DEIS does not adequately discuss this issue and is therefore grossly inadequate.

4/6-j.5

¹ National Academies of Sciences, Engineering, and Medicine 2020. *Review of the Department of Energy's Plans for Disposal of Surplus Plutonium in the Waste Isolation Pilot Plant*. Washington, DC: The National Academies Press. <https://doi.org/10.17226/25593>.

In addition, the NAS Report also states:

Beyond the technical considerations and analyses, there is a “social contract” perspective that may be equally important to the long-term public support and sustainability of the dilute and dispose program objectives. The common presentation of WIPP TRU waste as modestly contaminated debris generated through defense activities related to nuclear weapons maintenance and development is incongruent with the characteristics of the DSP-TRU waste streams. Indeed, the DSP-TRU waste streams (SRS-KACPuOx, SR-KAC-PuOx-1, and SRS-KAC-SPD) could be viewed as closer to conditioned nuclear material than traditional TRU waste. at 96.

The National Academies further recommended:

RECOMMENDATION 5-2 (updated Interim Report RECOMMENDATION 2):
The Department of Energy’s National Nuclear Security Administration and Office of Environmental Management should engage New Mexico and South Carolina as well as their congressional delegations prior to the public engagement required by the National Environmental Policy Act process to assess prospects for successfully amending the existing legal agreements to allow for the dilution and packaging of up to 48.2 metric tons of surplus plutonium at the Savannah River Site and its disposal in the Waste Isolation Pilot Plant.

NNSA should acknowledge that major technical difference between the TRU waste being proposed for new pit production and the historic fact that such plutonium was not originally included in WIPP’s mission. Further, NNSA should begin now the engagement with New Mexico and South Carolina recommended by the National Academies.

Additionally, DOE, including NNSA and EM, should begin the process of considering new repositories and include that reasonable alternative and its impacts in the new or supplemental PEIS.

B. State of New Mexico agreements and requirements do not include new pit production waste disposal at WIPP.

The requirements of the Consultation and Cooperation (C&C) Agreement and the WIPP Permit were discussed in the 2019 SRIC comments that are attached. The DEIS does not even mention the C&C Agreement, and is, thus, totally inadequate as to that fact and violations of, and enforceability of that Agreement. The DEIS briefly mentions the WIPP permit and some of its requirements (at 3-53, 3-54, 4-41, 4-95, and 5-11), but does not address the fact that pit production TRU waste is not included in those agreements. The DEIS does not mention or address the “social contract” aspect of those agreements, which the SRS plutonium pit production waste would violate.

The DEIS does acknowledge that “WIPP was originally planned for an operational life of 25 years, followed by closure and postclosure phases.” at 3-54. It does not discuss the fact that timeframe is included in the WIPP Permit, and that the State of New Mexico can require WIPP’s closure well before the end of the 50-year lifetime of pit production proposed at SRS.

4/6-j.5
(Cont’d)

Here again, the new or supplemental PEIS and any SRS EIS must include and fully consider that possibility of WIPP’s closure to provide adequate environmental analysis. The less-than-50-year WIPP timeframe must also result in consideration of other alternatives than WIPP for TRU waste storage and disposal from the SRS pit production.

5/6-j.12

C. WIPP does not have capacity for the amount of TRU waste generated by new pit production.

The DEIS states: “As shown in Table 5-4, the available capacity of WIPP would accommodate the conservatively estimated TRU waste that could be generated over the next 50 years.” at 5-12. However, the DEIS does not address SRIC’s 2019 comments that are attached regarding the fact that those capacity efforts are not “bounding” or “conservative” outer container volumes are used, as in the WIPP permit and historical practice. Indeed, the cited reference - <https://www.wipp.energy.gov/general/GenerateWippStatusReport.pdf> - shows that as of May 23, 2020, that TRU waste volume is 97,858,46 cubic meters. Using that volume, and using outer container volume to calculate the SRS pit production waste, would result in WIPP’s legal capacity being exceeded by about 50 percent.

The NAS Report shows those calculated results and that the DEIS does not conservatively estimate TRU waste volumes:



6/6-o.1
7/6-j.16

FIGURE S-5 DOE-reported emplaced and future transuranic wastes estimates (DOE-CBFO, 2018a, 2019a) and additional wastes, identified by the committee. Additional wastes are: DSP-TRU, Greater-than-Class-C-like (GTCC-like) TRU wastes, tank wastes, and TRU waste generated from pit production. The graphs illustrate the impact of the Volume of Record (VoR) recalculation, in particular the large reduction in DSP-TRU waste volumes. Both graphs also show that the Land Withdrawal Act statutory limit is likely to be exceeded. DSP-TRU volumes have been subtracted from TRU waste estimates. See Table 3-2. at 6.

As shown in that figure, if the existing defense TRU waste planned for WIPP is actually emplaced, essentially all of the pit production waste would be excluded from WIPP because it is more than the legal capacity. An adequate PEIS or SRS EIS must acknowledge that truly conservative estimates of the WIPP legal capacity limit would not accommodate any, and certainly not all, of TRU waste generated by new pit production. Such documents must analyze the impacts of adhering to that limit, as well as the impacts of changing that legal limit, including violating the “social contract” with New Mexico. Such documents must also consider the reasonable alternative sites for storage and dispose of TRU waste from pit production.

6/6-o.1
7/6-j.16
(Cont’d)
2/4-f
(Cont’d)

3. The DEIS is legally and technically inadequate because it does not discuss the environmental impacts of long-term storage of all the TRU waste from pit production at SRS.

As stated in the attached SRIC 2019 comments that are further supported by the above discussion, because WIPP does not have capacity for all of the waste generated by new pit production, SRS must have capacity for safe and legally compliant storage of all of the waste produced throughout the duration of pit production. The DEIS does not include any discussion of the environmental impacts of such long-term storage.

Instead, the DEIS states:

A recent curtailment of WIPP activities lasted for longer than one year and could happen again, if necessary, to ensure safe operations at that site. However, planning internal storage capacity to accommodate more than one year of waste generation is deemed a sufficient contingency. at 4-40.

6/6-o.1
(Cont’d)

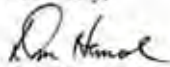
Such “planning” is not sufficient for the likely possibility that the TRU waste from pit production would not go to WIPP and there is no other long-term storage or disposal site. Thus, it is reasonable that most or all of the TRU waste would have to be stored at SRS where it would be generated. So a minimum bounding analysis of the environmental and health impacts of such a possibility must be included in an adequate PEIS and SRS EIS.

4. If NNSA proceeds with the SRS EIS process, SRIC supports the No Action Alternative of not proceeding with the SRS Plutonium Pit Facility and leaving the partially constructed MOX Fuel Facility unused.

8/5-a
9/6-j.9

Thank you for your careful consideration and response to these comments and all others are that being submitted.

Sincerely,



Don Hancock

Email: srcidon@earthlink.net



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August 12, 2019

Ms. Jennifer Nelson
NEPA Document Manager
NNSA Savannah River Site Field Office
P.O. Box A
Aiken, SC 29802 [Email to: NEPA-SRS@srs.gov](mailto:NEPA-SRS@srs.gov)

Re: Notice of Availability (NOA) 84 Federal Register 31055-56 (June 28, 2019) Draft Supplement Analysis (SA) of the Complex Transformation Supplemental Programmatic Environmental Impact Statement, DOE/EIS-0236-S4-SA-02, June 2019

Dear Ms. Nelson:

Southwest Research and Information Center (SRIC) is a private non-profit organization founded in 1971, which has a long history of involvement in National Environmental Policy Act (NEPA) proceedings and documents. The following comments are in response to the above referenced Draft Supplement Analysis (SA). Because of SRIC's expertise regarding the Waste Isolation Pilot Plant (WIPP), these comments primarily focus on that facility and the totally inadequate analysis of that facility and transuranic (TRU) waste disposal in the Draft SA.

Rather than reiterate related comments submitted on July 25, 2019 regarding *Notice of Intent (NOI) To Prepare an Environmental Impact Statement for Plutonium Pit Production at the Savannah River Site*, those comments are incorporated by reference and attached.

1. NNSA has not complied with NEPA, which requires a PEIS

A supplemental or new Programmatic Environmental Impact Statement (PEIS) is required. See attached July 25, 2019 comments. Thus, any adequate SA must conclude that such a PEIS is required before any further action is taken.

To the contrary, the Draft SA states: "The Draft SA preliminarily concludes that further NEPA documentation at a programmatic level is not required." Executive Summary, second page (unnumbered). "I have preliminarily determined that no further NEPA documentation is required at a programmatic level, and NNSA may amend the existing Complex Transformation SPEIS ROD." Page 48. Thus, the factual information and analysis in the Draft SA is clearly deficient and erroneous.

2. WIPP is not the disposal location for TRU waste from new plutonium pit production

A. WIPP's mission does not include TRU waste from new plutonium pit production from 2030 to some unknown future date or in perpetuity.

WIPP was initially authorized in Section 213 of Public Law 96-164 (December 29, 1979). That fact is not included in the Draft SA. That law authorized WIPP "for the express purpose of providing a research and development facility to demonstrate the safe disposal of radioactive waste resulting from the defense activities and programs of the United States exempted from regulation by the Nuclear Regulatory Commission." § 213(a).

Thus, since 1979, Congress, the State of New Mexico, and the public have understood that WIPP has a limited mission and that other nuclear waste disposal sites would be created. That fact is not included in the Draft SA. In 1982, Congress passed the Nuclear Waste Policy Act (Public Law 97-425) that required development of other nuclear waste repositories. That fact is not included in the Draft SA.

In 1992, Congress passed the WIPP Land Withdrawal Act (Public Law 102-579). That fact is mentioned in the Draft SA. Page 46. The law limited WIPP's capacity to up to 6.2 million cubic feet (175,564 cubic meters) of TRU waste. § 7(a)(3). Again, Congress explicitly recognized that WIPP had a limited mission, and implicitly reiterated that additional TRU waste disposal facilities would be needed for future pit production. That WIPP wouldn't handle all of the TRU waste was emphasized in the final House floor debate by one of the bill's co-sponsors, Rep. Peter Kostmayer:

"Whether we are going to generate more nuclear waste is not the question. The question is we have got to get rid of the material we have. This facility will take only 20 percent of all the waste that we have. Still 80 percent will remain unburied. We have to deal with that." *102 Congressional Record* 32552 (c. 2)(October 5, 1992).

Additionally, each of the four committees that considered the WIPP Land Withdrawal Act recognized that WIPP also had a limited, 25-year operating lifetime. Senate Energy Committee (S. Rpt. 102-196, p. 18); House Interior Committee (H. Rept. 102-241, Part 1, p. 9); House Armed Services Committee (H. Rept. 102-241, Part 2, p. 13); House Energy Committee (H. Rept. 102-241, Part 3, p. 41).

Since the Rocky Flats Plant had been closed in 1989, Congress was well aware in 1992 that WIPP was not for future major pit production, if such a replacement facility was developed. DOE is now proposing such a new facility or facilities by 2030, so new TRU waste disposal facility(ies) must also be included in such a proposal.

B. State of New Mexico agreements and requirements do not include new pit production disposal at WIPP.

1. Consultation and Cooperation (C&C) Agreement. The 1979 Authorization also included provisions: (1) requiring the Department of Energy (DOE) Secretary to “consult and cooperate with the appropriate officials of the State of New Mexico, with respect to the public health and safety concerns of such State in regard to such project....” § 213(b)(1); and (2) “seek to enter into a written agreement with the appropriate officials of the State of New Mexico, not later than September 30, 1980....” § 213(b)(2). Those facts are not included in the Draft SA.

No C&C Agreement was signed by September 30, 1980. In 1981, the State of New Mexico sued the DOE regarding WIPP in Federal District Court in New Mexico. Case Civil Action No. 81-0363 JB. On July 1, 1981, after discussions, the State Attorney General and U.S. Attorney filed a Joint Motion to Stay All Proceedings, which was approved that day by the Court along with a stipulated agreement. As part of the Stipulated Agreement, the Governor of New Mexico and DOE Secretary signed a C&C Agreement. That Agreement has been modified in 1984 and 1987. The Agreement includes a 6.2 million cubic feet capacity limit and does not include provisions to keep WIPP open in perpetuity or to allow TRU waste from future pit production.

https://wipp.energy.gov/library/Information_Repository_A/Supplemental_Information/Consultation%20and%20Cooperation%20Agreement.pdf

While the C&C Agreement might be modified again regarding TRU waste from new pit production, such a modification has not occurred. So any adequate SA or PEIS must consider other disposal site alternatives, which the Draft SA does not do.

2. WIPP Permit. The New Mexico Environment Department (NMED) issued a Permit for WIPP in 1999. The Permit was renewed in 2010 and currently expires in December 2020.

https://wipp.energy.gov/Library/Information_Repository_A/Searchable_Permit_NMED_Approved_August_2019_AR.pdf

The Permit has always specifically stated that the Disposal Phase “extends until 2024.” Permit Attachment G-1d(2). And in numerous other provisions, the Permit states that the Disposal Phase is 25 years. Since the Disposal Phase began on March 26, 1999, the Disposal Phase is until 2024. If WIPP receives no TRU waste after 2024, it cannot handle waste generated by new pit production starting in 2030. Thus, the Permit does not allow TRU waste from new pit production.

While the Permit can be modified, it has not been modified to allow its operation after 2024. So any adequate SA or PEIS must consider other disposal site alternatives, which the Draft SA does not do.

C. WIPP does not have capacity for the amount of TRU waste generated by pit production.

1. Legal capacity. The Draft SA, pages 6, 24, 45, and 46 acknowledges the capacity limit is included in previous NEPA documents. The SA does not state that limit comes from the C&C Agreement and the WIPP Land Withdrawal Act.

The Draft SA emphasizes that the capacity limit was increased by the Permit Modification approved in December 2018. Pages 45-46. The Draft SA does not mention that decision is being challenged legally in the New Mexico Court of Appeals. Nor does the Draft SA mention that the revised capacity limit must again be adopted (or not) in the permit renewal process. In addition, even under the existing Permit, NMED could order closure when the permit limits are met or at some other time before 6.2 million cubic feet of waste under the new "WIPP LWA" volume is emplaced. An adequate SA or PEIS must acknowledge that the WIPP legal capacity limit may not accommodate any or all of TRU waste generated by new pit production.

2. Design/actual capacity.

The 1980 WIPP FEIS, referenced in the Draft SA, stated that the design capacity of 8 panels and panels 9 and 10, if needed, was 6.2 million cubic feet. Page 2-17.

For many years, SRIC has publicly noted that the permittees' management practices, especially failing to use all of the disposal capacity of each WIPP panel and leaving much of the remote-handled (RH) waste disposal capacity unused, meant that the actual capacity of the eight (or ten) panels is much less than 6.2 million cubic feet.

In 2003, the DOE Inspector General (IG) reported:

"If current waste emplacement practices continue, by 2020, the repository, as now configured, will not be able to accommodate 980 planned shipments of remote-handled TRU waste. The Department has recognized the potential space problem and identified some alternatives, but has not yet formally planned for the resolution of this issue."
<https://www.energy.gov/sites/prod/files/igprod/documents/CalendarYear2003/ig-0613.pdf>, page 1.

In 2013 the DOE IG reported:

"We found that while EM had made progress in meeting its operational disposal goals, it was not on track to meet its goal to dispose of 90 percent of the Department's legacy TRU waste by the end of FY 2015. In particular, EM faces a number of challenges in meeting its planned 90 percent waste disposal goal by 2015. Additionally, without further modifications to the repository or existing waste disposal practices, WIPP may not have capacity for disposal of the current RH inventory."
<https://www.energy.gov/sites/prod/files/2013/05/f1/OAS-L-13-09.pdf>, page 1-2.

In 2017, the Government Accountability Office (GAO) reported:

“DOE does not have sufficient space at WIPP to dispose of all defense TRU waste....

- DOE’s TRU waste management plan, which includes planning for WIPP, covers a 5-year period and does not address possible expansion. Moreover, DOE’s TRU waste management plan does not include a schedule for expanding DOE’s disposal space before existing space is full.

- Expanding WIPP’s disposal space will require regulatory approval that is expected to take several years. However, DOE modeling that is needed to begin the regulatory approval process is not expected to be ready until 2024.” <https://www.gao.gov/assets/690/686928.pdf>, inside cover.

Thus, it has long been known that WIPP’s actual capacity in the ten panels would not accommodate the legal capacity. That actual capacity has been further reduced by the elimination of Panel 9 by closing the southern panels 3-6 by the WIPP Permit Panel Closure modification approved in 2018 and now being implemented. Further, a significant portion of the Panel 7 capacity has been lost because of using very little of Room 7 and none of rooms 4 and 6. In addition, only Panel 2 of the first six panels was filled with the permit capacity limits. None of those facts are included in the Draft SA.

Consequently, WIPP does not have actual capacity for 6.2 million cubic feet of waste that is currently proposed, let alone the additional volumes from pit production from 2030 until some unknown future date. An adequate NEPA document must include that information and discuss the reasonable alternatives, which the Draft SA does not do.

D. EPA certification does not allow for TRU waste disposal from new pit production.

In its Certification Application and recertification applications, DOE has provided EPA with waste inventory data based on outer container volume to show compliance with the LWA capacity limit of 6.2 million cubic feet of TRU waste. These submissions, and EPA’s acceptance of the data as responsive to the Compliance Criteria requirement of data showing compliance with LWA limits (40 C.F.R. § 194.24(g)), were done pursuant to a public notice-and-comment rulemaking process and provide a controlling interpretation of the LWA limits. See, e.g., *Seneca-Cayuga Tribe of Oklahoma v. National Indian Gaming Commission*, 327 F.3d 1019, 1036-40 (10th Cir. 2003).

The Draft SA does not discuss the EPA certification requirements, nor that the waste volume limits are based on outer container volumes. An adequate NEPA document must include that the EPA certification may not allow the additional waste that DOE proposed in the Permit Modification and discuss the reasonable alternatives, which the Draft SA does not do.

3. Any adequate NEPA document must consider the impacts of long-term waste storage at the generator sites.

Since there is no designated existing or proposed disposal location for the waste generated by new pit production, both of the designated production sites – LANL and SRS – must have capacity for safe and legally compliant storage of all of the waste produced throughout the lifetime of the facilities.

The Draft SA includes some discussion about storage capabilities at SRS on pages 46-47 and at LANL on page 47. Regarding SRS, there is no discussion of the State of South Carolina’s opposition to long-term plutonium storage at SRS, including recent litigation that required removal of one metric ton of plutonium from the state. *State of South Carolina v. United States, et al, CA: 1:16-00391-JMC*. An adequate NEPA document must include information about whether the State of Carolina’s approval of long-term plutonium storage is needed and has been received, including that such storage is permitted.

At LANL, the Draft SA states that the TRU Waste Facility has a surge capacity of 1,240 drums. That capacity is totally insufficient for decades of future pit production at the site. The Draft SA also does not discuss whether the State of New Mexico would permit long-term storage at LANL, and the fact that the State has not permitted any such storage.

The Draft SA discussion is totally inadequate and does not demonstrate that there is adequate on site storage for the lifetime of pit production. Nor does it discuss any alternative long-term storage facilities.

4. NNSA has not provided all of the documentation used in the Draft SA

Section 6.0 of the Draft SA lists references. Most of the documents are publicly available and website links are included. However, the first reference listed - CBFO 2019. "WIPP Shipping Capability to Support NNSA Missions," Carlsbad Field Office, April 2019 – has no link. A google search does not find it. On July 23, 2019, SRIC requested that document be sent immediately to this organization and publicly posted online. No response was received until an August 8, 2019 email from Jennifer Nelson, NEPA Document Manager. The response was:

“The requested document is not releasable at this time but is undergoing review for public release. When the document is approved for release it will be added to the documents referenced in the Draft SA on the NNSA website. Much of the material in the reference has already been stated in the Draft SA in Section 4.3.3.”

That response is not adequate. Information used and referenced in a NEPA document must be publicly available. 40 CFR § 1502.18(d), 40 CFR § 1502.21.

The Draft SA states: "A large emphasis is placed on meeting NNSA shipping requirements to support active projects and missions related to national security and stockpile stewardship (CBFO 2019)." Page 46. No adequate basis is given for that statement, which is contrary to the facts. As discussed in Point 2.1 above, WIPP's mission is for legacy TRU waste – not current and future waste. As of August 3, 2019, about 50 percent of shipments to WIPP are from the Idaho National Lab (INL) and about 16 percent were from the Rocky Flats Plant. <https://wipp.energy.gov/shipment-information.asp>

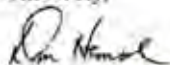
In FY 2019, more than 80 percent of shipments to WIPP are from INL. Thus, the history is contrary to the statement that there is a large emphasis on NNSA sites. In many cases, there are legal compliance agreements with states that require the legacy TRU waste to be removed from the state. The Draft SA does not discuss those compliance agreements. The Draft SA provides no adequate support for the cited statement, especially since the only cited reference document for the assertion is not available.

Moreover, the 2018 Annual Inventory Report shows that future WIPP-bound waste is primarily from INL and Hanford, WA – not NNSA sites. https://wipp.energy.gov/library/TRUwaste/DOE-TRU-18-3425_Rev_0.pdf
The amount of waste in the Inventory certainly exceeds the existing capacity of Panels 7, 8, and 10. The waste also is likely to exceed the 6.2 million cubic feet legal capacity limit, based on outer container volume.

In summary, a new or supplemental PEIS is required before further action is taken to proceed with new pit production or any decision to implement such a major federal action. Any adequate NEPA document must conclude that WIPP is not the disposal facility for TRU waste from new pit production from 2030 onward. Any adequate NEPA document must discuss all reasonable alternatives to any waste storage or disposal at WIPP, including long-term on site storage at LANL and SRS and new disposal facility(ies).

Thank you for your careful consideration and response to these comments and all others are that being submitted.

Sincerely,



Don Hancock

Email: srjcdon@earthlink.net



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July 25, 2019

Ms. Jennifer Nelson
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Aiken, SC 29802

Email to: NEPA-SRS@srs.gov

Re: Notice of Intent (NOI) To Prepare an Environmental Impact Statement for Plutonium Pit Production at the Savannah River Site. 84 Federal Register 26849-26851 (June 10, 2019)

Dear Ms. Nelson:

Southwest Research and Information Center (SRIC) is a private non-profit organization founded in 1971, which has a long history of involvement in National Environmental Policy Act (NEPA) proceedings and documents. The following comments are in response to the above referenced June 10, 2019 notice that the National Nuclear Security Administration (NNSA) will prepare a draft environmental impact statement for a proposed Plutonium Bomb Plant (PBP) at the Savannah River Site (SRS).

1. NNSA has not complied with NEPA

A. A supplemental or new Programmatic Environmental Impact Statement (PEIS) is required.

The NOI correctly states that NNSA prepared a PEIS in October 2008. *Final Complex Transformation Supplemental Programmatic Environmental Impact Statement* (DOE-EIS-026-S4). The NOI also references the PEIS Record of Decision (ROD). 73 Federal Register 77644-77656 (December 19, 2008). That ROD states:

NNSA has decided to implement its preferred programmatic alternative as described in the SPEIS and summarized in this ROD. This decision will transform the plutonium and uranium manufacturing aspects of the complex into smaller and more efficient operations while maintaining the capabilities NNSA needs to perform its national security missions....

Manufacturing and research and development (R&D) involving plutonium will remain at the Los Alamos National Laboratory (LANL) in New Mexico.

73 FR 77644.

NNSA now is reversing that decision in establishing a plutonium manufacturing operation at SRS, in addition to LANL. Such a proposal is not a smaller and more efficient operation. NNSA must first issue a new or supplemental PEIS to justify the new purpose and need, analyze all reasonable alternatives, and environmental impacts. 40 CFR 1502.13 and 1502.14.

A new or supplemental PEIS is certainly required before the proposed SRS DEIS can be properly scoped and issued. The PEIS process should include a draft PEIS and hearings across the nation, similar to those done in 2008 for the Complex Transformation PEIS. Thus, DOE cannot proceed with any actions related to establishing a plutonium manufacturing operation at SRS until it first completes a legally and technically adequate new or supplemental PEIS and a new ROD.

B. NNSA has decided to proceed with the SRS pit bomb plant without NEPA compliance.

The May 10, 2018 Joint Statement of Under Secretary of Defense for Acquisition and Sustainment Ellen M. Lord and Under Secretary for Nuclear Security and Administrator of the NNSA Lisa Gordon-Hagerty should have been preceded by a supplemental or new PEIS.

While described as a “recommended alternative,” the Joint Statement in fact is a decision to try to produce 30 pits a year at LANL and 50 pits a year at SRS. Despite the PEIS stating that LANL could produce up to 200 pits per year using multiple shifts, the Joint Statement implicitly states that previous PEIS analysis is inadequate and explicitly states that NNSA will no longer rely “on a single production site,” which was the preferred alternative and the decision made in the 2008 ROD.

Thus, NNSA has made a decision and is acting to implement that decision, despite not having an adequate PEIS. Further, NNSA admits in the NOI that it does not have an adequate SRS EIS to support the decision.

NEPA does not allow such predetermined decisions, so the May 10, 2018 Joint Statement should be revoked and should not be used to support any actions related to plutonium manufacturing operations at SRS.

2. DOE must undertake additional analysis of the MOX Plant and SRS plutonium manufacturing capabilities for the new or supplemental PEIS.

The May 10, 2018 Joint Statement is the “repurpose” the MOX Plant for plutonium pit production. However, there is no analysis of what specific actions are needed for such a new function. Nor is there any analysis of what aspects of the existing structure are defective and will have to be removed and replaced. For example, there are workers that have stated that rebar and other fundamental structural aspects of the building are defective. A comprehensive analysis of any defects in design or construction of the facility must be done. The costs, risks, and timeframes for such a repurposing must be

compared with those aspects of a new plutonium manufacturing facility not using the MOX Plant.

Of course, since SRS has never had the plutonium manufacturing capability, a comprehensive analysis must be done of what infrastructure, workforce, safety culture and other capabilities are required, how they can be obtained, and what costs and environmental impacts would be.

Since there were have very significant health and safety problems at the Rocky Flats Plant, the nation's major plutonium pit manufacturing facility, there must be an analysis of how to avoid or mitigate such impacts at any new site, especially including SRS.

All of those analyses must be included in the new or supplemental draft PEIS to provide the information that decisionmakers and the public need to make programmatic decisions regarding expanding pit manufacturing at LANL, SRS, or any other site.

3. Alternatives to 80 plutonium pits per year manufacturing capability must be considered.

For more than 30 years, the U.S. has not manufactured 80 plutonium pits in any year, let alone 80 pits each year. During that time, the number of nuclear weapons and their reliability has been maintained. The proposed 80 pit capability by 2030 would produce 800 new pits by 2040, 1,600 new pits by 2050, 2,400 new pits by 2060, 3,200 new pits by 2070, and apparently more pits forever. There is no basis for a large increase in pit production capability, nor whether there is an actual need for those pits. Nor has there been any analysis of, if those numbers of pits are necessary, why the existing stockpile of more than 15,000 pits at the Pantex Plant could not provide some or all of the "needed" pits.

Thus, alternatives of a lesser number of new pits, re-using existing stockpiled pits, as well as "no action" of producing no new pits must be considered in the new or supplemental PEIS.

4. New waste disposal facilities for plutonium manufacturing wastes must be analyzed.

The Rocky Flats Plant, the U.S. major plutonium pit manufacturing facility for more than 35 years, produced millions of cubic feet (more than 100,000 cubic meters) of transuranic (TRU) waste. Congress designated the Waste Isolation Pilot Plant (WIPP) as the disposal site for such legacy TRU waste. However, in the 1992 WIPP Land Withdrawal Act (Public Law 102-579) Congress explicitly limited WIPP's capacity to no more than 6.2 million cubic feet of TRU waste. Section 7(a)(3). Thus, Congress recognized that additional TRU waste disposal facilities would be required if there was a significant, enduring plutonium pit manufacturing capability.

DOE is now proposing such an enduring plutonium pit manufacturing capability, for which WIPP is neither designed nor permitted. Thus, the new or supplemental PEIS must

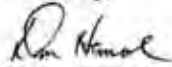
examine the alternatives for long-term storage and disposal of TRU waste. At a minimum, the analysis must include the amount and types of TRU waste that would be generated, how that waste would be stored at the manufacturing site(s), the number and types of waste disposal facilities that could be needed, and whether TRU waste disposal could be co-mingled or co-located with repositories for defense high-level waste and spent nuclear fuel.

5. Any SRS EIS must look at cumulative impacts and reasonable alternatives

While SRS has never had a plutonium manufacturing mission, it has other missions, including the cleanup of contamination from past operations and ongoing waste management activities. All of the missions and their impacts must be considered in any analysis of a new mission of plutonium manufacturing.

Thank you for your careful consideration and response to these comments and all others are that being submitted.

Sincerely,



Don Hancock

Email: gricdon@earthlink.net

From: ROSE HAYES <rosehayes@aol.com>
Sent: Friday, May 29, 2020 11:20 AM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] EIS, SRS Plutonium Pit Production

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

Re: EIS, SRS Plutonium Pit Production

Recently, I published an article in the Aiken Standard outlining radioactive contamination problems that occurred at Rocky Flats CO during the plutonium pit production program there. The relevance of those problems for the proposed plutonium pit processing at SRS is undeniable. My concerns are reiterated here for NNSA consideration.

What happened at Rocky Flats is relevant for the proposed pit production program at the Savannah River Site (SRS). Briefly, contamination at Rocky Flats became so

1/2-i

dangerous to the community that more than 70 FBI and EPA agents raided the plant in 1989. The pits program was shut down. It was then moved to Los Alamos, NM. Los Alamos has had processing problems.

One government report indicates Rocky Flats cleanup costs were over \$7 billion and 1,300 acres still remains contaminated and off limits to the public. That area must be tested every 5 years to ensure that intervention strategies set in place for public protection, continue to function. Given the half-life of plutonium, the area is essentially permanently poisoned.

1/2-i
(Cont'd)

Most recently, a section of highway outside the fenced off area was discovered to be highly radioactive and construction was shut down for remediation. That incidence indicates the toxic pollution can, and has, traveled off the area closed to protect public safety and health from the contamination. Intervention strategies did not work.

The 2018 Department of Defense Nuclear Posture Review now calls for the production of some 800 new pits by 2030, or 80 per year. The government proposes to repurpose the cancelled MOX facility at SRS to manufacture 50 of the 80 pits. Plutonium pits production will be a new process for SRS. No tests or validations have been conducted to determine whether SRS can meet the mission as designed and whether the shuttered and incomplete MOX facility will be capable of processing pits on schedule and safely.

2/1-h
3/2-e

The Defense Nuclear Facilities Safety Board will not definitively commit to overseeing the design and construction of repurposing the MOX facility for plutonium pit production.

4/6-p.4

Given the assumptions that have proven to be wide of the mark where the pits are concerned, it is unacceptable for the federal government to ask any community to accept such risks until all elements of such radioactive processes have been studied, tested, verified, and certified.

5/5-a

Further, imposing a plutonium pit production program on our community is in violation of the U.S. 1982 Nuclear Waste Policy Act (NWPA).

That act assures that:

“DOE conduct activities in an open environment,
identify and consider the concerns of interested parties,
provide for involvement of affected parties,
adhere to the intent of Congress as expressed through the act, and
provide for equitable treatment for all parties affected by implementation of
the act.”

The Act also provides for a U.S geologic repository for high-level radioactive waste by the mid-1990s. It is now 2019.

6/6-p.5

The Act also provides that state governments are authorized to veto a national government decision to place a waste repository within their borders unless both houses of Congress vote to override the state veto.

SRS was never been studied, tested, or certified to be a long-term nuclear repository. Yet the waste created there, the waste brought there from other U.S. sites, and the waste that is received there from international sites, remains there in our backyards.

SRS already contains roughly 12 metric tons of surplus plutonium. SRS contains more curies of radioactive waste than any other site in the Department of Energy’s

7/6-j.2
6/6-p.5
(Cont’d)

nuclear complex? Some of it has been there for well over half a century. More will be added by plutonium pit production. The government has, in effect, created a nuclear waste repository at SRS in violation of the U.S. 1982 Nuclear Waste Policy Act.

There is no government cradle to grave plan for highly radioactive waste management. There is no existing technology to destroy all residuals of plutonium contamination from the waste streams?

Given all this, how will plutonium pit production at SRS adhere to the intent of the Nuclear Waste Policy Act? How have our community concerns, interests, and involvement been addressed? How is all this equitable for us?

For all the reasons I have covered here, and many more, I strongly advise no plutonium pit production program be implemented at SRS.

Thank you for addressing my concerns.

Dr. Rose O. Hayes
Aiken, South Carolina

roseohaves@aol.com

803/599-1265

7/6-j.2
6/6-p.5
(Cont'd)

5/5-a
(Cont'd)

From: Richard Henighan <rhenighan@igc.org>
Sent: Friday, May 29, 2020 7:53 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] Comments on Draft EIS for plutonium pit production at the Savannah River Site in South Carolina

Dear Ms. Nelson:

I am writing to oppose plutonium pit production at the Savannah River Site in South Carolina—the No Action Alternative in the Draft EIS.

1/5-a

The US has more than 15,000 plutonium pits from retired warheads in storage at the Pantex Plant in Amarillo, TX. These pits can be reused if needed, saving taxpayers billions of dollars. In addition, The US has more than 4,000 nuclear warheads in the stockpile right now.

2/1-b

Building a new bomb plant to make new plutonium pits is a provocative act; it will contribute to an escalation of the global nuclear arms race and will undermine US nonproliferation goals.

3/2-g

Making new plutonium pits will generate large radioactive and toxic waste streams. The Savannah River Site is already highly polluted and should instead focus on the health and safety mission—cleaning up wastes from ongoing and legacy operations.

4/6-j.8

We don't need more plutonium pits; we need health care; we need a massive investment in safety and security against pandemics; we need protections for workers and businesses crushed by the economic collapse.

2/1-b
(Cont'd)

Finally, the NNSA is legally required to update its Programmatic Environmental Impact Statement on expanding plutonium pit production BEFORE it can prepare a site-specific EIS at Savannah River. This PEIS must fully analyze the reuse of the 15,000+ plutonium pits in storage at Pantex before it embarks on a dangerous, multi-billion dollar plan to build an unnecessary new bomb plant.

5/4-f

Sincerely,

Richard Henighan

Seymour, TN

From: Al Herman <cinerguy@mindspring.com>
Sent: Monday, June 1, 2020 5:52 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] Comment in Opposition to Plutonium Pit Production Proposed for SRS in the Draft EIS

June 1, 2020

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.

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 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.

4/2-g

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

5/2-h

funding to switch tracks from a nuclear security and environmental management program to a nuclear weapons manufacturing program.

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,
Allan Herman
Decatur, Georgia

6/4-e

From: Elaine Holder <elaineholder@att.net>
Sent: Saturday, May 30, 2020 6:11 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] plutonium pit production at the 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

Dear Ms. Nelson:

I am writing to oppose plutonium pit production at the Savannah River Site in South Carolina—the No Action Alternative in the Draft EIS. In addition, I believe the NNSA must complete a new Programmatic EIS before it can prepare a site-specific Environmental Impact Statement.

There is no need to replace plutonium pits. There are plenty in storage so no need to make more. We should be negotiating with other countries to get rid of nuclear weapons instead of adding more nuclear weapons and their components to our already large store.

Elaine Holder
elaineholder@att.net
274 Cuesta Drive
San Luis Obispo, CA 9405

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

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

From: Tom Howell <tom.howell@mindspring.com>

Sent: Monday, June 1, 2020 7:00 PM

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

Cc: Tom Howell <tom.howell@mindspring.com>

Subject: [EXTERNAL] Comment in Opposition to Plutonium Pit Production Proposed in the Draft EIS

June 1, 2020

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,

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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, more nuclear weapons, 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

5/2-h

funding to switch tracks from a nuclear security and environmental management program to a nuclear weapons manufacturing program.

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.

6/4-e

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.

The proposal to produce more plutonium pits does not make sense. We already have more than 15,000 existing pits in storage, as well as more than 5,000 nuclear weapons, of which 1,600 are strategically deployed. Producing more of these unneeded nuclear triggers is a very large and unnecessary expense, which will add other large, unnecessary, and dangerous expenses. We should avoid any actions that can lead to another nuclear arms race. Arms races are expensive, especially arms races that involve nuclear weapons. The nuclear arms race between the United States and the Soviet Union was very expensive. It took many years of difficult negotiations to reduce numbers of nuclear weapons to the levels that exist today for Russia and our country. We should be respecting and supporting the Nuclear Non-Proliferation Treaty, not undermining that valuable treaty. A new nuclear arms race could cost \$1 trillion or more in just a few decades.

7/1-b
8/2-c
3/2-g
(Cont'd)

Making more unneeded plutonium pits will mean the creation of more radioactive waste, which must then be safely stored for thousands of years at considerable expense. Past production of nuclear weapons, including the manufacture of plutonium pits, resulted in significant radioactive contamination at the Rocky Flats Plant in Colorado and at other sites. It should be remembered that the half-life of plutonium is 24,000 years, and that safe storage of that kind of dangerous radioactive material for even 1,000 years will not be inexpensive.

9/2-i

If radioactive elements are dangerous for 10 to 20 times the length of their half-lives, and if plutonium has a half-life of 24,000 years, then radioactive plutonium waste remains dangerous for 240,000 to 480,000 years. Safely storing that

10/6-j.14

radioactive waste for 240,000 or 480,000 years will be very expensive. There is also the problem of maintaining appropriate safety standards for that amount of time, as well as guaranteeing that high training standards will be maintained for all those years for all of the custodians watching over the radioactive waste, especially considering that no government has ever lasted that long, or even lasted 24,000 years. The cost to taxpayers of safely storing the radioactive waste for those amounts of time should be carefully estimated so that future generations of taxpayers will know how much of an unnecessary financial burden we expect them to undertake.

10/6-j.14
(Cont'd)

The overall existing safety record for safe storage of radioactive materials and nuclear waste is far from perfect, and in some cases is downright shameful. We should be devoting more thought, money, study, and effort to safely cleaning up and correcting the many mistakes, contaminations, health problems, accidents, leakages, and spills of radioactive materials that have occurred since the 1940s. Money should not be diverted to making additional unnecessary nuclear weapons or extra trigger pits, especially when we already have more than 15,000 extra trigger pits, which are estimated to have a minimum plutonium pit life of 85 to 100 years or more.

7/1-b
(Cont'd)

11/1-c

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

Respectfully submitted,
Tom Howell
725-D Montague Road
Columbia, SC 29209

tom.howell@mindspring.com

From: Ralph Hutchison <orep@earthlink.net>
Sent: Tuesday, June 2, 2020 3:09 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] Comments on Draft SRS EIS on plutonium pit production

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

2 June 2020

Comments of the Oak Ridge Environmental Peace Alliance on the
Draft Environmental Impact Statement for Plutonium Pit Production
at the Savannah River Site in South Carolina

The Oak Ridge Environmental Peace Alliance is a grassroots public interest organization located in East Tennessee. We have been actively engaged in monitoring activities at the Department of Energy's Oak Ridge Reservation for more than 30 years, including actively participating in the Complex Transformation Programmatic Environmental Impact Statement process in the middle of the last decade as well as numerous NEPA studies of activities on the Oak Ridge Reservation, and, more recently, at Savannah River and at Los Alamos.

NEPA in the time of COVID-19

On April 17, 2020, I wrote to the NEPA office to object to the NNSA's decision to push forward with several NEPA processes, including this one, during a time of national emergency. My objection included a request that echoed the request of 38 members of Congress asking the Administration to respond to the disruption caused by the COVID-19 pandemic and the resulting national emergency to hit the pause button on public comment period and public hearings until the national emergency was over.

NNSA's response was to send me a copy of a draft letter they had written to someone else.

Following that, I wrote to object to the "virtual" public hearing, noting that it would, by its very nature and by its reliance on electronic technology, exclude some people from participation. The exclusive nature was compounded by the challenges of the COVID-19 pandemic. Again, NNSA declined to postpone the hearing until an in-person hearing could be held. I attempted to attend the "virtual" public hearing. I initiated my log-in attempt thirty minutes before the hearing was scheduled to begin; after a very frustrating time with technical support (not provided or facilitated by NNSA), I was able to join the hearing twenty minutes late. I am aware of other people who are not as persistent or successful and were unable to participate in the public hearing.

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2/4-a.1
3/4-b

I believe NNSA's insistence on continuing the NEPA process with a nominal adjustment to the schedule violates the spirit of NEPA's public participation requirement and completely fails to understand the disruptive nature of the pandemic on people across the nation. I believe the NNSA's use of exclusionary electronic technology to hold a "virtual" public hearing violates both the spirit and the letter of NEPA; the "virtual public hearing" on the SRS Draft EIS was invalid.

For the record, I will attach my correspondence on both of these subjects to the end of these comments.

THE NEPA PROCESS

The NNSA's Draft EIS on pit production at SRS is premature.

The plan to produce 50 warheads/year at SRS is not part of any programmatic Record of Decision made by NNSA. This programmatic decision is not supported by the 1997 Stockpile Stewardship and Management Programmatic Environmental Impact Statement that established an annual production limit of 20 pits, nor is it supported by the 2008 Programmatic Environmental Impact Statement that did not consider production at more than one site. To be producing site-specific EISes (at Savannah River) and SAs (at Los Alamos) before subjecting the two-site program to a programmatic review is to put the cart before the horse. NNSA does not have a valid Record of Decision from which to tier these NEPA reviews. This was the case in 2005, when NNSA embarked on a site-wide EIS at the Y-12 site in Oak Ridge before completing the Complex Transformation PEIS that would decide where future Enriched Uranium operations would take place. When the chronological illogic was pointed out, NNSA put the Y-12 site wide EIS on hold until the PEIS was completed. It is unfortunate that current NNSA personnel seem not to have benefited from what should have been a lesson learned. In any event, what was true then is true now—you can't tier a site-specific environmental analysis from a programmatic decision that has not been recorded.

NNSA cites decisions by the Administration and Congress as the justification for moving forward with this SA, but neither the Administration nor Congress has the right to leapfrog over a programmatic decision required by NEPA regulations.

4/4-c
5/4-f

One of the fundamental requirements of a Programmatic Environmental Impact Statement should be to justify the program. In this case, NNSA proposes a significant change in its program, a dramatic expansion of US pit production capacity. This expansion is rooted in a "requirement" developed by NNSA and subsequently sold to both Department of Defense and Congressional leaders.

In its Supplement Analysis for the Complex Transformation PEIS, NNSA says it "did not foresee an imminent need to produce more than 20 pits per year to meet national security requirements" in the 2008 CT-PEIS. The CT-PEIS SA goes on, in the next sentence, to say, "Since 2008 NNSA has emphasized the need to eventually produce 80 pits per year." This remarkable leap serves as the sole justification for the current multi-billion dollar effort to expand plutonium pit production capacity at LANL and to build an entire new pit production facility in the repurposed MOX Fuel Fabrication Facility at Savannah River.

The Draft CT-PEIScSA offers no technical justification for the dramatic 400% shift in production capacity requirements over current production capacity.

In fact, none of these numbers or requirements are justified on technical grounds; no assertion is made that 80 pits/year, a very specific number, is tied to a physical requirement for pits to maintain a stockpile of 1,500 warheads. Instead, the nuclear weapons

establishment simply demands that the US taxpayers spend tens of billions of dollars for production capacity to reconstitute the active US nuclear stockpile in its entirety every twenty years.

4/4-c
5/4-f
(Cont'd)

The ramifications of this decision—environmental and otherwise—require the preparation of a new or a full Supplement to the existing PEIS. The Draft SA is wrong when it finds that programmatic changes are not significant to warrant a full analysis.

Siting a Facility at Savannah River

The Draft SRS EIS draws back the curtain on a process to repurpose the failed MOX facility at Savannah River to its new task—manufacturing nuclear weapons pits from plutonium. Decisions have been made and announced, prior to any NEPA process that involved the public, to adopt what NNSA and DoD call the “two prong approach,” manufacturing pits at two locations.

The Draft EIS takes this decision-making process as a given and moves on from there. NEPA, however, requires a different decision-making process; underscored in this case by legal requirements established in a court order in 1998 (Natural Resources Defense Council v. Pena).

Currently, having already fielded the cart, is attempting to create a NEPA horse to pull it. This is obviously the wrong chronology. A Programmatic Environmental Impact Statement must start with program demands, examine the full range of alternatives, and make a reasoned decision—engaging the public at every step.

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

In the current instance, the Draft EIS leaps forward to a decision to make pits at Los Alamos and at Savannah River, a decision that is responsive not first to programmatic demands, but to the wishes of the South Carolina congressional leadership to replace the tax dollars that were being sent to the MOX debacle at Savannah River. In acceding to these wishes, NNSA fails to meet its minimum NEPA obligations and runs afoul of the 1998 court order.

The siting of plutonium production operations at Savannah River was considered and discarded in the original CT-PEIS. Since the publication of that ROD, workers at SRS have been constructing a facility, originally planned to manufacture Mixed-Oxide fuel, that has been plagued by schedule failure and massive cost overruns. The SA fails to discuss this history in its consideration of potential impacts—instead it provides numbers that are, apparently premised on a sharp, effective and efficient management team directing a major construction effort.

We do not have to wonder if that team is available—history tells us it is not. Any consideration of a major construction project at SRS should provide a detailed economic analysis of the factors that led to massive cost overruns at the MOX facility and the changes that will be implemented to guarantee (not hope) that any further construction operations will not fall prey to the same problems. This is difficult, of course, for NNSA to do because the problems that plague the MOX facility are endemic across the NNSA; they are cultural; they are the reason NNSA's major construction projects continue to wear the dubious honor of being the worst of the worst high-risk projects according to the Government Accountability Office.

7/8-d

Savannah River has other challenges as well which directly interface with the environmental analysis required in a PEIS and not present in the Draft EIS. On June 11, 2019, the Defense Nuclear Facilities Safety Board released Recommendation 2019-2 that found the likelihood of credible “energetic accidents” that “could result in very high doses, creating the potential for acute radiation sickness or fatality” was, across the 50-year lifespan of the facility, as high as 40 percent.

The Safety Board's recommendation followed a series of discussions over a period of months with NNSA personnel; the Board found DOE's response did “not obviate the need for the Recommendation.”

This is deeply troubling for a number of reasons—the failure of NNSA/DOE to act appropriately to ameliorate any risks or conditions that would contribute to catastrophic accidents; the ongoing high risk to workers and the environment; the loss of tritium capabilities to the nuclear weapons complex should such an accident occur, and the threat to other operations, including environmental restoration, research, and, in the event a pit facility were built at SRS, to weapons production programmatic activities.

8/6-p.4
9/6-k.1

Add up these considerations and they spell S-PEIS. The failure of the NNSA to carefully consider the potential downsides of co-locating a plutonium facility at a site with a known peril, especially given that the information was known to DOE at the time the Draft EIS was being prepared, points to the need for a thorough consideration of the advisability of using Savannah River for a plutonium pit manufacturing mission that NNSA claims is absolutely essential to US national security.

More Pits? Really?

The United States currently has a war reserve of plutonium pits in excess of 15,000 (26.2 metric tons, says the CT-PEIS SA) in storage at the Pantex facility in Amarillo, Texas.

In declaring its need for a production capacity of 80 warheads/year, the Draft SRS EIS ignores this trove of existing plutonium pits and fails to explain the role of these certified reliable pits in either the Life Extension Program or the Stockpile Stewardship and Maintenance Program.

This failure simply points to the need for a new Supplement to the CT-PEIS, or a new PEIS. The new PEIS should provide a complete and thorough accounting of the plutonium pit requirements, capacities and capabilities. It should include a status report on the pits in storage at Pantex—are they available for reuse? To be plundered for parts? Figured into plans for new or modified pits? It should also include a technical justification for the 80 pits/year standard which, absent that, seems to be an extreme overreach based on a number pulled out of thin air. Why 80, and not 200 or 125? Or 50 or 30? What are the stockpile requirements, and what are the possible routes to meet those requirement over time?

5/4-f
(Cont'd)
10/1-b
11/1-c
12/3-a

The Rest of the Story

In 1970 the United States promised the world a good faith effort to put an end to the nuclear arms race and to pursue complete dismantlement at an early date. In 2017, after years of pressing the US and Russia to meet their obligations under the Treaty on the Nonproliferation of Nuclear Weapons, one hundred twenty-two nations of the world voted to adopt a Treaty on the Prohibition of Nuclear Weapons. Among other things, this treaty expresses the belief by most of these nations that the United States and Russia have no intention of meeting their NPT obligations.

The decision to build a new facility to expand the US capacity to produce plutonium pits directly contradicts US obligations under the NPT and undermines the confidence of all the rest of the world in the seriousness of our nonproliferation efforts. How can we make the case that Iran or North Korea can not have nuclear weapons programs when we are investing tens of billions of dollars in new production facilities at Savannah River and Oak Ridge—the Uranium Processing Facility?

Of course we can't. In the past, the DOE has considered nonproliferation impacts in NEPA documents. No program cries for such an analysis more than the decision to build a plutonium pit facility, and a PEIS must include this analysis. It may be true that the DOE and Department of Defense and Congress have declared a requirement for expanded pit capacity, but it is also true that the NPT is, according to our Constitution, the supreme law of the land. It supercedes the temporal (and in this case extremely suspect) justifications for expanded pit production, and a Programmatic EIS should fully examine the program in the context of US treaty obligations.

5/4-f
(Cont'd)
13/2-a
14/2-b
15/2-c

THE DRAFT SRS EIS

The plan to construct a plutonium pit fabrication facility at Savannah River must be subjected to a cradle-to-grave environmental analysis. A new pit production mission at Savannah River would mean the importation of tons of highly radioactive plutonium into South Carolina. If pits are eventually produced, radioactive and hazardous waste streams will be produced. The SRS EIS must consider each of those waste streams and follow them, assessing their impacts, from importation to final disposal. Impacts must be assessed cumulatively as well as individually.

Meanwhile, the Savannah River Site faces massive environmental liabilities from past activities; tens of millions of gallons of waste left from the production of plutonium and other nuclear weapons materials. Each year, NNSA makes a decision about how to spend the money it can draw from the taxpayer—the current (FY21) budget proposal seeks significant cuts in Environmental Management funds and dramatic increases (25%) in nuclear weapons production funding.

This competition—clean up or build up?—is built into the DNA of the Department of Energy and NNSA. In writing about cleaning up excess high risk facilities in Oak Ridge, the DOE's own Inspector General noted that addressing the risks posed by the most dangerous excess facility in the DOE complex would require shifting money from production operations.

This same competition exists at Savannah River. Investing billions of dollars in a new production mission at SRS will mean disinvesting billions of dollars in environmental restoration, Decontamination and Decommissioning, meeting cleanup milestones, and remediating the damage caused to the environment by over six decades of SRS operations.

16/6-j.8

STILL WAITING FOR ADEQUATE ANSWERS

The Oak Ridge Environmental Peace Alliance submitted scoping comments on the SRS EIS on pit production. In those comments we raised a number of serious issues. We attach those comments for the record—insofar as the Draft EIS fails to address them, we respectfully ask for answers.

17/4-i

Finally, the plan to repurpose the failed MOX facility is a boondoggle waiting to happen. SRS and NNSA have failed to date to account for the billions of dollars of cost overruns and the always receding schedule of the MOX project. It didn't fail by accident or by fate—it failed for reasons. Those reasons, left unaddressed, will doom the next major project at SRS, in this case, the pit production facility. Any decision, especially one that claims to be required for national security reasons, must include a full examination of the reasons for the failure of the MOX plant.

7/8-d
(Cont'd)

Absent that, this Draft EIS is just paperwork being lined up to authorize an amazing fraud. Pits will not be produced at Savannah River by 2030. On the one hand, that is okay—we don't need those pits, with thousands in storage at Pantex and a reliable stockpile until 2050 or beyond. On the other hand, it is unconscionable to devote taxpayer resources to an unnecessary program when the nation's actual security needs—preparation for the next pandemic, or the next round of the current pandemic; security of our infrastructure; education of our children—go unmet.

18/5-a

Submitted by Ralph Hutchison, coordinator

Oak Ridge Environmental Peace Alliance, P O Box 5743, Oak Ridge, TN 37831, orep@earthlink.net

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ATTACHMENT I: Correspondence re: NEPA during the COVID-19 National Emergency

17 April 2020

Ms. Nelson, et al,

I have received notice of a virtual public hearing on 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.*

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.

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.

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ATTACHMENT 2: Further correspondence on NEPA during the COVID-19 pandemic

April 21, 2020

To whomever "responded" to my letter:

I am writing to strongly object to your unsigned non-response to my letter (Did you even read it? It was about your decision to hold a "virtual" public hearing.) and to reinstate my call for your reconsideration of the "virtual" public hearing.

My letter suggested that a "virtual" meeting is necessarily exclusive of some members of the public, especially those who are constrained by the state of emergency, the economic collapse, and stay-at-home orders. It is indisputable that there are people who have no computer access and have been, because of the choices imposed on them by the economic collapse that is part of the NATIONAL EMERGENCY, forced to forgo refilling cell phone cards. I am not speculating that these people exist; I know several.

That is reason enough for you to reconsider the appropriateness of a virtual public hearing. The fact that our lives are also disrupted by the COVID-19 NATIONAL EMERGENCY, and the fact that 38 members of Congress have recognized this and called for the rescheduling of public meetings is even more reason for you to reconsider.

As if that isn't bad enough, you glibly suggest to Mr. Clements, and now, by extension, to me, that since we have access to computers, everything is fine. This is utterly inane, and an insult to boot. The point of NEPA is to permit the participation of ALL members of the public, not just those who are privileged, rich enough to have computers at home, and employment that allows them the capacity to address these issues despite the disruption of their lives due to the NATIONAL EMERGENCY.

I appreciate that "The proposed pit production projects at Los Alamos and Savannah River are one of our highest priorities." Obeying the law should also be one of your priorities, and that includes holding a public hearing that is open to all members of the public, without exception. To do otherwise is tantamount to holding a hearing on the eighth floor of a building that lacks an elevator, excluding people who cannot walk up the stairs. I suppose if I wrote a letter complaining about that your response would be, "Well, you and Tom Clements seem to be able to navigate stairs, so it's all good." But of course you wouldn't do that. Why? Because it is against the Americans with Disabilities Act for a federal agency to hold a meeting that precludes participation by denying access. A "virtual" meeting is the same thing. Exactly the same thing in terms of exclusion.

There is absolutely nothing about your pit production projects except your arbitrary schedule that compels you to push forward with the NEPA process ignoring the requests from Congress and the public, and to pretend that a fifteen day extension of a comment period and a "virtual" public meeting are sufficiently responsive to our requests.

I hope this letter helps you understand what is at stake. The only thing worse than holding a "virtual" public hearing, I should think, would be for you to have a federal judge ask you to defend that decision before setting it aside because it necessarily excluded some members of the public, and requiring you to hold another duly noticed public hearing. This would set the schedule for your highest priority project back even further.

It's a NATIONAL EMERGENCY, declared by the President of the United States. Until the pandemic crisis is over, it is not business as usual for us, and it shouldn't be for you either.

Sincerely,

Ralph Hutchison

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ATTACHMENT 3: Scoping comments of the Oak Ridge Environmental Peace Alliance on the SRS EIS for Plutonium Pit Production.

SCOPING COMMENTS ON THE DEPARTMENT OF ENERGY'S ENVIRONMENTAL IMPACT STATEMENT FOR PLUTONIUM PIT PRODUCTION AT THE SAVANNAH RIVER SITE

from

THE OAK RIDGE ENVIRONMENTAL PEACE ALLIANCE

25 JULY 2019

The Oak Ridge Environmental Peace Alliance identifies the following concerns that must be addressed in detail in any Environmental Impact Statement prepared for plutonium pit production at the Savannah River Site.

1. In its haste to “re-purpose” the former MOX facility at Savannah River, the NNSA is putting the cart before the horse. The production of plutonium pits for nuclear weapons was last analyzed in detail in the Complex Transformation Supplemental Programmatic Environmental Impact Statement (SPEIS) which resulted in a Record of Decision authorizing the production of “no more than approximately 20 pits per year at Los Alamos National Laboratory.” (64 FR 50797, September 20, 1999.)

This ROD stands until it is amended, and all plans for plutonium pit production must be tiered from the programmatic decision; this is the precise purpose of a programmatic decision.

In Oak Ridge, in 2005, DOE/NNSA announced that it would begin preparation of an Environmental Impact Statement for the Uranium Processing Facility at the Y-12 Nuclear Weapons Complex *before* it had completed the Complex Transformation PEIS in which it would, ostensibly, consider complex-wide alternatives for uranium operations before making a decision about the location of future uranium operations.

At that time, the Oak Ridge Environmental Peace Alliance questioned how a site-specific EIS could be prepared before the programmatic decision was made without prejudicing the outcome of the programmatic decision. In response, the DOE/NNSA announced that the Y-12 specific EIS would be placed on hold pending the outcome of the Complex Transformation PEIS, and that subsequent decisions regarding uranium operations would be tiered from the programmatic ROD.

This same principle applies to the current situation with the SRS EIS for plutonium pit production, only moreso. Rather than having no programmatic ROD in place for pit production, NNSA has a ROD that specifies pits will be produced only at LANL.

Clearly, a Joint Statement (May 10, 2018) and a subsequent issuance of a Notice of Intent that run counter to the existing Record of Decision is placing the cart before the horse—which NEPA, of course, forbids. It indicates a decision has been made before the EIS process has a chance to consider that decision; it turns the legally required NEPA chronology on its head, creates a presumption, and essentially negates public input.

NNSA/DOE must, in this case, put the SRS and any other plutonium pit decisions on hold until such time as the ROD is amended in order to avoid the prejudicing of the Supplement Analysis for the SPEIS and the issuance of a new or amended ROD. This is the NEPA horse that pulls all other decisions behind it.

While the immediate past behavior of NNSA at Savannah River—the multibillion dollar MOX boondoggle, considered by many knowledgeable taxpayers to be the result of a legal conspiracy between South Carolina political leaders and the NNSA, one which inarguably wasted billions of taxpayer dollars—indicates that NNSA’s priorities do not include good stewardship of taxpayer dollars, nevertheless, we are well within our rights, and fully supported by the law, to insist that NNSA make its decisions in the proper order.

NNSA must place the SRS EIS on hold until the Savannah River site has been identified through a new or amended SPEIS ROD as a site for pit production.

2. Congressional or other requirements do not equal “need.” In the Federal Register Notice for the SRS EIS, NNSA declares that “the Department of Defense requires NNSA to produce no fewer than 80 plutonium pits per year by 2030.”

There is, to date, no actual documentation or justification for this number—80 pits per year—that would indicate or determine there is a true “need” for this production capacity.

The history of the “need” for plutonium pit production reveals a wide range of “needs.” As recently as 2008, the number of pits “needed” was capped at “approximately 20.” Prior to that, the need was assessed at 125 pits/year. Other numbers have also been floated.

But the actual *need* for plutonium pits is a real number that can be derived and publicly justified. It should reflect any need for replacement of pits due to aging issues — the JASON have reported there is no need for any pit replacement due to aging for at least 40-45 years; any need for pit production for new design nuclear weapons—currently new design weapons are forbidden by law, and no designs have been authorized by Congress that would *require* new pit production; and a consideration of currently available pits—approximately 15-20,000 plutonium pits which have designs that have been fully certified are in storage at Pantex in Amarillo, Texas.

Despite repeated calls for a pit needs assessment that is based on real-world need rather than a wish list created by lab personnel in search of funding for projects; or DoD, DOE or Congressional personnel who have interests other than national security needs—keeping programs funded, creating a hedge against an imaginary and highly unlikely failure of current tested systems, sustaining a workforce capable of designing and building new nuclear weapons—no actual documentation of a need for new plutonium pit fabrication beyond the capacity that already exists has been produced.

NNSA must document an actual program-based justification of any stated need for expanded plutonium pit production that requires a facility at Savannah River with a 50 pit/year production capacity in the SRS EIS—statements and Congressional requirements do not constitute a real-world need; they are wishes and desires and may not be substituted for actual needs.

3. Sunk costs. In its announcement of the SRS Pu Pit EIS, NNSA says it wants to “repurpose” the now abandoned MOX facility at Savannah River. While this effort might sound like it is trying to make lemonade from a giant lemon, recouping some value for the taxpayer from the billions of dollars poured into the MOX facility, it is, in fact, a classic example of what Nobel Prize winning economist Daniel Kahneman identifies as the fallacy of sunk costs. It could also be characterized as throwing good money after bad.

Kahneman notes that it is almost fundamental to our nature as human beings to want to salvage value from sunk costs rather than cut our losses and walk away. He describes a person purchasing a ticket to a movie only to discover, ten minutes into the film, that it’s a bad film and she doesn’t care to see it to the end. At this point, she has a decision to make—write off the \$10 ticket and use the next 90 minutes in a pursuit she will enjoy more, or sit through 90 minutes of a bad movie to validate the expense of \$10. Many people choose the latter, not realizing that the \$10 is gone the minute the ticket is purchased, a sunk cost, and all that is left is the decision of how to extract the most pleasure/value out of the next 90 minutes.

The history of the MOX facility at Savannah River is long and ugly. From the beginning four things were true about the MOX facility:

- It was supported and sustained by powerful Congressional interests who had, as their primary motivation, the flow of money into their district/state;
- It was managed by a federal agency with an unparalleled and almost unsullied track record for failure in major construction projects, the NNSA.
- It failed repeatedly and spectacularly to constrain costs and to meet construction schedules.
- These flaws were pointed out, repeatedly and consistently throughout the entire lifespan of the MOX program, by nongovernmental watchdog organizations like Savannah River Site Watch and the Alliance for Nuclear Accountability.

How does NNSA plan to oversee a transition even more likely to present design, construction and funding challenges—the repurposing of a half-built facility to a new purpose for which it was not originally designed—when all four of the above circumstances still apply?

An SRS EIS on plutonium pit production must examine in detail the challenges—fiscal, environmental, programmatic and calendar—presented by the repurposing of the MOX facility and present a credible argument to the public that the repurposing is 1) not doomed to suffer the same cost and schedule overruns; 2) not doomed to suffer from the project management practices

endemic in the NNSA that lead to cost and schedule overruns; and 3) is not just a naked attempt by politicians to channel taxpayer dollars into another NNSA construction boondoggle. Furthermore, NNSA should explain why it thinks its critics, who were consistently right about the MOX facility, are not equally right this time.

Selecting the Savannah River Site for the demanding work of plutonium pit production, a mission it has never had, must be based on a rationale that reflects more thought and wisdom than "Well, we have this half-built building and a lot of workforce to take care of."

NNSA must compare in detail the costs of "re-purposing" with new construction at SRS, LANL, or another site. NNSA must also document and address challenges peculiar to the repurposing of the MOX facility to a new mission.

4. NNSA must consider the proliferation implications on an investment of billions of dollars in a new plutonium pit production facility that would expand the US capacity for pit production 400% every year for decades to come.

An EIS process is required to consider the implications and consequences of any decision through a variety of lenses that take into account policy implications that have the potential to affect the environment.

A decision to build a facility to produce plutonium pits in excess of any US need will trigger subsequent actions by US adversaries and competitors, undermining stated US nonproliferation goals. What's more, any proposed production of new or radically re-designed plutonium pits (and what other kinds would be manufactured in a new facility? We have 20,000 tested designs in storage at Pantex!), is likely to increase pressure to resume full-scale nuclear testing as the military will be reluctant, to say the least, to deploy and rely on weapons that have not been demonstrated to work.

For those who want to return to the "good old days" of the Cold War nuclear arms race, when money flowed freely to weapons contractors and DOE/NNSA labs, production facilities, and the Test Site, this is not a problem.

But the EIS must recognize and examine the implications of its actions not in the world of the past, but in the world in which we currently live—a world in which 122 nations have approved the 2017 Treaty on the Prohibition of Nuclear Weapons and in which the United States is obligated by the 1968 Treaty on the Nonproliferation of Nuclear Weapons to pursue in good faith an agreement on the cessation of the arms race and complete disarmament at an early date.

Expanding pit production, or even investing billions of dollars in the capacity to produce 80 plutonium pits/year, represents a dramatic and provocative challenge to the rest of the world, especially countries like North Korea and Iran where the US is exerting extreme pressures to constrain their nuclear weapons programs (real or imagined) and capabilities.

The provocative nature of this activity does not require actual pit production. The pursuit of the capability to produce 80 pits/year gives the lie to any stated intention to achieve nuclear disarmament; it sends a clear and very dangerous message to the rest of the world.

Consideration of proliferation impacts of US decisions is not without precedent in DOE's NEPA world; proliferation impacts must also be a consideration in this decision and must be fully examined in the SRS EIS and any other EISes relating to expanded pit production.

5. What Savannah River needs. The Savannah River Site is an environmental disaster already. At the Y-12 Nuclear Weapons Complex in Oak Ridge, a Superfund site since 1989, we experience the conflict between weapons production activities and environmental, worker and public protection on a daily basis. Three of the facilities identified by DOE's Inspector General as "presenting an ever-increasing risk to workers and the public" are at Y-12. They languish in various stages of disrepair, no longer used. But environmental remediation is precluded by their presence inside a security exclusion zone, making cleanup cost prohibitive.

Savannah River is not immune to this problem. Developing new weapons production activities at SRS, with a program expected to last for many decades, will inhibit cleanup activities at the site.

This challenge is compounded by the fact that NNSA and DOE place a higher priority on nuclear weapons production than they do on worker, public or environmental health and safety. In the Congressional budget world, funding for weapons increases annually even as the stockpile declines. And, perversely, funding for cleanup declines even as the dangers presented by unaddressed risks increase.

The SRS EIS must examine plans for significantly financial investment in a new plutonium production facility in the context of all funding demands on the site, including the need to address the 37 million gallons of highly radioactive liquid wastes that lack a final disposal plan.

From: eriklib@earthlink.net <eriklib@earthlink.net>
Sent: Friday, May 29, 2020 6:19 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] for public hearing on plutonium pits

Dear Ms Nelson,

Building plutonium pits for nuclear weapon triggers at Savannah River site in South Carolina is preposterous. This multi-billion dollar project at the SRS robs our country of the needed resources to invest in the well being of people and the care of our earth especially now during the Covid-19 pandemic.

The ONLY argument weaponeers make for a new bomb plant to manufacture plutonium pits is for new nuclear weapons—which Congress forbade in 1993. We do not need new nuclear weapons. We do not need more nuclear weapons. We do not need a new plutonium pit bomb plant.

I do hope that many other rationale comments will reach your inbox before the comment period has ended.

Sincerely,
Libby Johnson
2127 Edwin Avenue
Durham, NC 27705

1/5-a

2/2-a
3/1-b

From: Victoria Joyce <victoriajoyce@me.com>
Sent: Tuesday, June 2, 2020 8:41 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] Pits - Public Comment

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.

Victoria Joyce
664 N M Street
Livermore CA 94551
310-927-3744

From: Kahn, Henry <hkahn@emory.edu>
Sent: Friday, May 29, 2020 8:52 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] comments on producing plutonium pits for nuclear weapon triggers at the Savannah River Site

Dear Ms Nelson,

I write you in the midst of a global pandemic that threatens the health of humans and the survival of our planetary economies.

The impacts to health and global survival are more grim today than at any point within memory. But it's not only the coronavirus that threatens us. It's also the prospect of engaging in nuclear warfare. Our nation, once rich with talent and material resources, has proven to be impoverished of both. The impact of producing more plutonium pits will be devastating to our principles. It will move us further away from finding solutions to the epidemic and economic catastrophes in our immediate future.

1/5-a

I write also as a Georgia physician living less than 3 hours by car from the Savannah River Site. The existing structures at SRS have already threatened my community. We don't need more of that pointless manufacturing so close to where millions of humans live. I fear, likewise, for the survival of non-human species at risk from by-products of plutonium refining and machining. Building a new bomb plant to make new plutonium pits is a provocative act; it will contribute to an escalation of the global nuclear arms race and will undermine US nonproliferation goals.

2/2-g

We don't need more plutonium pits; we need health care; we need a massive investment in safety and security against pandemics; we need protections for workers and businesses crushed by the economic collapse.

3/1-b

Sincerely yours,

Henry S Kahn, MD, FACP
Mobile: 404-310-3958

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET, SW
ATLANTA, GEORGIA 30303-3104

June 2, 2020

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

Re: EPA Comments on the Final Environmental Impact Statement for Plutonium Pit Production at the Savannah River Site in South Carolina; CEQ# 20200077

Dear Ms. Nelson:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement (DEIS) in accordance with Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act (NEPA). The National Nuclear Security Administration (NNSA), a semi-autonomous agency within the U.S. Department of Energy (DOE), is the lead agency for the proposed project. The project involves repurposing a Mixed-Oxide Fuel Fabrication Facility (MFFF) to produce a minimum of 50 war reserve pits per year at Savannah River Site (SRS) and developing the ability to implement a short-term surge capacity that enables NNSA to meet the requirements of producing pits at a rate of not less than 80 war pits per year beginning in 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.

The DEIS evaluates several reasonable alternatives. Two alternatives are advanced in the DEIS, including the No Action Alternative and the Proposed Action Alternative. The DEIS identifies repurposing the MFFF into the Savannah River Plutonium Processing Facility (SRPPF) as the preferred alternative. Under the No-Action Alternative, NNSA would not proceed with the SRPPF. The existing MFFF would remain unused and NNSA would utilize the capabilities at the Los Alamos National Laboratory to meet the Nation's long-term needs for pit manufacturing.

The EPA understands and appreciates the complexity and significance of DOE's mission to meet the national security policy requirements for producing plutonium pits. The EPA provides the following comments related to emergency preparedness and radiological impacts.

Testing the effectiveness of the SRS emergency response plan is important and requires a commitment from multiple organizations. The DEIS states in part that offsite state, local and private organizations that support the SRS emergency response plan may be invited to participate in exercises at least once every three years. Within a three-year period, modifications to facility standard operating procedures in addition to personnel turnover have the potential to affect the preparedness of the facility and coordination with the surrounding communities. The EPA recommends that offsite organizations

1/6-p.12

participate in SRS exercises on a more frequent basis (i.e., biennial), as a best practice. The EPA also recommends that the NNSA address potential radiological impacts with a statement about planned environmental monitoring and sampling for radionuclides in Section 4.4.1. The NNSA should provide a diagram showing the location of the radionuclide National Emission Standard for Hazardous Air Pollutant compliant monitor and any other ground or surface water sampling points.

2/6-c.1
3/6-d.2

The EPA appreciates the opportunity to work with DOE. If you wish to discuss our comments, please contact Mr. Larry Long of the NEPA Section at (404) 562-9460, or by email at long.larry@epa.gov.

Sincerely,

Ntale Kajumba
Chief, NEPA Section
Strategic Programs Office

From: Kevin Kamps <kevin@beyondnuclear.org>
Sent: Tuesday, June 2, 2020 11:55 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] 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

Ms. Jennifer Nelson
NEPA Compliance Officer, National Nuclear Security Administration
Savannah River Field Office, P.O. Box A, Aiken, South Carolina 29802
By email to NEPA-SRS@srs.gov

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:

We are 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.

1/4-f

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.

1/4-f
(Cont’d)

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.

2/3-b
3/3-a

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.

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?

6/6-1.7
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

5. The SRS Plutonium Bait and Switch

There is a need for a Programmatic Environmental Impact Statement (PEIS) to review all options across the U.S. Department of Energy complex, concerning plutonium pit production for nuclear weapons, including the option to not construct new facilities to produce pits at Savannah River Site (SRS) for the first time, and for expanded plutonium pit production at Los Alamos National Lab.

1/4-f
(Cont'd)

(Beyond Nuclear, on behalf of its members and supporters near SRS, and across the country, also wants to state clearly that we are adamantly opposed to plutonium pit production for nuclear weapons anywhere, anytime. This includes at Los Alamos National Lab -- not "just" the proposed expansion of plutonium pit production at LANL, but also current plans for plutonium pit production at Los Alamos.)

12/3-f.1

A bait and switch has been played on the American people. \$7 billion in hard-earned U.S. taxpayer money was wasted on the now abandoned MOX FFF (Mixed plutonium-uranium Oxide Fuel Fabrication Facility) at SRS. DOE and NNSA said one thing, and are now doing the opposite. The irony and hypocrisy is extreme, first claiming to be turning "Swords into Plowshares," in converting weapons-grade plutonium excess to military needs, into "Atoms for Peace" nuclear fuel for commercial electricity reactors, as a supposed non-proliferation program. But from the very beginning, anti-nuclear power critics of the MOX FFF scheme called Instead for Immobilization -- mixing the weapons-grade plutonium back into the high-level radioactive waste (HLRW) from which it came in the first place, and then treating the forever deadly HLRW re-mixed with weapons-grade plutonium as just that, to be ultimately disposed of at a deep geologic repository found suitable for such after having passed a long list of stringent legal, technical, and social acceptance criteria. So what is this current nuclear weapons plutonium pit production plan? Plowshares into Swords? Swords into Swords? The icing on the cake of irony and hypocrisy is the use of the MOX FFF facility itself for nuclear weapons plutonium pit production, for the first time ever at SRS. Swords into Plowshares transformed into Swords into Swords. The mendacity is on full display for all Americans and all the world to see.

13/2-h

6. Environmental Justice

The added environmental justice (EJ) burden of plutonium pit production for nuclear weaponry at SRS is unacceptable. The SRS region already hosts way too many radioactive risks. SRS itself is a very badly radioactively contaminated vast area.

14/6-o.3

But very nearby there is also a former national dump for so-called "low" level radioactive waste at Barnwell, SC. For decades, up until about a decade ago, Barnwell served as the dump-site for 39 states' "low" level radioactive wastes (LLRW). Since, three states still dump LLRWs there. The dump has long suffered leaks into the surrounding

community. A neighboring church yard had to be exhumed, to a deep depth, as LLRW, because the LLRW from Barnwell had reached and contaminated it via groundwater flow.

Also nearby are nuclear power plants, including Summer in South Carolina, and Vogtle in Georgia. Vogtle could become the largest single nuclear power plant in the country. It already has two large reactors. But two more reactors are under construction. "Just" the routine releases from Summer and Vogtle are bad enough (see: http://static1.1.sqspcdn.com/static//356087/26605366/1444852853757/BN_RoutineRadioactiveReleases_Oct2015.pdf?token=zwsUEXAvfOttAa88dOgh7qJ3NkE%3D), and could get worse with age-related degradation. Vogtle will also represent both extremes of the reactor risk spectrum – have breakdown phase increased risks at the Vogtle Units 1 and 2 reactors, combined with the break-in phase increased risks at the Vogtle 3 and 4 reactors, if they ever become operational (they are currently many billions of dollars over budget, and many years behind schedule, with challenges brought by Nuclear Watch South re: safety-significant ITAAC violations, and by Blue Ridge Environmental Defense League re: the nuclear island at Vogtle 3 dangerously sinking into the red Georgia clay. As BREDL's expert witness, nuclear engineer Arnie Gundersen of Fairewinds Energy Education, put it, "Islands are not supposed to sink." Such sinkage at the Midland nuclear power plant in Michigan led to the construction project's cancellation, even though one reactor was 90% complete, and the other was 50% complete. Billions of dollars were wasted on the cancelled Midland reactors, just as \$9 billion of ratepayer money was wasted on Vogtle's twin new build at Summer, Units 2 and 3, cancelled some years ago.)

14/6-o.3
(Cont'd)

Underscoring the EJ violations that plutonium pit production at SRS would represent, is the fact that communities like Shell Bluff, Georgia, and Burke County, GA, are majority people of color. Burke County, according to the 2010 U.S. Census, is 49.5% Black or African American, 0.3% Asian, 0.2% Native American, 0.1% Pacific Islander, 1.1% from some other race and 1.3% from two or more races; 2.6% are Hispanic or Latino (of any race). Thus, the majority of the population of Burke County are people of color.

There is also a significant poverty problem in Burke County, despite (because of?) the presence of so many nuclear power and nuclear weapons facilities in the immediate area. About 20.0% of families, and 25.7% of the population, were below the poverty line, including 38.0% of those under age 18, and 16.2% of those age 65 or over. (Citation: ["DP03 SELECTED ECONOMIC CHARACTERISTICS – 2006-2010 American Community Survey 5-Year Estimates". United States Census Bureau. Archived from the original on February 13, 2020. Retrieved December 27, 2015.](#))

7. Unprecedented Plutonium Pit Production at SRS Would Harm Our National Security and Put It at Risk

Another aspect of this unacceptable scheme that must be addressed in a PEIS is its harm and risk to our national security. Beginning with a 2007 *Wall Street Journal* op-ed, the "Four Horsemen of the Nuclear Apocalypse" -- former Secretaries of State Henry Kissinger and George Schultz, former Defense Secretary William Perry, and former U.S. Senator Sam Nunn -- warned about the existential threat to the U.S. from nuclear weapons in the hands of state enemies and even terrorist groups. They have since repeatedly called for abolition of nuclear weapons worldwide, as an essential safeguard of U.S. national security. If even "nuclear hawks" like Kissinger and Schultz fear the existential threat to the U.S. from the continued existence of nuclear weapons, DOE/NNSA and U.S. government policy makers, at the highest levels, should take heed, before it is too late. This unprecedented plutonium pit production plan at SRS, and its expansion at Los Alamos (as well as current plutonium pit production plans at LANL),

15/2-c

flies in the face of such dire warnings as that repeated since 2007 by the "Four Horsemen of the Nuclear Apocalypse."

15/2-c
(Cont'd)

The example set and message sent by this plutonium pit production commencement at SRS, and its expansion at LANL (as well as current plutonium pit production plans at LANL), increases the risk of nuclear weapons proliferation worldwide. This represents an increasing risk of actual nuclear warfare taking place, which could prove omnicidal.

There is increased environmental risk to SRS's and LANL's environs out to a great distance, not just from routine operations, but also from the potential for a catastrophic release of ultra-hazardous plutonium onto the winds and waters.

1/4-f
(Cont'd)

As mentioned above, there is high risk -- actually a guarantee -- of violating EJ principles.

Under standard National Environmental Policy Act (NEPA) parlance, these are LARGE impacts. They should be treated as such in a comprehensive PEIS, not given short shrift by this slapdash, shallow, half-baked Draft EIS.

And what about the Treaty on the Prohibition of Nuclear Weapons, also known as the Nuclear Weapon Ban Treaty? 37 state parties have already ratified it in less than three years. There are already a total of 81 state party signatories as well. If just 13 more state party signatories ratify this treaty, it will enter into the force of international law. The United States, and other countries possessing nuclear weapons, will be rogue nations, violating international law. This plutonium pit production programs at LANL (now proposed for expansion) and SRS (now proposed for the first time ever) would be yet another violation of that impending treaty. In that sense, the plutonium pit production plans, current and potential/proposed, undermine our standing in the world.

And what about the 50-year old Nuclear Non-proliferation Treaty, the NPT? As posted online here <https://www.un.org/en/conf/npt/2005/npttreaty.html>, Article VI of the NPT states:

Article VI

Each of the Parties to the Treaty undertakes to pursue negotiations in good faith on effective measures relating to cessation of the nuclear arms race at an early date and to nuclear disarmament, and on a treaty on general and complete disarmament under strict and effective international control.

16/2-a

The LANL/SRS plutonium pit production expansion/commencement schemes (as well as current plans for plutonium pit production at LANL) fly in the face of the U.S.'s 50-year old NPT Article VI commitments. As a signatory of the NPT, the U.S. would again compound its violation of this treaty -- binding international law -- by pursuing this plutonium pit production expansion plan at LANL, as well as current such plans at LANL, and also unprecedented SRS plutonium pit production plans for nuclear weaponry. And as the U.S. Constitution states, treaties are the highest law of the land, equal in stature to the U.S Constitution itself.

The Energy Secretary, and the NNSA Administrator, have sworn an Oath of Office that states:

I do solemnly swear (or affirm) that I will support and defend the Constitution of the United States against all enemies, foreign and domestic; that I will bear true faith and allegiance to the same; that I take this obligation freely, without any mental reservation or purpose of evasion; and that I will well and faithfully discharge the duties of the office on which I am about to enter: So help me God.

16/2-a
(Cont'd)

Since treaties are the highest law of the land, equal in stature to the U.S. Constitution itself, this means that the NPT commitments of the U.S. must be met. Plutonium pit production expansion at LANL (as well as current plutonium pit production plans at LANL), and its commencement at SRS, flies in the face of that.

And since plutonium pit production expansion at LANL, and its commencement at SRS, is connected to new weapons designs, this raises the specter of renewed nuclear weapons testing at the Nevada National Security Site (NNSS, formerly known as the NTS, Nevada Test Site). But the NTS's establishment in 1951, and nuclear weapons testing and other activities there ever since, is a flagrant violation of the Treaty of Ruby Valley of 1863, which the U.S. entered into with the Western Shoshone Indian Nation. Given the further violation of this highest law of the land, equal in stature to the U.S. Constitution itself, any planning regarding renewed nuclear weapons testing at the NNSS, located on Western Shoshone lands (Newe Sogobia in Shoshone language), must cease and desist immediately, before it starts. The Trump administration's recent threat to restart full-scale nuclear weapons testing at the NNSS/NTS, for the first time since September 1992, as reported by the *Washington Post* on May 22, 2020, raises profound, dire alarm bells.

17/2-d

18/2-f

The same logic applies to any notion of dumping any radioactive wastes from LANL or SRS at the NNSS. As NNSS is located on Western Shoshone land (the Western Shoshone land title affirmed by treaty right), DOE/NNSA have no right to dump radioactive waste there. This includes any wastes generated by expanded plutonium pit production at LANL (as well as currently planned pit production at LANL), or its commencement at SRS. But it also applies to any dumping of irradiated nuclear fuel, or high-level radioactive waste, associated with the reactor-production and reprocessing of weapons-grade plutonium in the first place, as at Yucca Mountain, Nevada, located on the edge of the NNSS, also on Western Shoshone treaty lands.

18/2-f
(Cont'd)

The 75th annual commemorations of Trinity, Hiroshima, and Nagasaki will take place this July 16, August 6, and August 9, respectively. Such environmental injustice, and genocidal nuclear weapons use, must never happen again. That's one reason why expanded plutonium pit production at LANL (as well as current plans for plutonium pit production at LANL), and its commencement at SRS, must not go forward.

19/5-a

As the Hibakusha, the survivors from the U.S. atomic bombings of Hiroshima and Nagasaki, Japan, have pleaded for 75 long years, what happened to them and their families can never be allowed to happen again. And yet expanded plutonium pit production at LANL (as well as current such plans there), and its commencement at SRS, would increase the risk of nuclear war happening again.

The Hibakusha, in the person of Setsuko Thurlow, a survivor of the Hiroshima atomic bombing, who was 13 years old when it happened, shared the 2017 Nobel Peace Prize with the International Campaign to Abolish Nuclear Weapons, for their advocacy for the Treaty on the Prohibition of Nuclear Weapons, mentioned above.

The Kings Bay Plowshares Seven, scheduled to be sentenced soon for their non-violent civil disobedience action in Georgia dedicated to the memory of the Reverend Doctor Martin Luther King, Jr., invoked the prophecy of Isaiah:

And he shall judge among the nations, and shall rebuke many people: and they shall beat their swords into plowshares, and their spears into pruning hooks: nation shall not lift up sword against nation, neither shall they learn war any more. (Isaiah 2:4).

Some of the Kings Bay Plowshares Seven are scheduled for sentencing this month. Their non-violent civil disobedience action took place on April 4, 2018 -- the 50th annual commemoration of the assassination of the Rev. Dr. MLK, Jr. The action was dedicated to addressing the "triple evils," as identified by MLK in 1967: "[T]he evil of racism, the evil of poverty, and the evil of war."

The EJ burdens mentioned above include the environmental injustice of radioactive racism, which would be exacerbated by expanded plutonium pit production at LANL (just as current plans for plutonium pit production there violate EJ), and its commencement at SRS.

The expenditure of billions of dollars of hard-earned U.S. taxpayer money for expanded plutonium pit production at LANL (as well as currently planned plutonium pit production there), and brand new pit production at SRS, would exacerbate the evil of poverty. As President Eisenhower put it, "Every gun that is made, every warship launched, every rocket fired signifies, in the final sense, a theft from those who hunger and are not fed, those who are cold and are not clothed." The Covid-19 pandemic is making the evil of poverty and disparity plain for all to see. Expanded plutonium pit production at LANL (as well as current plans there for such), and new plutonium pit production at SRS, does not address this current pandemic, nor the next pandemic, nor countless other health and wealth disparities in this country.

The following historic marker stands in St. Mary's Park, in downtown Monroe, Michigan, on the banks of the River Raisin. Monroe County "hosts" the dangerous and controversial Fermi nuclear power plant, the original plan for which, at Fermi Unit 1 (which suffered a partial meltdown on October 5, 1966), included plutonium generation for nuclear weaponry, and even high-level radioactive waste generation for radiological dispersal devices (also known as dirty bombs). The sign reads:

DR. MARTIN LUTHER KING, JR.

(1929-1968)

The words of Dr. Martin Luther King, Jr.

"If you are cut down in a movement that is designed to save the soul of a nation, then no other death could be more redemptive. We must somehow believe that unearned suffering is redemptive. We must work passionately and indefatigably to bridge the gulf between our scientific progress and our moral progress. One of the great problems of mankind is that we suffer from a poverty of the spirit which stands in glaring contrast to our scientific and technological abundance. The richer we have become materially, the poorer we have become morally and spiritually."

The "host" communities of Los Alamos and New Mexico, as well as SRS and South Carolina, with Georgia right across the Savannah River, should not be blinded by radioactive dollar signs. The Faustian fission of deterrence is another false idol being worshipped, at all of our peril as inhabitants of planet Earth.

Speaking of Mother Earth, just a month and a half after the 50th anniversary of Earth Day, and just three weeks after Mother's Day, it is good to remember the words of Mother's Day's feminist peace activist founder, Julia Ward Howe.

Here are the words of her original Mother's Day Proclamation:

Mother's Day Proclamation, 1870

By Julia Ward Howe

Arise, then, women of this day!

Arise, all women who have hearts, Whether our baptism be of water or of tears!

Say firmly: "We will not have great questions decided by irrelevant agencies, Our husbands will not come to us, reeking with carnage, for caresses and applause. Our sons shall not be taken from us to unlearn All that we have been able to teach them of charity, mercy and patience. We, the women of one country, will be too tender of those of another country To allow our sons to be trained to injure theirs."

From the bosom of the devastated Earth a voice goes up with our own. It says: "Disarm! Disarm! The sword of murder is not the balance of justice." Blood does not wipe out dishonor, nor violence indicate possession. As men have often forsaken the plough and the anvil at the summons of war, Let women now leave all that may be left of home for a great and earnest day of counsel.

Let them meet first, as women, to bewail and commemorate the dead. Let them solemnly take counsel with each other as to the means Whereby the great human family can live in peace, Each bearing after his own time the sacred impress, not of Caesar, But of God.

In the name of womanhood and humanity, I earnestly ask That a general congress of women without limit of nationality May be appointed and held at someplace deemed most convenient And at the earliest period consistent with its objects, To promote the alliance of the different nationalities, The amicable settlement of international questions,

The great and general interests of peace.

Plutonium pit production expansion at LANL (as well as current plans for such there), and its commencement at SRS, violates Julia Ward Howe's peaceful vision for the establishment of Mother's Day, and threatens Mother Earth. These plans must be stopped, for the sake of peace, people, and the planet.

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

Sincerely,

Kevin Kamps, Radioactive Waste Specialist,

and Kay Drey, President of the Board of Directors,

Beyond Nuclear
7304 Carroll Avenue, #182
Takoma Park, Maryland 20912

Cell: (240) 462-3216

kevin@beyondnuclear.org
www.beyondnuclear.org

Beyond Nuclear aims to educate and activate the public about the connections between nuclear power and nuclear weapons and the need to abolish both to safeguard our future. Beyond Nuclear advocates for an energy future that is sustainable, benign and democratic.

From: Michael J Keegan <mkeeganj@comcast.net>
Sent: Tuesday, June 2, 2020 10:50 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Cc: mkeeganj <mkeeganj@comcast.net>
Subject: [EXTERNAL] Comments of Don't Waste Michigan in Opposition to Plutonium Pit Production Proposed for SRS in the Draft EIS

Comments of Don't Waste Michigan in Opposition to Plutonium Pit Production Proposed for SRS in the Draft EIS

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

Dear Ms. Nelson,

Don't Waste Michigan is compelled to enter into the record at this time the Principles of the Nuremberg Tribunal. Don't Waste Michigan would add that what is being contemplated with Plutonium Pit proposal impacts future generations, and in doing so should be considered as an additional Crimes Against Future Generations. Please enter into the record these Principles of the Nuremberg Tribunal.

Principles of the

Nuremberg Tribunal, 1950

No. 82

Principles of International Law Recognized in the Charter of the Nuremberg Tribunal and in the Judgment of the Tribunal. Adopted by the International Law Commission of the United Nations, 1950.

Introductory note: Under General Assembly Resolution 177 (II), paragraph (a), the International Law Commission was directed to "formulate the principles of international law recognized in the Charter of the Nuremberg Tribunal and in the judgment of the Tribunal." In the course of the consideration of this subject, the question arose as to whether or not the Commission should ascertain to what extent the

principles contained in the Charter and judgment constituted principles of international law. The conclusion was that since the Nuremberg Principles had been affirmed by the General Assembly, the task entrusted to the Commission was not to express any appreciation of these principles as principles of international law but merely to formulate them. The text below was adopted by the Commission at its second session. The Report of the Commission also contains commentaries on the principles (see Yearbook of the International Law Commission, 1950, Vol. II, pp. 374-378).

Authentic text: English Text published in Report of the International Law Commission Covering its Second Session, 5 June-29 July 1950, Document A/1316, pp. 11-14.

Principle I

Any person who commits an act which constitutes a crime under international law is responsible therefor and liable to punishment.

Principle II

The fact that internal law does not impose a penalty for an act which constitutes a crime under international law does not relieve the person who committed the act from responsibility under international law.

Principle III

The fact that a person who committed an act which constitutes a crime under international law acted as Head of State or responsible Government official does not relieve him from responsibility under international law.

Principle IV

The fact that a person acted pursuant to order of his Government or of a superior does not relieve him from responsibility under international law, provided a moral choice was in fact possible to him.

Principle V

Any person charged with a crime under international law has the right to a fair trial on the facts and law.

Principle VI

The crimes hereinafter set out are punishable as crimes under international law:

- a. Crimes against peace:
 - i. Planning, preparation, initiation or waging of a war of aggression or a war in violation of international treaties, agreements or assurances;
 - ii. Participation in a common plan or conspiracy for the accomplishment of any of the acts mentioned under (i).
- b. War crimes:

1/5-a
(Cont'd)

Violations of the laws or customs of war which include, but are not limited to, murder, ill-treatment or deportation to slave-labor or for any other purpose of civilian population of or in occupied territory, murder or illtreatment of prisoners of war, of persons on the seas, killing of hostages, plunder of public or private property, wanton destruction of cities, towns, or villages, or devastation not justified by military necessity.

c. Crimes against humanity:

Murder, extermination, enslavement, deportation and other inhuman acts done against any civilian population, or persecutions on political, racial or religious grounds, when such acts are done or such persecutions are carried on in execution of or in connection with any crime against peace or any war crime.

Principle VII

Complicity in the commission of a crime against peace, a war crime, or a crime against humanity as set forth in Principles VI is a crime under international law.

Please accept these Comments as articulated above on behalf of Don't Waste Michigan.

Please do add Crimes Against Future Generations to these Comments on Plutonium Pit Production.
Thank you.

In Earnest,

Michael J. Keegan,
Co-Chair
Don't Waste Michigan
Monroe, MI

1/5-a
(Cont'd)

Tri-Valley CAREs

Communities Against a Radioactive Environment

4049 First St., Suite 243, Livermore, CA 94551 • (925) 443-7148 • www.trivalleycares.org



*Peace Justice Environment
since 1983*

June 2, 2020

Ms. Jennifer Nelson
NEPA Compliance Officer,
National Nuclear Security Administration
Savannah River Field Office,
P.O. Box A, Aiken, South Carolina 29802
By email to NEPA-SRS@srs.gov

Re: Public Comment on the Draft Environmental Impact Statement (DEIS) for Plutonium Pit Production at the Savannah River Site in South Carolina, DOE/EIS-0541

Dear Ms. Nelson:

Tri-Valley CAREs is a non-profit organization founded in 1983 by Livermore, California area residents to conduct research, analysis, public education and advocacy regarding the potential environmental, health and proliferation impacts of the U.S. nuclear weapons complex, including but not limited to its Lawrence Livermore National Laboratory. In its capacity as a nuclear weapons complex “watchdog” organization, Tri-Valley CAREs is submitting substantive comments regarding the draft Environmental Impact Statement (DEIS) for Plutonium Pit Production at the Savannah River Site (SRS) in South Carolina.

We request every comment contained herein be recorded and responded to in the final EIS and that NNSA identify best available control measures to mitigate all environments impacts.

I. The Flawed Public Process Must be Remedied

The decision by NNSA to conduct and conclude this public comment period during a time of national emergency (the Covid-19 pandemic), stay-at-home-orders, and while people’s lives are disrupted in unprecedented ways circumvents the ability of the public to meaningfully comment on this DEIS. An extension of only 15 days, still during stay-at-home orders, did little to alleviate the hardship on interested parties. Making thoughtful, and thorough comments on this complicated topic and lengthy document, one that relies on other lengthy documents, has been very difficult in the allotted time.

Additionally, it has been uniquely difficult for interested parties to communicate with subject matter experts on specific applicable topics during this stay-at-home period because they are not in their offices and are hard, sometimes impossible, to reach. This amounts to a violation of NEPA’s

1/4-a

requirement that agencies make “efforts to provide meaningful public involvement in their NEPA processes.” CEQ NEPA Regulations, 40 C.F.R. §§ 1501.4(b), 1506.6(b).

For comparison, the NRC provided a sixty-day extension to the comment period for the EIS for the Holtec International proposed interim storage facility given the troubling circumstance brought on by the COVID-19 public health emergency.

The extension period for public comment on this DEIS should be for at least sixty-days following an announcement in the Federal Register, if not longer, given the current circumstances.

II. Necessity for a Programmatic Environmental Impact Statement under NEPA

The National Nuclear Security Administration’s (NNSA) plan to expand U.S. plutonium pit production to between 80 – 125 (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 documents list 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. (Two other NEPA reviews of the connected actions are each limited to a more cursory ‘Supplement Analysis’) As an overall matter, these obviously connected actions must be analyzed together with the “hard look” provided by an EIS. Prior to issuing a final EIS on the Savannah River Site, a comprehensive nationwide review of all of the interlocking sites and risks involved in this program, including transportation, should be prepared.

The best way to meet the legal requirements of NEPA would be to complete a Programmatic Environmental Impact Statement (PEIS) that outlines the nation-wide proposal to expand plutonium pit production. The agency decision to go with a Supplement Analysis and amended Record of Decision on a 2008 PEIS is insufficient given the substantial change in circumstances, among other reasons.

Moreover, it is stated that both production sites (LANL and SRS) would be working simultaneously to meet certain production goals. The DEIS states that in the event of the no-action alternative, production will be met solely by LANL. This clearly suggests that the two proposals are connected as part of a “larger action,” the effects of such a proposal must be “considered in a single impact statement.” §1508.25(3).

III. The DEIS’ Analysis of Alternatives is Inadequate

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

1/4-a
(Cont’d)

2/4-f

3/1-g

storage. The final EIS must analyze an alternative scenario in which the agency foregoes any new-design pits. How many newly produced pits would be needed by 2030 (the due date for both the new bomb plant and the W87-1 warhead) if not for new design pits? Instead the DEIS fails to provide adequate information on this this issue.

3/1-g
(Cont'd)

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 EIS 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.

4/3-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. New warhead designs using novel plutonium pits further introduces the potential for resumption of nuclear explosive testing at the test site in Nevada, an activity that was halted 1992. Such testing could involve considerable environmental impacts and international proliferation consequences that need to be analyzed in the final EIS.

5/2-b
6/2-c

IV. The DEIS' Analysis of the Impact of Wastes is Inadequate

Pit production at SRS 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 has 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.

7/6-j

Additionally, past pollution should be remedied before new wastes are heaped on top of preexisting impacts from past programs. This fundamental issue is not fully addressed in the DEIS. Indeed, pit production could distract from the main mission of the Savannah River Site and its largest amount of funding, which is, cleaning up tens of millions of gallons of waste products left over from past production of plutonium and nuclear weapons materials at the site.

V. 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.

8/2-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. EIS should also identify any and all known pollutants that might be hazardous to people, other life forms, and the environment.

9/6-1.2

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?

9/6-1.2
(Cont'd)
10/6-1.7
11/6-k.3

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.

12/6-p.1

VI. Surge Capacity

The DEIS explains that the facility will have a “surge capacity” or “short-term surge capacity” that will enable the facility to build additional pits, up to 125 per year. The draft document fails to define the terms “surge capacity” or “short-term surge capacity.” These are terms with which the general public has no experience, and this makes public analysis of the proposal at hand difficult. Please clarify what these terms mean.

Additionally, please provide details of how the agency will determine what conditions merit ordering the “surge.” For example, it is likely that pit production will lag behind schedule. Is falling behind on a weapon’s schedule due to internal agency conditions a sufficient reason for ordering a “surge” in capacity?

Also please describe in more detail the differences between operating at a surge capacity compared to how the conditions will be at the 50 or 80 pits per year level. For example, will the additional employees (which the DEIS indicates will be 520 over the 80 pits per year level) be temporary employees? Will they be trained to the same level? Will they come from other sites? Will safety or oversight be relaxed during these “surge” periods? How long are the surge periods expected to last? How often will the “need” for the surge be evaluated? Will the DNFSB be notified of the surge beforehand? Will DNFSB approval of the safety of the surge plan and its additional equipment be required before the surge is allowed to begin? How will the determination be made to end the surges?

13/3-i

Furthermore, additional waste of all types will be produced during these surge periods. Will the agency store waste (of all types) on site for longer periods of time during surges? Will there be a difference in the transport of waste during surge, i.e. more waste per shipment or more frequent shipments? Will onsite waste treatment capacity correspondingly surge? Will WIPP be given notice in order to prepare for the increase in TRU waste? How will the fact that WIPP is oversubscribed (and may not be available) be factored in?

VII. The DEIS Analysis of Intentional Destructive Acts is Inadequate

The potential destructive acts that could result from various terrorist or disgruntled employee incidents at the proposed facility are not adequately analyzed. The DEIS is heavily reliant on past NEPA reviews. Yet, the analysis provided by all previously relied upon NEPA documents is out of date given the rapid rate of technological innovation available to terrorists as well as ever changing potential terrorist

14/6-1.1

targets and threats. The final EIS must consider various scenarios (committed by both external and internal actors).

At a minimum, these situations should be analyzed in a similar fashion to the transportation accident analysis; where a range of high-probability, low risk and low-probability, high-risk scenarios were disclosed and discussed. For example, the final EIS should include an analysis of an employee or an intruder obtaining and removing plutonium from the site and then a non-state actor using it to detonate a dirty weapon or crude bomb in a nearby American city such as Charlotte or Atlanta.

This analysis would not be limited to probability analyses of the likelihood of such and incident. Rather the requirement is for an actual analysis of the potential environmental and human impact from such an intentional destructive act.

The DEIS states "If the proposed SRPPF and support facilities were used to produce 125 pits per year, the material at-risk and source term would not change compared to the 50 to 80 pit per year capacity SRPPF." (at 4.11.2) This assertion summarily concludes that there is no additional risk posed from an accident or intentional destructive act during the surge periods. However, there is nothing offered to back this up. Other parts of the DEIS acknowledge the increase in waste, an increase in number of workers, and other risk factors that would increase the impact of an intentional destructive act, thereby requiring a more thorough analysis.

Additionally, the ability for vehicles to drive right up to the facility increases the potential for an intentional destructive act or accident at the facility involving a vehicle (such as a fire). The necessity for employee parking in such close proximity to the site should be analyzed more closely. An alternative that includes a remote parking lot with employee busing to the site should be analyzed. These concerns would be compounded during periods of surge production, particularly if a temporary or otherwise changed labor force were required to meet production goals.

Please acknowledge receipt of our comments. Thank you in advance for considering these comments and for responding to them substantively in the final EIS.

Sincerely,

Marylia Kelley
Executive Director

Scott Yundt
Staff Attorney

Angad Gangapuram
Summer Legal Intern

14/6-1.1
(Cont'd)

From: Marvin Lare <marvinlare@gmail.com>
Sent: Monday, May 25, 2020 9:58 AM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] Plutonium Pits and SRS

884 Allen's Way
Columbia, SC 29205
803-779-9881
Cell: 803-466-7730

Marvin I. Lare

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

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.

As a citizen of the United States and South Carolina, 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:

1. 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.
2. 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.
3. The focus at SRS must remain on cleaning up nuclear and chemical waste from production of nuclear weapons materials that still pose environmental and health hazards at the site.
4. 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.

1/5-a

2/6-j.6

3/6-j.8

4/2-g

5. 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.

5/3-a

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

6/3-g

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?

7/6-j.2

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.

8/3-j

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.

9/4-f

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.

[SIGNED]

(Rev.) Marvin I. Lare, M.Th. (Retired)
South Carolina Conference
The United Methodist Church
604 Allen's Way
Columbia, SC 29205

From: dennispbvm@aol.com <dennispbvm@aol.com>
Sent: Sunday, May 31, 2020 10:22 AM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] Savannah River Site in South Carolina bomb plant

Dear Ms. Nelson:

I am writing to oppose plutonium pit production at the Savannah River Site in South Carolina—the No Action Alternative in the Draft EIS. In addition, I believe the NNSA must complete a new Programmatic EIS before it can prepare a site-specific Environmental Impact Statement. The PEIS must fully analyze the reuse of the 15,000+ plutonium pits in storage at Pantex before it embarks on a dangerous, multi-billion dollar plan to build an unnecessary new bomb plant.

I live in Knoxville, Tennessee and have been actively engaged with the Oak Ridge Environmental Peace Alliance for 30 years. At this time I have been in Iowa since March 2, 2020 because of the Covid 19. I am grateful for the opportunity to express my concerns regarding nuclear weapon production

Sincerely, Mary Dennis Lentsch PBVM

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

From: Sherry Lewis <sherry.lewis66@icloud.com>
Sent: Saturday, May 30, 2020 5:26 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] Draft SRS Pit Production EIS Comment

I thought we were done making nuclear weapons. This is a new world where nuclear warfare is no longer an option. It is a terrible waste of money and resources better used to make life worth living for all the people we already have in this world. Don't be so short-sighted.

we don't need more plutonium pits; we need health care; we need a massive investment in safety and security against pandemics; we need protections for workers and businesses crushed by the economic collapse. We DON'T need more plutonium pits.

Thank you and sincerely,

Sherrill Ames Lewis
209 Longview Lane
San Luis Obispo CA
93405

Sent from my iPhone

1/5-a
2/1-b

From: David Linge <dlinge@bellsouth.net>
Sent: Saturday, May 30, 2020 5:36 AM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] plutonium pit production

Dear Ms. Nelson:

I am writing to oppose plutonium pit production at the Savannah River Site in South Carolina—the No Action Alternative in the Draft EIS. In addition, I believe the NNSA must complete a new Programmatic EIS before it can prepare a site-specific Environmental Impact Statement. The PEIS must fully analyze the reuse of the 15,000+ plutonium pits in storage at Pantex before it embarks on a dangerous, multi-billion dollar plan to build an unnecessary new bomb plant.

Sincerely,

Dr. David E. Linge

Knoxville,

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

From: JoAnne Lingle <jalingle@earthlink.net>
Sent: Saturday, May 30, 2020 11:28 AM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] I oppose plutonium pit production at the Savannah River Site

Dear Ms. Nelson:

I am writing to oppose plutonium pit production at the Savannah River Site in South Carolina—the No Action Alternative in the

1/5-a

Draft EIS. In addition, I believe the NNSA must complete a new Programmatic EIS before it can prepare a site-specific Environmental

2/4-f

Impact Statement.

The PEIS must fully analyze the reuse of the 15,000+ plutonium pits in storage at Pantex before it embarks on a dangerous, multi-billion

3/1-b

dollar plan to build an unnecessary new bomb plant.

Sincerely,

JoAnne Lingle

JoAnne Lingle

3016 N Arlington Ave.

Indianapolis IN 46218

From: Jon Lipsky <jon@jonlipsky.com>
Sent: Sunday, May 31, 2020 6:58 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] Draft SRS Pit Production EIS-0541

Ms. Jennifer Nelson
NEPA Compliance Officer, NNSA
Savannah River Field Office
PO Box A
Aiken, SC 29802

Ms. Nelson,

The purpose of this communication is to file formal comments concerning captioned matter for (2) No Action, with submission date extended to June 2, 2020. (Bruce M. Diamond letter to Tom Clements, April 21, 2020). I am aware of USDOE's PII policy and do not request withholding my personal identifying information along with my communication to be included with the entire public record.

Reference my email to you regarding SRS Pit Production dated July 25, 2019; your email dated January 21, 2020; and, NNSA Summary of "Draft Environmental Impact Statement for Plutonium Pit Production at the Savannah River Site in South Carolina" (DOE/EIS-0541) dated April 2020.

The above captioned Summary requires that USDOE is responsible for the scope, accuracy and "to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man." (Pub. L. 91-190 at 42 USC 4321).

Summary at S.1.1 Relevant History —Pit Production

USDOE decision to not restart pit production at Rocky Flats prominently involved legal issues to not restart pit production.

On September 21, 1989 Rockwell International, the contract operator at Rocky Flats, filed its lawsuit in US District Court for the District of Columbia, case number 1:89-cv-02607-LFO: **The thrust of Rockwell's decision to sue USDOE, USDOJ and USEPA was US nuclear weapons complex-wide: "The complaint alleges that Plant operations generate "low level mixed wastes" (LLMW) that include both hazardous wastes such as solvents that are subject to EPA's land disposal restrictions. "Compliance with the land disposal restrictions is currently impossible. [emphasis added]. Because these wastes are radioactive, no existing DOE or commercial facility can or will treat the wastes so as to lower the concentrations of their non-radioactive hazardous constituents. This problem is not one which is limited to the (Rocky Flats) Plant, but pertains to LLMW generated at all DOE facilities . . . Rockwell's performance of the contract will necessarily result in the continued production and storage of LLMW," yet DOJ and EPA allege that such production is illegal." (Rockwell; 1989; pp 3-4).**

1/2-i

In response, USDOE terminated Rockwell's contract at Rocky Flats on September 22, 1989. EG&G Rocky Flats, Inc., replaced Rockwell as the Rocky Flats contract operator that attempted to manufacture pits but also determined that Rocky Flats could not be legally operated in 1990.

In June 1992 a US District Court Judge for the District of Colorado accepted a plea agreement in re USA v. Rockwell International Corporation, case number 92-cr-107. Rockwell pled guilty to four felonies and six misdemeanors for certain activities and operations at Rocky Flats. In Counts 9 and 10, regarding spray irrigation, Rockwell pled guilty to bypassing its National Pollutant Discharge Elimination System (NPDES) permit that caused pollutants to discharge offsite. Rocky Flats attempted to treat about 70-80 million gallons per year during the charged conduct and the resulting discharge polluted two (2) separate drinking water supplies. USDOE paid Broomfield about \$100 million to replace its drinking water source and compensated Northglenn, Thornton and Westminster millions of dollars to control Rocky Flats runoff away from its drinking water supply. The two (2) drinking water reservoirs have not been remediated nor does USDOE intend to remediate.

The referenced EIS-0541 and previous NNSA /USDOE plans fail to adequately inform the public about pit production that generates voluminous amounts of aqueous wastes comprised of hazardous wastes (solvents) mixed with radioactive wastes including weapons-grade plutonium-239 and tritium. In September 1989 USEPA included Rocky Flats on the National Priority List (NPL) of the worst Superfund sites. Not just the Rocky Flats industrial area was and continues to be contaminated but the Buffer Zone and tens of thousands of offsite acres. The Rocky Flats legacy is to not remediate the Buffer Zone (now Rocky Flats National Wildlife Refuge, right-of-way (P. Law 107-107) and offsite land for public use. In 2019 a historic 'hot particle' of weapons-grade plutonium-239 was located in the right-of-way corridor described as 264 pCi/g, 8.8 microns and respirable.

1/2-i
(Cont'd)

In re Marilyn Cook v. Dow Chemical, Rockwell International and Boeing, case number 90-cv-00181-JLK, US District Court for the District of Colorado settled in May 2016. The Cook case was a class action federal civil case, involving approximately 15,000 claimants, that sued former Rocky Flats contract operators Dow Chemical and Rockwell International for nuisance and trespass of weapons-grade plutonium-239 being deposited on their offsite properties. The trial jury found, in part, that weapons-grade plutonium-239 would remain on claimants property indefinitely. The US taxpayers paid for the settlement, \$375 million, and at least \$100 million in attorney fees to defend Dow Chemical.

USDOE by virtue of its EIS-0541 has not publicly resolved the lawful disposal of vast amounts of aqueous mixed hazardous and radioactive wastes, the application of land disposal restrictions (LDR) to mixed wastes and the lawful handling of contaminated recycled water: will the public be enlightened and provided appropriate public comment periods before implementation of Plutonium Pit Production at SRS and LANL to resolve these issues?

What steps will USDOE take to ensure that SRS and LANL will not become another USDOE crime scene; will not violate federal, state and local laws; and, be protective of human health and the environment?

Summary at S.1.2.1 Pit Aging and Pit Lifetime

Pit Aging and Pit Lifetime are USDOE fallacies without disclosing the necessary known maintenance cycles and generation/treatment/storage and disposal of hazardous and radioactive aqueous wastes that does not prevent or eliminate damage to human health and the environment.

2/1-c

The Pit module includes weapons-grade plutonium-239, tritium and the highly toxic beryllium. The Pit maintenance cycle ostensibly involves removing Pu-241 (short half-life) and replacing tritium. Pu-241 and its highly toxic decay product - Am-241 - involves solvents for removal that USDOE describes as a low level radioactive and hazardous aqueous waste stream. Tritium also has a short half-life that requires disposal without adversely effecting adjacent community drinking water supplies.

3/6-j.10
4/6-j.11
5/6-k.2
6/1-c
7/3-j
8/6-j.12
9/6-m.2
10/6-j.13

USDOE has accumulated a disastrous record regarding the Energy Employees Occupational Illness Compensation Program Act of 2000 (EEOICPA) when nuclear workers make lawful claims. (P. Law 116-92). Nuclear workers have been denied claims because USDOE is unable to verify employment, lost or destroyed personnel records, or incomplete personnel assignment records.

Will USDOE enlighten and provide appropriate public comment periods before implementation of Plutonium Pit Production at SRS, LANL or any other site that 1) USDOE acknowledges that it is also regulated by the Resource Conservation and Recovery Act; 2) protect nuclear workers and the EEOICPA process; 3) that the NEPA process undertaken by USDOE will be lawful, protect human health and the environment; 4) that the Pit maintenance process will be disclosed by USDOE and allow the public to vet and comment on the insidious Pit Aging and Pit Lifetime characterizations; 5) USDOE will not utilize structures with an applied variance but a structure built specifically for Plutonium Pit Production; 6) USDOE will truthfully characterize its maintenance of mixed waste characterizations for appropriate and regulated storage and disposal protective of human health and the environment; 7) USDOE will cease Plutonium Pit Production when lawful storage and disposal is not available; 8) involving offsite shipments of nuclear waste USDOE will provide advanced disclosure sufficient for State regulatory consideration and approval (unlike what was learned in July 2019 in Nevada); and, 9) when the appropriate time-frame is determined for site clean-up that USDOE will refrain from leading a prepermitted clean-up instead provide for an Independent Verification for the clean-up with public comment and involvement?

Finally, will USDOE seriously consider implementing a Citizens' Federal Advisory Committee Act - Advisory Board - regarding the intended Plutonium Pit Production activities and operations? (P. Law 92-463 and as amended).

Respectfully,

Jon Lipsky, MAS and FBI Retired
PO Box 2492
Longmont, CO 80502.

3/6-j.10
4/6-j.11
5/6-k.2
6/1-c
7/3-j
8/6-j.12
9/6-m.2
10/6-j.13

(Cont'd)

11/8-b

From: Ross Lockridge <murlock@raintreecounty.com>
Sent: Tuesday, June 2, 2020 3:36 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] Comment Opposed to Plutonium Pit Production Proposed for SRS in the Draft EIS

June 1, 2020

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,

I agree with many that the proposed Plutonium Pit Production Factory planned for the Savannah River Site (SRS) is both unnecessary and dangerous.

It is especially dangerous under the current fascistic leadership.

I too know that the Cold War ended long ago. And I know that 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.

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.

1/5-a

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.

4/2-g

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.

6/4-c

**Plutonium immobilization
NOT plutonium re-creation!**

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.

Sincerely,

Ross Lockridge
POB 22
Cerrillos, NM 87010

6/4-e
(Cont'd)

From: victor Macks <vicmacks3@gmail.com>
Sent: Saturday, May 30, 2020 8:47 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] The U.S. does not need a new nuclear weapons plant

Dear Ms. Nelson:

I am writing to oppose plutonium pit production at the Savannah River Site in South Carolina—the No Action Alternative in the Draft EIS. In addition, I believe the NNSA must complete a new Programmatic EIS before it can prepare a site-specific Environmental Impact Statement. The PEIS must fully analyze the reuse of the 15,000+ plutonium pits in storage at Pantex before it embarks on a dangerous, multi-billion dollar plan to build an unnecessary new bomb plant. *The United States does not need and should not produce more plutonium pits for bombs.*

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

The US has more than 4,000 nuclear warheads in the stockpile right now. They are all certified reliable, and will be for at least 50 more years. There is no need to replace plutonium pits—so there is no need to make more. The ONLY argument weaponeers make for a new bomb plant to manufacture plutonium pits is for new nuclear weapons—which Congress forbade in 1993. We do not need new nuclear weapons. We do not need more nuclear weapons.

4/1-c
5/2-c

Sincerely,

Vic Macks
20318 Edmunton St.
St. Clair Shores, MI 48080-3748
586-779-1782
vicmacks3@gmail.com

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

From: Jason McBrayer <jmcbra@carcosa.net>
Sent: Tuesday, June 2, 2020 3:35 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL]

There is a need for a Programmatic Environmental Impact Statement (PEIS) to review all options across the U.S. Department of Energy complex, concerning plutonium pit production for nuclear weapons, including the option to not construct new facilities to produce pits at Savannah River Site (SRS) for the first time, and for expanded plutonium pit production at Los Alamos National Lab.

1/4-f

A bait and switch has been played on the American people. \$7 billion in hard-earned U.S. taxpayer money was wasted on the now abandoned MOX FFF (Mixed plutonium-uranium Oxide Fuel Fabrication Facility) at SRS. DOE and NNSA said one thing, and are now doing the opposite. The irony and hypocrisy is extreme, first claiming to be turning "Swords into Plowshares," in converting weapons-grade plutonium excess to military needs, into "Atoms for Peace" nuclear fuel for commercial electricity reactors, as a supposed non-proliferation program. But from the very beginning, anti-nuclear power critics of the MOX FFF scheme called instead for immobilization -- mixing the weapons-grade plutonium back into the high-level radioactive waste (HLRW) from which it came in the first place, and then treating the forever deadly HLRW re-mixed with weapons-grade plutonium as just that, to be ultimately disposed of at a deep geologic repository found suitable for such after having passed a long list of stringent legal, technical, and social acceptance criteria. So what is this current nuclear weapons plutonium pit production plan? Plowshares into Swords? Swords into Swords? The icing on the cake of irony and hypocrisy is the use of the MOX FFF facility itself for nuclear weapons plutonium pit production, for the first time ever at SRS. Swords into Plowshares transformed into Swords into Swords. The mendacity is on full display for all the world to see.

2/2-h

Another aspect of this unacceptable scheme that must be addressed in a PEIS is its harm and risk to our national security. Beginning with a 2007 Wall Street Journal op-ed, the "Four Horsemen of the Nuclear Apocalypse" -- former Secretaries of State Henry Kissinger and George Schultz, former Defense Secretary William Perry, and former U.S. Senator Sam Nunn -- warned about the existential threat to the U.S. from nuclear weapons in the hands of enemies and even terrorist groups. They have since repeatedly called for abolition of nuclear weapons worldwide, as an essential safeguard of U.S. national security. If even "nuclear hawks" like Kissinger and Schultz fear the existential threat to the U.S. from the continued existence of nuclear weapons, DOE/NNSA and U.S. government policy makers at the highest levels should take heed, before it is too late. This plutonium pit production expansion plan at LANL, and the commencement of such at SRS, flies in the face of such dire warnings.

3/2-a
4/2-c

The example set and message sent by this plutonium pit production expansion scheme at LANL, and its commencement at SRS, increases the risk of nuclear weapons proliferation worldwide. This represents an increasing risk of actual nuclear warfare taking place, which could prove omnicidal.

Under standard National Environmental Policy Act (NEPA) parlance, these are LARGE impacts. They should be treated as such in a comprehensive PEIS, not given short shrift by a slapdash, shallow, half-baked Supplemental Analysis.

1/4-f
(Cont'd)

And what about the Treaty on the Prohibition of Nuclear Weapons, also known as the Nuclear Weapon Ban Treaty? 36 state parties have already ratified it in less than three years. There are already a total of 81 state party signatories as well. If just 14 more state party signatories ratify this treaty, it will enter into the force of international law. The United States, and other countries possessing nuclear weapons, will be rogue nations, violating international law. This plutonium pit production program at LANL and SRS would be yet another violation of that impending treaty. In that sense, the plutonium pit production plan undermines our standing in the world.

5/2-b

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+-----+
| Jason F. McBrayer jmcbray@carcosa.net |
| If someone conquers a thousand times a thousand others in | battle,
| and someone else conquers himself, the latter one |
| is the greatest of all conquerors. --- The Dhammapada |

From: dave mccooy <dave@radfreem.org>
Sent: Tuesday, June 2, 2020 5:43 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] COMMENTS ATOMIC BOMB PRODUCTION AT SAVANNAH RIVER

June 2, 2020
Ms. Jennifer Nelson
NEPA Document Manager
NNSA Savannah River Site Field Office
P.O. Box A
Aiken, SC 29802

Email to: NEPA-SRS@srs.gov

Re: Scoping comments for the National Nuclear Security Administration's (NNSA's) draft Environmental Impact Statement for plutonium "pit" production – for unjustified nuclear weapons - at the proposed Plutonium Bomb Plant at the Savannah River Site

Dear SRS EIS NEPA Document Manager,

Citizen Action New Mexico (CANM), an Albuquerque 501 (c)(3) sponsored organization, submits these comments as provided for by the National Environmental Policy Act (NEPA) on the scope of issues that the NNSA must address in its draft environmental impact statement for plutonium pit production in the proposed Plutonium Bomb Plant (PBP) at the Savannah River Site (SRS). CANM also looks forward to submitting comments on the draft EIS after its completion.

"A humanitarian is a man who believes that no human being should be sacrificed to a project -- especially to the project of perfecting nuclear weapons to kill hundreds of millions of people."
Albert Schweitzer. "A Nobel scientist speaks: Every test kills..." *Liberation* (New York) 2, no. 11. February 1958.

Shortly after the atomic bombs were exploded over Hiroshima and Nagasaki, Albert Einstein made this statement: "The time has come now, when man must give up war. It is no longer rational to solve international problems by resorting to war.

IT IS OBVIOUS THAT THE DOE/NNSA AND U.S. GOVERNMENT ARE EMBARKING ON AN IRRATIONAL PLAN TO CONSTRUCT MORE NUCLEAR WEAPONS:

- **WITH THE SOCIAL INSTABILITY OF THE PANDEMIC COVID-19,**

- **WIDESPREAD RIOTING ACROSS THE U.S.,**
- **THE EXTREME FINANCIAL NEED OF 40,000,000 PEOPLE OUT OF WORK,**
- **INCREASE IN THE NATIONAL DEBT BY TRILLIONS OF DOLLARS,**
- **INCREASED DANGER OF A NEW ARMS RACE AND PROLIFERATION,**
- **CREATION OF UNNECESSARY WEAPONS OF MASS DESTRUCTION FOR THE PLANET AND ITS PEOPLES**
- **INABILITY TO DISPOSE OF THE NUCLEAR WASTES FROM PAST AND PROPOSED PRODUCTION,**
- **RISK OF NUCLEAR WINTER AND EXTINCTION,**
- **AND A PSYCHOTIC AND DANGEROUS PRESIDENT.**

The nuclear weapons industry already has produced tens of thousands of nuclear weapons that are useless for defense and would lead to destruction of large portions of the planet we all share if used. At least 5,000 nuclear weapons are currently deployable by the US. Why the hell do we need any more? The legacy wastes from nuclear weapons production have produced a nightmare of cancer for workers and surrounding communities wherever nuclear weapons production has taken place. Billions of dollars annually are spent on worker and downwinder cancer and disease from past legacy production and contamination. That contamination will continue to increase and adversely impact Savannah River as well as other communities across the US that become involved with contributing facilities and as related activities continue to be expanded.

The Aiken Standard recently reports radioactive contaminated water from the SRS site. https://www.alkenstandard.com/news/radiation-contaminated-water-discovered-at-srs-facility-new-report-states/article_dfbfab38-1a7f-11e9-8ehc-9b1b2832b0b2.html The Savannah River is already contaminated as a result of SRS operations and there is no cleanup in sight. No further SRS operations should continue.

1/5-a

The NNSA is among the most irresponsible, wasteful, incompetent, deceiving, evil organizations on the face of the planet; is totally incompetent to carry out any nuclear project without mind boggling devastation to a community's populace; creating the worst environmental contamination that is never adequately remediated; and will exist for millennia if not millions of years. NNSA operations will guarantee more damage to Americans than any foreign enemy is causing.

The history of nuclear weapon production facilities throughout the United States as a major component of environmental damage and human injuries demands nothing less than a full appraisal of a Programmatic EIS in relation to any continuing or expanded pit production. Waste handling operations of the DOE/NNSA at present, let alone for future operations are without coordination, viable locations or well considered plans. The reprehensible record in New Mexico for worker injuries, cancer, fires, explosions, Rio Grande River and groundwater aquifer contamination from Los Alamos Laboratories (hexavalent Chromium plume), Sandia National Laboratories (Mixed Waste Landfill dump), and WIPP (fires, explosions, plutonium cloud) alone will attest to that, but add in for good measure Hanford, WA (Columbia River contamination), the Idaho National Laboratories, ID (Snake River contamination) and the radioactive waste cloud sent over four states from metallic sodium explosions at Beatty NV. The handling of plutonium and radioactive materials and waste at existing facilities has been dangerous and resulted in numerous accidents due to human error, lack of training and inadequate facilities. The track record of the nuclear weapons industry is abysmal with respect to any aspect of its production for the public and environment – air, water and soil.

Nuclear weapon production is not a defensive tactic for the US because it results in heightened international anxiety and insecurity in other nations that proceed to increase production of nuclear

2/2-c
3/2-g

weapons or materials to produce them, with N. Korea and Iran being two examples. The pit production ramp up is nothing more than a boondoggle for corporations that want to crank up a new arms race to benefit their profit margins.

2/2-c
3/2-g
(Cont'd)

Criticality Safety: There is insufficient staffing of fully-qualified and experienced criticality safety engineers to support the site's current and planned fissile material operations. Especially given that pit fabrication would be totally new to SRS and would be for unjustified new nuclear weapons, CANM supports the "No Action Alternative" of not "repurposing" the failed MOX Fuel Fabrication Facility (MFFF) for conversion into the plutonium Bomb Plant.

4/6-1.5
1/5-a
(Cont'd)

No demonstrated need for additional plutonium pit production: A recent review by JASON of an evaluation of plutonium pit lifetimes by the Laboratories, and accepted by the DOE/NNSA, concludes, "The assessment demonstrates that there is no degradation in performance of primaries of stockpile systems due to plutonium aging that would be a 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."

5/1-c

The Draft EIS must analyze the impacts of diverting taxpayer dollars to new nuclear weapons facilities instead of keeping the focus on the cleaning up the massive environmental damage caused by past nuclear materials production and other waste-producing activities at SRS **and across the United States**. The public health and environmental effects of new radioactive and chemical waste streams that can result in health impacts and pollute precious water resources must be fully reviewed.

6/8-f

- NNSA is likely to throw bad money after bad after 7 billion taxpayer dollars were wasted on the canceled MOX Facility. At the same time independent studies have called NNSA's plan to repurpose the MFFF "extremely challenging" and impossible to achieve by 2030 as claimed. It appears that NNSA's rush to proceed with the Plutonium Bomb Plant will be rife with massive cost overruns and endless schedule delays, as we saw with the MOX boondoggle.

7/5-c

- NNSA's Fiscal Year 2020 budget request and other documents make clear that future pit production will not be to maintain the safety and reliability of the existing nuclear weapons stockpile. Instead future production will be for modified pit designs for new-design nuclear weapons, which has negative nuclear non-proliferation implications. Given the current moratorium on explosive testing of nuclear weapons, those pits cannot be full-scale tested or alternatively, could prompt the U.S. to return to testing, which would have serious international proliferation consequences.

8/2-b
7/5-c
(Cont'd)

- Some 15,000 or more plutonium pits already exist and are stored at DOE's Pantex site in Texas. Independent experts have concluded that modern pits have reliable lifetimes of a century or more. Given this, the draft SRS EIS needs to fully and concretely justify expanded plutonium pit production and discuss reuse of stored pits.

9/1-b
10/3-a

These matters must be considered in a nation-wide programmatic environmental impact statement (PEIS) to be conducted by DOE, a document that must precede the draft SRS EIS. That PEIS is required to raise the current 20 pits per year production cap set by the 1996 Stockpile Stewardship and Management PEIS, which authorizes pit production at only the Los Alamos Lab in New Mexico. A new PEIS is made further necessary now that NNSA plans to have production at a second site (at SRS).

11/4-f

The draft SRS EIS Must Be Completely Free of Predetermination.

This draft SRS EIS will be clearly unusual given that the MFFF is already partially built. NNSA must concretely demonstrate that it can pursue an impartial process without predetermination that leads to an objective decision to repurpose the MFFF, which is faced with design problems and construction problems, for pit production or not.

12/4-h

SRS must not be considered for pit production just because the MFFF already exists.

The issue of jobs or contracts must not drive the establishment of plutonium pit production at SRS, but that appears to be a main motivator for DOE and local politicians and contractors with financial interest in the matter. Those issues should have no bearing on a national security program of this sort. Making this project into a parochial jobs project is also part of DOE's recipe for failure.

13/6-h.6

Before repurposing of the bungled MOX Plant is even considered, there should be investigations into fraud, waste, abuse and mismanagement associated with the MOX program both before and during its termination.

14/8-d

What are the risks of establishing plutonium pit production at SRS, which will be a completely new mission there? Will staff be adequately trained? Will SRS avoid the chronic nuclear safety problems that have plagued the Los Alamos Lab, which has 70 years of experience in pit production yet can still not carry out that mission?

15/6-1
16/6-h.2

The risks of transport of plutonium back and forth to SRS from such sites as the Pantex Plant in Texas and the Los Alamos Lab must be analyzed in the draft EIS.

17/6-m.1

The draft EIS needs to disclose all radioactive and toxic waste streams and how they will be disposed of. The State of South Carolina has been in a long legal struggle with the Department of Energy to not become the nation's *de facto* dumping ground for excess plutonium. How will expanded pit production add to the unwanted inventory of 12 metric tons of plutonium that is already at SRS? If pit production were to get underway and then stop, what guarantee is there that more plutonium would not be stranded at SRS?

18/6-j

All analyses in the draft EIS must address the health risk of waste streams and plutonium management (including criticality risks) to the most vulnerable, that is to pregnant women, fetuses, children and the elderly, rather than the standard, less vulnerable "Reference Man."

19/6-k.4

All draft SRS EIS reference documents must be made accessible online.

20/4-d

The plan to produce more plutonium pits at SRS is a monumental financial scam of the military/industrial complex and an assault on the safety of the peoples of the world and the earth we inhabit.

1/5-a
(Cont'd)

Sincerely,

David B. McCoy, J.D., Executive Director
Citizen Action New Mexico
dave@radfreenm.org

From: Jim McGlinn <jim.mcglinn08@gmail.com>
Sent: Tuesday, June 2, 2020 10:24 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] Savannah River site Plutonium Pit

The U.S. does not need a new plutonium pit site for nuclear triggers. We already have enough bombs to destroy the world many times over.
We already have 15000 plutonium pits that can be used if needed.
But we don't need any more nuclear weapons!

Jim McGlinn
1032 Windsor Drive
Asheville, NC 28803

1/1-b



Los Alamos Study Group

Nuclear Disarmament • Environmental Protection • Social Justice • Economic Sustainability

June 2, 2020

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

Sent today at 6:10 pm EDT by email to NEPA-SRS@srs.gov

Comments on the Draft Environmental Impact Statement (DEIS) for Pit Production at the Savannah River Site (SRS) (DOE/EIS-0541)

1. First, we do not accept NNSA's claimed "mission need" for this project. We understand that this "mission need" is a statutory requirement as well as executive branch policy, but we believe it is bad policy when evaluated against NNSA's broad statutory missions – and worse policy when evaluated against the better national security policies we wish the United States had. We understand however that you must write National Environmental Policy Act (NEPA) analyses that comply with current law. The following comments are therefore written in accordance with the laws we have, not the laws we wish we had.
2. We would like to incorporate the following prior comments by reference, modified by today's comments below, which incorporate new information and understandings:
 - a. [Legal concerns regarding NNSA's pit production plans, Memo to LGH, Feb 5, 2019.](#)
 - b. [Comments on the scope of the Environmental Impact Statement \(EIS\) for plutonium pit production at the Savannah River Site \(SRS\), Jul 25, 2019.](#)
 - c. [Comments on the Draft Supplement Analysis of the Complex Transformation Supplement Programmatic Environmental Impact Statement, \(DSA-CTSPEIS\), Aug 12, 2019; Addendum to comments, Aug 14, 2019.](#)
 - d. [Comments on Draft Supplement Analysis \(DSA\) of the 2008 Site-Wide Environmental Impact Statement \(2008 SWEIS\) for the Continued Operation of LANL for Plutonium Operations \(DOE/EIS-0380-SA-06\), May 9, 2020.](#)
3. The impacts of both alternatives considered in this EIS (the Preferred Alternative [PA] and the No-Action Alternative [NAA]) will be very significant in and around Los Alamos National Laboratory (LANL) as well as at the Savannah River Site (SRS). These LANL impacts are not analyzed in this Draft environmental impact statement (DEIS), nor have they been analyzed in any past or any other present EIS.

NNSA claims that the LANL impacts of the NAA have been "evaluated" in the 2019 Supplemental Programmatic Environmental Impact Statement Supplement Analysis (SPEIS SA) and in the 2020 LANL Site-Wide Environmental Impact Statement (SWEIS) Supplement Analysis (SA) (DEIS, p. S-17).

The "evaluations" in those documents were not EISs, programmatic EISs (PEISs), or supplemental EISs or PEISs, but rather "evaluations" which concluded that environmental analysis was unnecessary.

We believe these conclusions were in error.

2001 Summit Place NE • Albuquerque, NM 87106 • 505-265-1200 • www.lasg.org

1/1-a

2/3-f

4. It is apparent to us that the NAA in this DEIS will have markedly larger environmental impacts than the PA. This signifies three things:

- The NAA has been inappropriately chosen, discussed further below;
- The impacts at and around LANL are not yet understood by NNSA; and
- Once the impacts at LANL are better understood, a nationwide (programmatic) EIS for pit production is needed to better vet pit production alternatives.

It is now plain to us that the only way NNSA will be able to understand the impacts of the DEIS NAA at LANL is to carry out a SWEIS analysis at LANL. At present, NNSA has not even published any plan for its proposed LANL activities with sufficient detail to conduct an environmental analysis, nor has NNSA opened up any meaningful comment on its (unpublished) plan(s) (reference 1d above, at item 2).

For this reason, we believe a LANL SWEIS is needed *prior to* the necessary and legally-required PEIS for pit production (see ref. 1a above, pp. 1-2 and endnote 1.)

By way of example, just a few of the LANL impacts are:

- The need to construct a new Nuclear Facility on at least the scale of the now-abandoned Chemistry and Metallurgy Research Replacement Nuclear Facility (CMRR-NF). The pit production Program Secretarial Officer (PSO) ruled, in June 2017, that the existing Building PF-4 could not reliably or adequately contribute to NNSA's enduring pit production capability (*Pit Production Analysis of Alternatives* [AoA], pp. 47-48). After extensive analysis, NNSA concluded in October 2017 that when pit production began in another facility, "PF-4 can return to the research and development mission for which it was built" (p. 2). This DEIS, in its NAA, which rests on analyses in the SPEIS SA and LANL SA, claims just the opposite.
- Upon information and belief, LANL now has approximately 2,000 persons directly and indirectly involved in its pit production effort, exclusive of construction workers. An additional 2,000 persons will be needed to achieve a rate of only 30 pits per year (ppy), according to the LANL SA, along with some 21 acres of new construction. Production, again according to the LANL SA, must be conducted 24/7 basis to achieve even 20 ppy. This is a larger number of persons than were employed at the Rocky Flats Plant for the first three decades of the latter's operation. These projections alone imply major environmental impacts.
- NNSA has applied to the City of Santa Fe to develop 64-100 acres of land in central Santa Fe for purposes which have not been revealed to the public, raising significant NEPA questions.
- The proposed expansion of LANL requires thousands of additional housing units. LANL and NNSA have met with local government officials to discuss greenfield developments in rural areas to accommodate some of this housing, implying major environmental impacts.
- After consultation with NNSA, Los Alamos County (LAC) has requested that the Department of Energy (DOE) give LAC more than 3,000 acres of LANL land of outstanding scenic, cultural, and wildlife significance for mixed residential, commercial, industrial, and recreational development. This proposed land transfer would have major environmental impacts. LAC's consultants have said 5,000 additional housing units are needed in the County.

2/3-f
 (Cont'd)

3/4-f

2/3-f
 (Cont'd)

2/3-f
 3/4-f
 (Cont'd)
 4/4-n

- The regional traffic impacts of LANL's expansion are already great and are expected to increase further.
- No extant environmental analyses reflect the current state or condition of LANL's key facilities, which have aged since prior analyses. As a surrogate indication of comparative hazard, all other factors being equal, we note that the distance from PF-4 to a residential area is 0.6 miles, as opposed to 6 miles between SRPPF and the SRS site boundary.
- All other factors are not equal of course. The Defense Nuclear Facilities Safety Board (DNFSB) has said, after more than a decade of analysis, that PF-4 does not adequately protect the public. It does not now meet modern nuclear safety standards, and NNSA has no clear, funded timeline for making sure that ever happens. NNSA does not even know if it is possible for PF-4 to structurally withstand a design basis earthquake. Next door to PF-4, the Radiological Laboratory, Utility, and Office Building (RLUOB), which aspires to be a Hazard Category 3 Nuclear Facility, does not meet life safety standards and will take 4-5 years to get there. It will never meet nuclear facility standards except by variance and exemption, as these (NQA-1) standards require certain in-built certifications which RLUOB does not have and cannot now get.
- NNSA has no reality-based environmental analyses of pit production at LANL or of LANL expansion overall, to the extent that NNSA's only EISs for LANL are inaccurate as to even the number of HC2 nuclear facilities present at LANL for plutonium (which is one, not two). The SPEIS SA and LANL SA, and hence the NAA in this DEIS, are built around the assumption that the CMRR-NF was built. NNSA canceled the project, so the NAA rests on assumptions NNSA has found unreasonable. The core of the problem with that project was environmental, having to do with the character of the site. This problem remains and would affect all other similar plans at this site.
- LANL pit production plans have tremendous environmental justice impacts. Indian lands of congressionally-recognized religious and cultural status directly abut, and are immediately downstream, from pit production and related waste storage and disposal areas.

These are some of the reasons the NAA has very large impacts. Overall, LANL's impacts are increasing exponentially because its environmental constraints are being reached and exceeded. Impacts are no longer increasing linearly. LANL and LAC are in many ways "full."

5. The inversion of NEPA nomenclature noted – where the so-called “NAA” appears to have greater estimated impacts than the “PA” – together with prior NNSA analyses of its pit production options, especially in the thorough AoA – suggests a better way forward:
 - *NNSA should drop LANL as an industrial pit production site altogether.* The nationwide environmental impact (and cost, and risks) of pit production would be greatly decreased, as would the necessary and appropriate NEPA analysis.
 - If LANL were still going to expand for other reasons, a SWEIS would still be needed. If not, it is possible a LANL SWEIS could be delayed.
 - While a PEIS would still be necessary to satisfy the Sporkin Memorandum Opinion and Order (ref. 1a, endnote 1), the required PEIS might be simpler, even possibly close to the present EIS in overall content. We have not explored this in depth so it is just a possibility and not a firm opinion at this point. We do want to make very clear, however, that if DOE and NNSA wish to make more than 50 ppy, or to make pits at any site other than LANL, these agencies are under a legal obligation to this

2/3-f
3/4-f
4/4-n
(Cont'd)

organization and other parties to produce, at a minimum, a Supplemental Analysis to the 1996 Stockpile Stewardship and Management Programmatic EIS (SSMPEIS) – a requirement NNSA previously acknowledged in its Modern Pit Facility Draft EIS.

2/3-f
3/4-f
4/4-n
(Cont'd)

6. NNSA should consider these additional alternatives:

- a. No war reserve (WR) pit production at LANL, as noted above. LANL pit production would be limited to R&D and training purposes in this alternative, as foreseen in NNSA's AoA: "PF-4 can return to the research and development mission for which it was built" (p. 2).
- b. WR pit production at SRS, but delayed by 5 or 10 years to 2035 or 2040. NNSA should find this reasonable because a) NNSA believes its cumulative pit production requirement is reasonable and b) the [Institute for Defense Analyses \(IDA\)](#) and [NNSA itself](#) have found that pit production will almost certainly be significantly delayed in any case.
- c. WR pit production at SRS, delayed as noted in c., at some larger rate than 80 ppy. This is currently analyzed in "sensitivity analysis #1" (p. 2-12). This should be a separate alternative and analyzed in detail, along with the (likely) delay in operation noted at c.
- d. At p. 2-19 in the DEIS, NNSA notes that the proposed SRPPF has "excess [Hazard Category] -2 space that NNSA could use to support other missions." Incorporation of these missions will change the environmental parameters of the proposed action and those of other proposed NNSA actions. Such options should be reanalyzed, as the 2015 analysis cited will not capture current opportunities and impacts accurately.

5/3-b

6/3-e

7/4-e

In our scoping comments, we said that WR pit production of up to 20 ppy at LANL was a reasonable alternative. This is the level supported by four prior Records of Decision (RODs), namely those of [Sept. 20, 1999](#), [Sept. 26, 2008](#), [Dec. 19, 2008](#), and [July 10, 2009](#). In its [Notice of Intent \(NOI\)](#) for this EIS, DOE concedes this limitation. Since the publication of the LANL DSA, we now understand that this level of production requires, according to NNSA, a large increase in staff and facilities (ref. 1d). This alternative appears to bring unreasonably large impacts and costs without commensurate benefits. It therefore no longer appears reasonable.

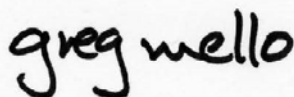
2/3-f
(Cont'd)

- 7. NNSA has not yet ruled out a new SWEIS process for LANL. We urge NNSA to conduct such a process. Its absence undermines the basis of the present EIS.
- 8. We have not analyzed in detail, but we question, the disproportionate estimates for waste generation for SRS and LANL on pp. 2-25 and 2-26. Historically, NNSA's estimates of waste generation have been unreliable.

4/4-n
(Cont'd)

8/6-j.1

Thank you for your attention and consideration.



Greg Mello, Executive Director

From: John Metz <METZ@nku.edu>
Sent: Sunday, May 31, 2020 6:54 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] Opposing new Plutonium pit manufacturing facility at Savannah River Site.

I am writing to oppose the plan to construct a new plutonium pit manufacturing facility at the Savannah River Nuclear Weapons Site. The overarching problem is that the US does NOT need new plutonium pits and the weapons for which they are being made. There are 7 reasons why the NNSA should choose the "No Action" option in the Draft Environmental Impact Statement for this facility.

1. The US has approximately 4000 nuclear warheads which will remain ready for immediate use for decades.
2. There are about 15,000 warheads in storage at the Pantax facility in Amarillo Texas, which are also functional.
3. New Pu pits will be created to be used for new nuclear weapons, which Congress explicitly prohibited in the early 1990s. This is in addition to the US commitment to the Nuclear Non Proliferation Treaty; this treaty makes the bargain between the non-nuclear and nuclear weapon countries that if the non nuclear weapon nations do not attempt to manufacture nuclear weapons, the US and other nuclear weapon holding countries will destroy their nuclear weapons. The US, Russia, and other nuclear weapon holding countries (except Israel, India, Pakistan, N. Korea, which haven't signed the agreement) are in violation of this treaty. Beginning to manufacture new weapons indicates distain for the treaty and will encourage more countries to take the nuclear path.
4. The DOE's Los Alamos complex has facilities to produce Pu pits, so SRS is redundant.
5. The cost to a new facility at SRS will be scores of billions of dollars - cost overruns of 100% to 300% are common. Given the astronomical government budget deficits the andemic induced economic crisis is requiring, we need to cut unnecessary expenses. The SRS facility will be a significant and unnecessary cost.
6. Why does the NNSA want new nuclear weapons? Presumably to create new superior weapons that our adversaries cannot match. As the past has repeatedly shown, sdversaries rapidly match our innovations, creating a treadmill of enormous expense and intensifying danger of unleashing the unthinkable. New weapons will not increase our securtiy. Negotiating reductions is the only rational way forward.
7. Plutonium and pit production are extremely dangerous, with environmental impacts that last for millienia. Rocky Flats had two disasterous fires that came exceedingly close to releasing Pu dust over greater Denver. Waste treatment at all the weapons sites in the 20th cwentury was horrendous. There were accidents and spills, to say nothing of deliberate dumping. Accident, are inevitable. When Pu gets into the river, it will spread the radioactive wastes widely.

1/5-a

2/1-b

3/1-g
4/2-a

5/1-d

1/5-a
(Cont'd)

6/2-g

7/2-i

For all these reasons, I plead with you not to build this facility. Choose the "No Action" option and use that decision to help create treaties that increase security.

John J. Metz

1586 Rockhurst Lane
Cincinnati, OH 45255

From: susan susan <sunlightrising@gmail.com>
Sent: Saturday, May 30, 2020 2:30 AM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] DOE NNSA draft EIS re SRS pit production comments

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

Subject: Comments Re: DOE's National Nuclear Security Administration (NNSA) draft EIS Re: Savannah River Site (SRS) plutonium pit production, Aiken, South Carolina, by June 2, 2020

Dear Ms. Nelson:

I hereby submit the following comments on the *Draft Environmental Impact Statement for Plutonium Pit Production at the Savannah River Site in South Carolina* and ask that they be made part of the official record. The US does not need a new bomb plant. I oppose authorization for new plutonium pit production at SRS. I support the No Action Alternative in the Draft EIS. NNSA must complete a new Programmatic EIS before it can prepare a site-specific Environmental Impact Statement. The PEIS must fully analyze the reuse of the 15,000+ plutonium pits in storage at Pantex before it embarks on a dangerous, multi-billion-dollar plan to build an unnecessary new bomb plant.

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

The US does not need a new bomb plant. The 15,000 plutonium pits stored at the Pantex Plant in Amarillo TX can be reused if needed. The 4000 nuclear warheads are all certified reliable for the next 50 years without any need to replace or make more plutonium pits. The capacity at SRS does not need to be duplicated or expanded. Congress banned new nuclear weapons in 1993.

4/1-c
5/1-d
6/2-a

THE US SHOULD NOT PRODUCE MORE PLUTONIUM PITS. Building a new bomb plant to make new plutonium pits is a provocative act. It will contribute to an escalation of the global nuclear arms race and will undermine US nonproliferation goals. Making new plutonium pits will generate large radioactive and toxic waste streams from which environmental destruction and human health problems will emanate.

7/2-g
8/6-j

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 and which will pose a serious challenge. With the disastrous outcome of pit production at the contaminated Rocky Flats Plant in mind, I raise the following issues to be responded to in any final EIS:

9/1-h

<p>Pit production would produce a host of chemical and nuclear waste streams: It is unacceptable that dumping of low-level nuclear waste in unlined trenches at SRS (or anywhere) is being considered. As the waste statistics in the draft EIS rely on outdated information from earlier documents not related to pit production at SRS, please provide new calculations based on pit production in the terminated MOX plant.</p>	10/6-j.6
<p>Pit production could distract from the main mission of the site and its largest amount of funding---Cleaning up tens of millions of gallons of high-level nuclear waste left over from production of plutonium and nuclear weapons materials. It is unacceptable to divert away from this main mission. Please discuss impacts to the SRS clean-up budget and to the overall budget of DOE's Office of Environmental Management.</p>	11/6-j.8
<p><u>Discuss impacts of a plutonium fire</u>, as took place at Rocky Flats, on the environment, front-line workers and downwind communities, many of which are comprised of minorities, such as the Barnwell, SC area and Shell Bluff, Georgia (directly across the Savannah River from SRS). Discuss impacts of a nuclear accident at the pit plant on the operation of commercial nuclear reactors at Plant Vogtle, across the river in Georgia.</p>	12/6-1.2 13/6-1.3
<p><u>Discuss impacts to the pit site and the SRS support infrastructure of climate change</u> causing localized increases in tornadoes, hurricanes and other extreme weather events.</p>	14/6-d.1
<p>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. <u>Please discuss the threat of a new nuclear arms race.</u></p>	15/2-g
<p><u>Please discuss legal compliance</u> pertaining to producing pits for 80 or more nuclear weapons per year--- at SRS and Los Alamos---until all pits are replaced in all nuclear weapons. How does this comply with the legal requirements in the <u>Nuclear Non-Proliferation Treaty</u> "to pursue negotiations in good faith on effective measures relating to cessation of the nuclear arms race at an early date and to nuclear disarmament, and on a treaty on general and complete disarmament under strict and effective international control"?</p>	15/2-a 16/1-d
<p><u>Discuss the exact purpose(s) for use of new-design weapons pits</u>, including the W87-1-like and W93 warheads. Under what circumstances would new-design weapons and new pits be subjected to underground nuclear testing?</p>	17/1-g 18/2-d
<p>The draft EIS waves off "reuse" of existing pits. Over 15,000 existing pits are in storage at DOE's Pantex site in TX. It is crucial that pit reuse and refurbishment be thoroughly analyzed before new pit production can be considered. <u>Discuss pit reuse in detail.</u></p>	19/3-a
<p>The required <u>discussion about the exact technology</u> to be used to purify plutonium at SRS is missing. The required <u>environmental and health impacts</u> associated with this are missing.</p>	20/6-p.1
<p>As plutonium was stranded at SRS when the MOX project collapsed, <u>what would prevent more plutonium ending up at SRS if</u> the pit project was terminated mid-stream? If the project was halted due to an accident? If the project was halted due to a policy change? Please affirm that no more plutonium will be shipped to South Carolina as long as existing plutonium remains stored at the site.</p>	21/6-j.2
<p>Before "repurposing" is considered of the ill-constructed MOX plant, on which \$8 billion was wasted, there must be <u>investigations into potential waste, fraud, abuse and mismanagement pertaining to the MOX debacle.</u> Please provide evidence that such investigations are taking place and that the many MOX plant construction problems will be publicly identified.</p>	22/8-d

The impact of pit production on the legally mandated cap on the volume of the Waste Isolation Pilot Plant (WIPP) in New Mexico to receive transuranic (plutonium) waste must be reviewed, along with the scheduling and volume impact of receipt of TRU waste from both the pit facility and other DOE sites.

23/6-o.1

Details of the role of the Y-12 National Security Complex in providing HEU or other support for pit production must be fully discussed.

24/6-p.2

I support preparation of an over-arching, legally mandated Programmatic Environmental Impact Statement (PEIS) which would examine the need for expanded pit production and the role in program support, pit design, pit production, and waste handling at DOE sites across the country, including SRS, Los Alamos, Pantex, Y-12, the Waste Isolation Pilot Plant, Sandia, the Nevada Nuclear Security Site, and the Kansas City National Security Campus (which supplies non-nuclear components for all nuclear warheads). The PEIS must be completed before the final EIS on SRS pit production or the Supplement Analysis on pit production at Los Alamos are finalized. NNSA's plans for SRS and Los Alamos are inextricably linked and those plans must be reviewed in a single document: the legally required PEIS.

25/4-f

In conclusion, I support the "no action alternative" whereby the poorly constructed MOX facility would not be converted to plutonium pit production and that this alternative not be linked to pit production at Los Alamos.

26/3-f.1

Thank you for considering my comments and for responding to them. Please confirm receipt of these comments.

Susan Michetti
605 Sheila St.
Mt. Horeb, WI 53572

Susan Michetti
We must end shaming, blaming, and vilifying. We must demand full transparent and open debate of scientific facts and rigorous analysis for all matters that affect our health and safety.

From: Chad Miller <millerchad92@gmail.com>
Sent: Monday, June 1, 2020 9:51 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] Yes I'm for pit project !

| 1/5-b

From: judith mohling <judithmohling76@gmail.com>
Sent: Wednesday, May 27, 2020 8:00 PM
To: NEPA-SRS <NEPA-SRS@srs.gov>
Subject: [EXTERNAL] Proposed Savannah River Plutonium Processing Facility

Dear Ms. Nelson:
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

Re:
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 National Environmental Policy Act record.

I am very concerned about the proposal to expand the role of the Savannah River Site into the production of plutonium pits. Being familiar with the nightmare caused by pit production at Rocky Flats, I do not want to see a repeat of that disaster. I raise the issues below to be responded to in any final EIS.

1/5-a

As a born and bred Coloradoan, who grew up in the shadow of the Rocky Flats Plant just west of Denver, I have strong opinions about the whole idea of producing MORE plutonium pits anywhere, and especially at SRS where they have never been produced before. I graduated from the University of Colorado in Boulder, married a physics professor and moved even closer to Rocky Flats. Now, for thirty years I have been part of the Rocky Mountain Peace and Justice Center, in Boulder, working on bringing about the end of plutonium pit production at Rocky Flats. We achieved this, and in these last years have been working to keep the public off of the Rocky Flats National Wildlife Area, we haven't yet achieved this, but we will. It is not fit for human recreation because it is covered with particles of plutonium. It is dangerous and harmful to all life, including the thousands of people downwind of the old weapons plant. To my thinking it is a tragic legacy of wanton willingness of the US government to endanger communities by insistence on producing nuclear weapons.

2/2-i

Now another community will be harmed if this plan goes forward. 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. What we really need at SRS is funding for cleanup not plutonium pit production! 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 EIS must reveal if the goal is to replace all pits in all U.S. deployed and reserve nuclear weapons and how maintaining a massive stockpile for the foreseeable future complies with the disarmament obligations stated in the Nuclear Non-Proliferation Treaty: ""pursue negotiations in good faith on effective measures relating to cessation of the nuclear arms race at an early date and to nuclear disarmament, and on a treaty on general and complete disarmament under strict and effective international control." Apparently the draft EIS waves off "reuse" of existing pits - some 15,000 or more of them are in storage at DOE's Pantex

3/6-j.6
4/6-j.8
5/2-g

site in TX - and it is imperative that pit reuse and refurbishment be thoroughly analyzed. The JASON group stated in a 2007 report that pits have a minimum of 100 years. Given this, why are new pits needed when old ones can be reused or refurbished? NNSA has been directed by Congress to update the JASON study but has been dragging its feet. When will the new study be completed and what's the rush to move forward without important pit-aging data? Clarify the status of pits that may have been set aside to study the effects of aging. Provide data from these experiments for the EIS record.

6/1-c

Please explain what lessons have been learned from the Rocky Flats pit-production disaster and what information and data is being entered into the EIS record from Rocky Flats. Additionally, clarify if any information being provided by former Rocky Flats workers is informing pit-production proposals.

7/2-i

The discussion of the exact technology chosen to be used to purifying plutonium at SRS is lacking, as is an analysis of the environmental and health impacts associated with this.

8/6-p.1

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?

9/6-j.2

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 and why \$8 billion was wasted on the project without anyone being held accountable.

10/8-d

Preparation of an over-arching Programmatic Environmental Impact Statement (PEIS) which would examine the need for expanded pit production and pit reuse and the role of DOE sites across the country is legally mandated. The role of DOE sites in pit planning and production, including SRS, Los Alamos, Pantex, Lawrence Livermore National Lab, Sandia, Y-12 in Tennessee and the Kansas City Plant (which manufactures on-nuclear weapons components), must be thoroughly examined in the PEIS. The PEIS must be completed before the EIS on SRS pit production is finalized.

11/4-f

In conclusion, I support the "no action" alternative whereby the poorly constructed MOX facility would not be converted to plutonium pit production and new pit production facilities would not be pursued at SRS or Los Alamos.

12/5-a

Thank you for considering my views and for responding to them in the event that a final EIS is prepared.

Name: Judith Mohling
Address: 432 Marine Street
Boulder, CO 80302