DOE/EIS-0387

Final Site-Wide Environmental Impact Statement for the Y-12 National Security Complex

February 2011

National Nuclear Security Administration

U.S. Department of Energy
National Nuclear Security Administration
Y-12 Site Office

Volume II: Comment Response Document

COVER SHEET

RESPONSIBLE AGENCY: United States (U.S.) Department of Energy (DOE), National Nuclear Security Administration (NNSA)

TITLE: Final Site-Wide Environmental Impact Statement for the Y-12 National Security Complex (DOE/EIS-0387) (Final Y-12 SWEIS)

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Abstract: NNSA, a separately organized agency within DOE, is responsible for maintaining the safety, reliability, and security of the U.S. nuclear weapons stockpile to meet national security requirements. NNSA manages nuclear weapons programs and facilities, including those at the Y-12 National Security Complex (Y-12) at Oak Ridge, Tennessee. This Final Y-12 SWEIS analyzes the potential environmental impacts of the reasonable alternatives for ongoing and foreseeable future operations and activities at Y-12, including alternatives for changes to site infrastructure and levels of operation (using production capacity as the key metric for comparison).

Five alternatives are analyzed in this Y-12 SWEIS: (1) No Action Alternative (maintain the status quo); (2) Uranium Processing Facility (UPF) Alternative; (3) Upgrade-in-Place Alternative; (4) Capability-sized UPF Alternative; and (5) No Net Production/Capability-sized UPF Alternative. This document assesses the potential environmental impacts of operations and applicable plans on land uses, socioeconomic characteristics and environmental justice, prehistoric and historic cultural resources, visual resources, geology and soils, biological resources, wetlands, water, air quality, noise, traffic and transportation, utilities and energy, waste management, human health and safety, intentional destructive acts, and accidents. The Capability-sized UPF Alternative is NNSA's preferred alternative.

Public Involvement: NNSA distributed the Draft Y-12 SWEIS in October 2009. The public comment period for the Draft Y-12 SWEIS began on October 30, 2009, with publication of the Environmental Protection Agency's Notice of Availability in the *Federal Register* (74 FR 56189). That notice invited public comment on the Draft Y-12 SWEIS through January 4, 2010, and provided for two public hearings to receive comments on the Draft Y-12 SWEIS. During the comment period, two public hearings were held in Oak Ridge, Tennessee, on November 17 and

18, 2009. At the first hearing, NNSA announced an extension of the comment period until January 29, 2010. That announcement was formalized with a notice in the *Federal Register* on December 28, 2009 (74 FR 68599).

All comments received during the comment period were considered during the preparation of the Final Y-12 SWEIS. All late comments were also considered. The Final SWEIS contains revisions and new information based in part on comments received on the Draft SWEIS. Following issuance of the Draft SWEIS, NNSA determined that a Haul Road was needed to support UPF construction. The Final SWEIS also includes information and analysis of a Haul Road extension corridor for the UPF, including a detailed Wetlands Assessment that was prepared in accordance with 10 Code of Federal Regulations (CFR) 1022, "Compliance with Floodplain and Wetlands Environmental Review Requirements" for the purpose of fulfilling NNSA's responsibilities under Executive Order 11990, "Protection of Wetlands." The Wetlands Assessment is contained in Appendix G. The comments received on that assessment, and NNSA's responses to those comments, are contained in Volume II of the Final SWEIS. In accordance with 40 CFR 1502.9(c)(1), NNSA determined, with respect to the Haul Road, that there were no substantial changes in the proposed action that are relevant to environmental concerns, nor significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts. Consequently, NNSA determined that a Supplemental Draft Y-12 SWEIS was not required.

Vertical change bars in the margins of the Final SWEIS indicate the locations of revisions and new information (in the Summary, small changes are indicated by a double underline). Volume II contains the comments received on the Draft SWEIS and NNSA's responses to the comments. NNSA will use the analysis presented in this Final SWEIS, as well as other information, in preparing the Record(s) of Decision (RODs) regarding Y-12. NNSA will issue one or more RODs no sooner than 30 days after the U.S. Environmental Protection Agency publishes a Notice of Availability of this Final SWEIS in the *Federal Register*. This document and related information are available on the Internet at www.y12sweis.com and DOE's NEPA website at www.nepa.energy.gov/DOE_NEPA_documents.htm.

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Prepared by:

U.S. Department of Energy
National Nuclear Security Administration
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VOLUME II: TABLE OF CONTENTS

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ACRONYMS AND ABBREVIATIONS

CCC	Complex Command Center
CEQ	Council on Environmental Quality
CERCLA	*Comprehensive Environmental Response, Compensation, and Liability Act*
CFR	Code of Federal Regulations
CMC	Consolidating Manufacturing Complex
CRD	Comment Response Document
CTBT	Comprehensive Test Ban Treaty
D&D	decontamination and decommissioning
DDF	Dedicated Dismantlement Facility
DNFSB	Defense Nuclear Facility Safety Board
DoD	Department of Defense
DOE	U.S. Department of Energy
DOE-NE	U.S. Department of Energy Office of Nuclear Energy
EFPC	East Fork Poplar Creek
EIS	Environmental Impact Statement
ES&H	environment, safety and health
ETTP	East Tennessee Technology Park
EU	enriched uranium
FR	*Federal Register*
GAO	Government Accountability Office
GHG	Greenhouse gas
GTRI	Global Threat Reduction Initiative
HEU	highly enriched uranium
HEUMF	Highly Enriched Uranium Materials Facility
HVAC	heating, ventilation, and air conditioning
IFDP	Integrated Facility Disposition Project
LCF	latent cancer fatality
LEP	Life Extension Program
LEU	low-enriched uranium
LLC	Limited life component
LLW	low-level waste
MEI	maximally exposed individual
MLLW	mixed low-level waste
NEPA	*National Environmental Policy Act*
NHPA	*National Historical Preservation Act*
NHL	National Historic Landmarks
NNSA	National Nuclear Security Administration
NOI	Notice of Intent
NPR	Nuclear Posture Review
NPT	Nuclear Nonproliferation Treaty
NRC	Nuclear Regulatory Commission
NRHP	National Register of Historic Places
NWSP	Nuclear weapons stockpile plan
OREPA	Oak Ridge Environmental Peace Alliance

ORNL	Oak Ridge National Laboratory
ORR	Oak Ridge Reservation
PDDs	Presidential Decision Directives
R&D	research and development
ROD	Record of Decision
RRW	Reliable Replacement Warhead
SHPO	State Historic Preservation Officer
SPEIS	Supplemental Programmatic Environmental Impact Statement
START	Strategic Arms Reduction Talks
SWEIS	Site-Wide Environmental Impact Statement
TCE	Trichloroethylene
TN	Tennessee
UPF	Uranium Processing Facility

COMMENT RESPONSE DOCUMENT, CHAPTER 1: PUBLIC COMMENT PROCESS

This chapter of the Comment Response Document describes the public comment process for the Draft Site-Wide Environmental Impact Statement for the Y-12 National Security Complex (Y-12 SWEIS) *and the procedure used in responding to those comments. Section 1.1 describes the means through which comments were acquired, summarized, and numbered. Section 1.2 discusses the public hearing format that was used to gather comments from the public. Section 1.3 describes the organization of this document as well as how the comments were categorized, addressed, and documented. Section 1.4 provides guidance on the use of this document to assist the reader. The chapter concludes with a discussion of the major comments on (Section 1.5), and changes to (Section 1.6), the Draft Y-12 SWEIS resulting from the public comment process.*

1.1 INTRODUCTION

NNSA distributed the Draft Y-12 SWEIS in October 2009. The public comment period for the Draft Y-12 SWEIS began on October 30, 2009, with publication of the Environmental Protection Agency's Notice of Availability in the *Federal Register* (74 FR 56189). That notice invited public comment on the Draft Y-12 SWEIS through January 4, 2010, and provided for two public hearings to receive comments on the Draft Y-12 SWEIS. During the comment period, two public hearings were held in Oak Ridge, Tennessee, on November 17 and 18, 2009. At the first hearing, NNSA announced an extension of the comment period until January 29, 2010. That announcement was formalized with a notice in the *Federal Register* on December 28, 2009 (74 FR 68599).

Although the public comment period for the Draft Y-12 SWEIS closed on January 29, 2010, NNSA was able to process and consider all comments related to the SWEIS that it received after the close of the comment period. This Comment Response Document (CRD) includes responses to all comments that were received related to the SWEIS. Comments that were received on the Wetlands Assessment of the haul road extension are also contained in this CRD.

Attendance at each hearing, together with the number of commentors, is presented in Table 1.1-1. Attendance numbers are based on the number of participants who completed and returned registration forms and may not include all of those present at the hearings.

Table 1.1-1. Public Hearing Attendance and Number of Commentors.

Hearing Location	Total Attendance	Commentors
Oak Ridge, TN (November 17)	129	54
Oak Ridge, TN (November 18)	165	54

In addition, the public was encouraged to provide comments via mail, facsimile, or e-mail (y12sweis.comments@tetratech.com). Chapter 2 of this CRD contains a copy of the comment documents NNSA received as well as a summary of the oral comments made at the public hearings. Table 1.1-2 provides an overview of the number of documents and comments submitted by each method.

Table 1.1-2. Document and Comment Submission Overview.

Method	Documents Received	Total Comments Identified
E-mails	115	274
Fax	4	9
Letter/Postcard Campaigns	151	151
Mail-in	65	154
Hand-in at public hearings	16	29
Oral Comments from Public Meetings	N/A	177
Comments on Wetlands Assessment	2	29
Total	**353**	**823**

1.2 PUBLIC HEARING FORMAT

Each public hearing began with an open house with poster stations to facilitate interaction with the public and to provide information and respond to questions. That was followed by a traditional hearing format, during which a neutral facilitator ensured that everyone who wished to do so had an opportunity to provide comments. A court reporter prepared a verbatim transcript of the proceedings and recorded all comments presented by the public.

The format used for each hearing included a presentation by the Document Manager. That presentation included a summary of the Draft Y-12 SWEIS and a discussion of the *National Environmental Policy Act* (NEPA) process. The facilitator then opened the hearing for comments. Attendees who wished to speak at the hearing were required to sign up on a speakers list. Federal and state-wide elected representatives attending the hearings were afforded priority to speak. Locally-elected officials were alternated with other attendees who spoke on a "first come" basis according to their order on the speakers list.

1.3 ORGANIZATION OF THIS COMMENT RESPONSE DOCUMENT

This CRD has been organized into the following sections:

- Chapter 1 describes the public comment process and contains tables with: the list of attendees at the public hearings; an index of commentors who submitted comments; and the comment document and response locators to assist readers with using this CRD. NNSA received 353 comment documents related to the Draft Y-12 SWEIS.
- Chapter 2 contains scanned copies of comment documents received during the public comment period, and also includes a summary of the oral comments received during the public hearings. The summary of comments received during the public hearings can be found in Chapter 2 of this CRD beginning on page 2-164. Because the transcripts from the public hearings are very lengthy, they are not reproduced in this CRD. However, those transcripts, along with the specific comments from those transcripts, are on the Y-12 SWEIS web site (www.y12sweis.com).
- Chapter 3 contains summaries of all comments organized by topic and NNSA responses to those comments.

Tables are provided at the end of this chapter to assist commentors and other readers in locating individual comments. Individual comments were identified within each comment document and categorized by issue (e.g., nuclear weapons policy, land use, waste management, etc.). Table 1.3–1 lists the issue categories and corresponding issue codes. Similar comments within the same issue category were then summarized, and these summaries are presented in Chapter 3 of this CRD along with NNSA's responses to the comments.

Table 1.3-2 identifies the individuals who attended public hearings. Commentors interested in locating their comment document and reviewing how it was coded can use Tables 1.3-3 through 1.3-7. Table 1.3-3 identifies the individuals who presented comments at the hearings and the pages where the summary of the comments from those hearings appear. Table 1.3-4 lists members of the general public who submitted comments alphabetically by last name. Table 1.3-5 lists state and local officials and agencies, companies, organizations, and special interest groups that submitted comments. The commentors in Table 1.3-5 are listed by organization in alphabetical order with the names of the individuals who submitted those documents. Table 1.3-6 lists the multi-signatory documents (i.e., those signed by more than one individual). Table 1.3-7 lists campaign comment documents (campaigns were conducted by various organizations and special interest groups to encourage individuals to separately submit the same or substantively similar comments). Only one copy of each campaign document is included in Chapter 2. The page number given in Tables 1.3-3 through 1.3-7 refers to the first page on which the comment document appears.

1.4 HOW TO USE THIS COMMENT RESPONSE DOCUMENT

Begin by locating the commentor's name in Tables 1.3-3 through 1.3-7, as appropriate. These tables list the page number on which that commentor's document appears in Chapter 2. To see what issue codes were assigned to the comments identified within a document, locate the document in Chapter 2. Chapter 2 contains scans of the document with sidebars identifying the issue code assigned to each comment. Chapter 3 contains comment summaries and responses to the comments identified in Chapter 2.

For example, if Mr. Mike Belbeck wanted to track his comments, he would go to Table 1.3-4 to find his name, and the corresponding page on which his comment document appears in Chapter 2 (page 2-19). On page 2-19, Mr. Belbeck would find that his scanned document has been side-barred and coded 13.0 for the first comment and 12.H for the second comment. After obtaining the issue codes from the scanned document, Mr. Belbeck could go to Chapter 3, locate those issue codes, and read the responses. For example, the first comment was assigned issue code 13.0. He would then go to Chapter 3 and find the response to issue 13.0 on page 3-57. The second comment was assigned issue code 12.H. He would go to Chapter 3 and find the response to issue 12.H on page 3-35.

Table 1.3-1. Issue Categories.

Category Code	Issue Category
1.0	Nuclear Weapon Policies - General
1.A	Nuclear Posture Review, JASON Report
1.A.1	Size of Projected U.S. Stockpile
1.B	Presidential Directives, Public Law, and Current Policies
1.B.1	Moscow Treaty, Treaty of 2010
1.C	Treaty on Nonproliferation; Zero Weapons
1.D	New Weapons
1.E	Proliferation and Nonproliferation
1.E.1	SWEIS Should Include Proliferation Analysis
1.F	International Relations
1.G	War on Terror
2.0	NEPA Process
2.A	General NEPA Process and Compliance
2.B	Length of Comment Period, Number/Location of Public Hearings
2.C	Stakeholder Involvement
2.D	Process Notification
2.E	Public Hearing Process
2.F	NEPA Compliance
2.G	Specific Editorial Comments on the SWEIS
2.G.1	More Detailed CCC Analysis
2.G.2	Insufficient Cost and Socioeconomic Analysis
2.G.3	Insufficient Distinction Between Dismantlement and Production Options
2.G.4	DNFSB Recommendation 2004-2, Active Confinement Systems, and DNFSB/TECH-34 Implementation
2.H	Availability of Information
2.I	Rescoping
3.0	Purpose and Need
3.A	General Question of Need; Immorality of Nuclear Weapons
3.B	Need for Modernization and UPF
3.C	Need for Secondaries
4.0	No Action Alternative (Alternative 1)
5.0	UPF Alternative (Alternative 2)
6.0	Upgrade In-place Alternative (Alternative 3)

Table 1.3-1. Issue Categories (*continued*).

Category Code	Issue Category
7.0	Capability-sized UPF Alternative (Alternative 4)
7.A	Capacity Questions
7.B	Preferred Alternative and Proliferation
7.C	Space Requirements
8.0	No Net Production/Capability-sized Alternative (Alternative 5)
8.A	Rationale for Selecting Preferred Alternative
9.0	Other Alternatives that Should Have Been Considered
9.A	Curatorship Alternative, "6th Alternative"
9.B	Dismantlement Facility Only
9.C	Alternatives Undermine President's Policies
9.D	Dismantlement Should Have Been Discussed in SWEIS
9.E	HEU Downblend Alternative
9.F	Use of HEUMF for EU Operations
10.0	Cost and Schedule
10.A	Cost Effectiveness of Existing Nuclear Security Enterprise
10.B	Better Use of Resources
10.C	Costs of Alternatives
10.D	Taxpayer Money
11.0	Security Issues, Sabotage, and Terrorism
11.A	Sabotage and Terrorism - General
11.B	Evaluation of Sabotage and Terrorism
11.C	Existing Security
11.D	Classified Appendix
12.0	Resources
12.A	Land Use
12.B	Site Infrastructure
12.C	Air Quality
12.D	Water Resources
12.E	Geology and Soils
12.F	Biology
12.G	Cultural Resources
12.G.1	Preserve World War II Era Buildings
12.H	Socioeconomics

Table 1.3-1. Issue Categories (*continued*).

Category Code	Issue Category
12.I	Environmental Justice
12.J	Health and Safety
12.J.1	Cancer to Workers
12.J.2	Health of Surrounding Oak Ridge Area
12.J.3	Release of Materials
12.J.4	Uranium Discharge
12.K	Transportation
12.L	Waste Management
12.M	Facility Accidents
12.M.1	Seismic and Natural Phenomena
12.M.2	Accidents Involving Chemicals
12.M.3	Accidents Involving Other Life Forms (Plants and Animals)
12.N	Cumulative Impacts
12.O	Past Contamination at Y-12
12.P	Integrated Facilities Disposition Program
12.Q	Global Threat Reduction Initiative (GTRI)
12.R	Complementary Work / Work for Others Program
12.S	Climate Change/Just Do It Approach
12.T	Wetlands/Surveys/UPF Haul Road
13.0	General Supporting Comments
14.0	General Opposition Comments
15.0	Out of Scope Comments
15.A	Evaluate Use of Nuclear Weapon
16.0	Other
16.A	ROD Suggestions
16.B	Uranium Mining

1.5 MAJOR COMMENTS RECEIVED DURING THE PUBLIC COMMENT PERIOD ON THE DRAFT Y-12 SWEIS AND ON THE WETLANDS ASSESSMENT

Three hundred and fifty-three (353) comment documents (including 151 comment documents as part of 7 e-mail, letter, and postcard campaigns) were received from individuals, interested groups, tribal governments, and Federal, state, and local agencies during the public comment period on the Draft Y-12 SWEIS. In addition, 115 comment documents were received via e-mail and 108 commentors spoke at the two public hearings. The major comments included the following:

- Commentors stated opposition to nuclear weapons, modernization of Y-12, and a new Uranium Processing Facility (UPF) because:

    - The United States is not in compliance with Article VI of the Nuclear Nonproliferation Treaty (NPT);
    - Nuclear weapons lead to nuclear weapons proliferation;
    - Nuclear weapons are immoral;
    - Nuclear weapon activities make Y-12 and the surrounding community more at risk to accidents and terrorist activities;
    - Nuclear weapons take money away from the clean-up of sites already contaminated;
    - A UPF is not needed;
    - More nuclear weapon activities will produce contamination at Y-12; or
    - Nuclear weapon activities result in adverse health and safety impacts in communities surrounding Y-12.

- Commentors stated that the Y-12 SWEIS and any modernization actions should not proceed before a new Nuclear Posture Review (NPR) is completed in 2010.

- Commentors felt that there are better ways in which taxpayers' money could be spent, such as: feeding the poor, providing better housing for the poor, performing energy efficiency research and development, and cleaning up contaminated sites.

- Commentors expressed support for a new UPF, stating that such a facility would improve safety, security and reduce costs.

- Commentors stated that a sixth alternative should be added to the SWEIS and considered by NNSA. Alternative 6, which was referred to as the Curatorship Alternative, was described by commentors as follows:

    > Alternative 6 recognizes a need for a Stockpile Stewardship mission that can be achieved through an upgrade in place to existing facilities. It recognizes the increasing demand for a verifiable safeguarded dismantlement capacity which must be addressed. Current facilities should be analyzed. And if there is a need, [NNSA] can construct a new dismantlement facility. The benefits of such an

alternative include workforce retention and the reduction of the high-security area.

- Commentors stated that NNSA needs to prepare a Supplemental Draft SWEIS because the impacts associated with the Haul Road extension corridor and supporting infrastructure were not presented in the Draft Y-12 SWEIS.

1.6 MAJOR CHANGES FROM THE DRAFT Y-12 SWEIS

In response to comments received on the Draft Y-12 SWEIS, to include data not available at the time of the development of the Draft SWEIS, and to correct errors and omissions, NNSA made changes to the Draft Y-12 SWEIS. The Summary and Volume I of this Final Y-12 SWEIS contain changes, which are indicated by a sidebar in the margin. A summary of the more meaningful changes is provided below.

- NNSA added a discussion of the dismantlement process and dismantlement requirements to the Final SWEIS (Section 2.1.1.1).

- NNSA updated the discussion of national security considerations, including information on the New START Treaty (Section S.1.5.1 and Section 1.5.1), the JASON report entitled "Lifetime Extension Program" (Section S.1.5.2 and Section 1.5.2) and the 2010 NPR (Section S.1.5.2 and Section 1.5.2).

- NNSA provided additional information regarding the Complex Command Center (CCC), including additional information regarding siting considerations for that facility (Section S.3.1.2.2 and Section 3.2.2.2).

- NNSA updated the water use requirements for all alternatives (Section 5.7.2.2).

- NNSA added information and analysis of the Haul Road extension corridor and supporting infrastructure for the UPF, including a detailed Wetlands Assessment (Section 5.1.2, Section 5.8.2, and Appendix G).

- NNSA added a sensitivity analysis of Alternatives 1 and 3 at smaller operational levels (Section 5.17).

- Based on a better understanding of workforce drivers associated with different capacity scenarios, NNSA revised the employment numbers associated with Alternatives 4 and 5 (Section 5.10.4 and 5.10.5).

Table 1.3-2. Index of Attendees at Public Hearings.

Public Hearing Attendees	
November 17, 2009	
Abbott, Jeri, Pleasant Hill, TN	Keller, Glenn A., Oak Ridge, TN
Anderson, Dave, Lenoir City, TN	Kernodle, John P., Knoxville, TN
Barker, James, Oak Ridge, TN	Kerwin, Ben, Knoxville, TN
Beehan, Tom, Oak Ridge, TN	Keyes, Marcus, Washburn, TN
Bell, Rebekah E., Knoxville, TN	Kreis, Evora, Knoxville, TN
Bergier, Kim Joy, Madison Heights, MI	Lane, Ryan P., Swannanoa, NC
Bone, Gerald, Knoxville, TN	Larson, Jean, Leicester, NC
Bradsher, Patti, Oak Ridge, TN	Linge, David, Na, OT
Branum, Lance, Heiskell, TN	Lord, Charles, Pleasant Hill, TN
Brown, Rick, Sevierville, TN	Lundberg, Lark, Knoxville, TN
Brown, Mira, Burnsville, NC	Magness, Eddie A., Oak Ridge, TN
Brumley, William J., Kingston, TN	Marie, Brandy
Brunger, Scott, Maryville, TN	Markle, Judy, Grosse Pointe Park, MI
Cain, Ruth, Knoxville, TN	Martin, Ruth, Knoxville, TN
Campbell, Henry, Knoxville, TN	McDaniel, Keith, Oak Ridge, TN
Clapham, Martin, Knoxville, TN	McGhee, J.C., Clinton, TN
Clark, Ruth	McLeod, Emma, Knoxville, TN
Clark, Donald B., Pleasant Hill, TN	McMahan, Gina, Oak Ridge, TN
Conrad, Dave, Oak Ridge, TN	McNamara, Stacey, Oak Ridge, TN
Davis, Jessica, Knoxville, TN	McNutt, Mary Anne, Knoxville, TN
Davletmuratova, Indira, Maryville, TN	Mendola, Annette
Deckard, James & Ruth, Knox, TN	Milligan, Tim, Knox, TN
Denderick, M., Kingston, TN	Morehead, Tupper, Norris, TN
Everett, Duncan, Pleasant Hill, TN	Muenstermann, Herb, Pleasant Hill, TN
Feldman, Lena, Ashville, NC	Murphy, Polly, Knoxville, TN
Foster, James L., Knoxville, TN	Nichols, Jackie, Clinton, TN
Fowler, James, Knoxville, TN	Nicholson, Pat
Free, Marcia C., Knoxville, TN	Nickle, Carol, Knoxville, TN
Galbraith, William, Louisville, KY	Nickle, Bill
Gawarecki, Susan, Oak Ridge, TN	Nobles, Jim, Clinton, TN
Gertsen, John H., Knoxville, TN	Norlin, Miranda, Asheville, NC
Goff, Gary, Harriman, TN	O'Connor, Jim, Oak Ridge, TN
Green, Carol, Maryville, TN	Patrie, Lewis
Griswold, Jonathan, Washington, DC	Peters, Roena, Oak Ridge, TN
Groton, Jimmy, Oak Ridge, TN	Phelps, Sharon, Maryville, TN
Hagan, Gary, Knoxville, TN	Powell, Pat, Oak Ridge, TN
Hale, Byron H., Clinton, TN	Reno, Christopher, Andersonville, TN
Hallock, Judith, Asheville, NC	Richards, Kitty Katherine
Hardy, Parker, Oak Ridge, TN	Roquemore, Wayne, Knoxville, TN
Hatcher, Mark, Oak Ridge, TN	Rudy, Greg, Knoxville, TN
Haun, Margaret Sylvia, Pleasant Hill, TN	Rundle, Bob & Helen, Knoxville, TN
Henighan, Richard & Lucy, Seymour, TN	Sabbe, Michael, Knoxville, TN
Hickey, William, Detroit, MI	Schoenewaldt, Pamela, Knoxville, TN
Hickman, Beth, Rockwood, TN	Sellers, Lewis A., Rutledge, TN
Hondulas, John, Knoxville, TN	Sellers, Cynthia J., Rutledge, TN
Howanitz, John, Knoxville, TN	Sessions, Lee, Knoxville, TN
Hugus, David, Knoxville, TN	Shelton, Todd, Knoxville, TN
Huotari, John, Oak Ridge, TN	Shelton, Ronald, Oak Ridge, TN
Hutchison, Ralph, Knoxville, TN	Singley, Elizabeth, Kingston, TN
Johnson, Erik, Maryville, TN	Slack, Jeff & Terri, Knoxville, TN
Johnson, Nancy A., Oak Ridge, TN	Smith, Robin, Chattanooga, TN
Jones, Steve, Oak Ridge, TN	Stark, Leonard A., Pleasant Hill, TN

Table 1.3-2. Index of Attendees at Public Hearings (*continued*).

Public Hearing Attendees	
Steffy, Ann, Royal Oak, MI	Whalen, John R., Harriman, TN
Stokes, Lloyd E., Oak Ridge, TN	Wheeler, David
Stokes, Betty R., Oak Ridge, TN	White, P.D., Oak Ridge, TN
Struss-Keyes, Glenda, Washburn, TN	Whitley, Garry, Maryville, TN
Sullivan, Joan, Knox, TN	Wiberley, Marilyn & Al, Alcoa, TN
Summers, Jay, Knoxville, TN	Wilburn, Bill, Oak Ridge, TN
Tewes, W.E. Bill, Oak Ridge, TN	Wilcox, William J., Oak Ridge, TN
Thompson, Judith, Detroit, MI	Wilson, Keith, Oliver Springs, TN
Vickers, Barry, Oak Ridge, TN	Wilson, Rickey & Yulonda R., Oliver Springs, TN
Vigil, Pat, Harriman, TN	Wilson, Harold, Knoxville, TN
Von Mizener, Mitzi Wood	Woodward, Cynthia, Knoxville, TN
Wascom, Shelley, Knoxville, TN	Young, Saul, Knoxville, TN
Watson, Jinx, Kingston, TN	
November 18, 2009	
Acosta, Javier A., Oak Ridge, TN	Dodson, Elsie T., Knoxville, TN
Adams, Ben C., Oak Ridge, TN	Dodson, Wm H., Knoxville, TN
Adkins, Darrell, Powell, TN	Duke, Stan, Knoxville, TN
Allen, C. M., Knoxville, TN	Easterling, Sam, Louisville, TN
Anderson, Richard, Knoxville, TN	Evered, J. Erich, Oak Ridge, TN
Andrews, Brian, Knoxville, TN	Ewald, Linda, Knoxville, TN
Atwood, Jr., James L., Knoxville, TN	Ezelle, J. Don, Knoxville, TN
Bailey, Mack, Oak Ridge, TN	Fee, Gordon
Barber, Kathy, Oak Ridge, TN	Fitzmaurice, Gina, Oak Ridge, TN
Barrett, William	Fritts, Eric
Barrington, Craig, Oak Ridge, TN	Gertsen, John H., Knoxville, TN
Beehan, Tom, Oak Ridge, TN	Greene, Jerry L., Knoxville, TN
Bell, Zetty	Griffin, Joe, Knoxville, TN
Bergier, Kim Joy, Madison Heights, MI	Hagan, Gary, Knoxville, TN
Bias, Duane	Hale, Tim, Knoxville, TN
Bowers, Terry L., Powell, TN	Hampton, Jerry L., Oak Ridge, TN
Bowland, Bruce, Knoxville, TN	Harvey, Howard W., Oak Ridge, TN
Bradshaw, David, Oak Ridge, TN	Herring, Kenneth, Oak Ridge, TN
Brown, Billy	Hickey, William, Detroit, MI
Brown, Dewey L., Lenoir City, TN	Holt, Bruce A., Clinton, TN
Byrd, James, Louisville, TN	Huddleston, Rosie, Harriman, TN
Cantrell, Danny	Huffaker, Jack
Carson, Pat	Hutchison, Ralph, Knoxville, TN
Chinn, Rick, Oak Ridge, TN	Iden, Douglas C., Oak Ridge, TN
Chopman, Lynn	Inklebarger, Randy, Knoxville, TN
Christian, Jill, Oak Ridge, TN	Insalaco, Tom, Oak Ridge, TN
Collier, C. K., Oak Ridge, TN	Jago, Rob, Kingston, TN
Cowart, Jarred, Knoxville, TN	James, Alan, Oak Ridge, TN
Cox, Glenn, Knoxville, TN	Janney, Douglas, Oak Ridge, TN
Cox, Shirley	Jarnigan, Sara, Oak Ridge, TN
Cuddy, L. Mike, Oak Ridge, TN	Johns, Greg, Knoxville, TN
Davis, Charlene, Knoxville, TN	Johns, Judy, Oak Ridge, TN
Davis, Gina, Oak Ridge, TN	Johnson, Anthony L., Knoxville, TN
Davis, Jessica, Knoxville, TN	Jones, Steve, Oak Ridge, TN
Davis, Justin, Knoxville, TN	Kilkeary, Nan, Knoxville, TN
Denton, Kim, Oak Ridge, TN	King, Tom, Oak Ridge, TN
Dials, Bill, Oak Ridge, TN	Kopp, Steve, Oak Ridge, TN
Dodson, Elsie T., Knoxville, TN	Lam, Ben, Oak Ridge, TN

Table 1.3-2. Index of Attendees at Public Hearings (*continued*).

Public Hearing Attendees	
Lariviere, Sam, Oak Ridge, TN	Ray Dawson, Whitney, Knoxville, TN
Lenhard, Joe, Oak Ridge, TN	Representative, TEMA, Knoxville, TN
Lester, P. Kreis, Knoxville, TN	Revis, Nathaniel, Oak Ridge, TN
Lawson, Randy	Rezaie, Hooshan G., Oak Ridge, TN
Leaverton, David, Knoxville, TN	Richey, Mark, Oak Ridge, TN
Little, Steven	Richey, Thomas, Powell, TN
Macon, Richard, Knoxville, TN	Rimel, George, Clinton, TN
Malone, Michael, Lenoir City, TN	Robinson, Scott D., Knoxville, TN
Manzo, Anthony, Oak Ridge, TN	Sandstrom, Michael, Knoxville, TN
Markle, Judy, Grosse Pointe Park, MI	Schuetz, Wendy, Knoxville, TN
Martin, Connie, Oak Ridge, TN	Shaw, Sherree, Knoxville, TN
Martin, Gary L., Oak Ridge, TN	Short, Linda, Oak Ridge, TN
Martin, Herb	Shults, Wilbur, Oak Ridge, TN
Massengill, Alan, Oak Ridge, TN	Singla, Harbans, Oak Ridge, TN
Mathews, Abe, Knoxville, TN	Singleton, George, Oak Ridge, TN
Mattie, Stan, Lafollettee, TN	Smith, Ray, Oak Ridge, TN
McGilvary, Reuben, Amarillo, TX	Steffy, Ann, Royal Oak, MI
McLean, James, Knoxville, TN	Stook, Brenda, Knoxville, TN
McMillan, Patrick, Oak Ridge, TN	Sullivan, Bret, Knoxville, TN
Mehlhorn, H.G., Wartburg, TN	Swinney, Keith, Lenoir City, TN
Messerli, Doug, Knoxville, TN	Thompson, Brennan
Miles, James, Hampton, SC	Thompson, Judith, Detroit, MI
Miller, Jane	Thornton, William, Oak Ridge, TN
Miller, Jeffrey R., Knoxville, TN	Thress, Michael
Monroe, Larry, Knoxville, TN	Twardy, Lindsey, Oak Ridge, TN
Moore, R. Scott, Knoxville, TN	Underwood, Scott, Oak Ridge, TN
Mountain, Pat, Knoxville, TN	Vowell, Scott, Oak Ridge, TN
Muldrew, Dan, Knoxville, TN	Wagley, Garrett
Mulkey, Jim, Oak Ridge, TN	Waller, Bridget Correll, Knoxville, TN
Mulvenon, Norman, Oak Ridge, TN	Waters, Dean A., Oak Ridge, TN
Murphy, Andrew P., Knoxville, TN	Weller, Paul, Knoxville, TN
Nobles, Jim, Clinton, TN	Whalen, John R., Harriman, TN
Nordberg, Stuart, Knoxville, TN	White, P. D., Oak Ridge, TN
Nwangwa, Chudi, Oak Ridge, TN	Whites, Matthew, Oliver Springs, TN
O'Kain, David, Oak Ridge, TN	Whitley, Garry, Maryville, TN
Osmand, Pam, Knoxville, TN	Whitus, Matthew
Ownby, Greta, Oak Ridge, TN	Wilburn, Bill, Oak Ridge, TN
Patterson, Devin, Knoxville, TN	Wiles, Cherrie, Oak Ridge, TN
Pearson, Richard, Oak Ridge, TN	Wilhoite, Scott, Knoxville, TN
Peters, Brandon	Wolfe, James, Seymour, TN
Pharis, Jeri, Knoxville, TN	Woody, James
Presley, Robert	Worley, Cris, Knoxville, TN
Prine, Betsy, Knoxville, TN	Wynegar, Kathy, Knoxville, TN
Ramsey, Janice, Oak Ridge, TN	Wyrick, Carolyn, Kingston, TN
Presley, Robert	Young, Richard
Prine, Betsy, Knoxville, TN	Zimmerman, David
Ramsey, Janice, Oak Ridge, TN	

Table 1.3-3. Index of Attendees at Public Hearing Providing Comments.

November 17, 2009			
Document Page Number 2-164			
Beehan, Tom	Haun, Margaret Sylvia	Markle, Judy	Rudy, Greg
Bergier, Kim Joy	Hickey, William	McLeod, Emma	Rundle, Bob & Helen
Bone, Gerald	Hickman, Beth	McMahan, Gina	Shelton, Todd
Brown, Mira	Hondulas, John	Mendola, Annette	Singley, Elizabeth
Brown, Rick	Hutchison, Ralph	Morehead, Tupper	Stark, Leonard A.
Brumley, William J.	Johnson, Erik	Murphy, Polly	Steffy, Ann
Clark, Ruth	Jones, Steve	Nicholson, Pat	Struss-Keyes, Glenda
Clark, Donald B.	Kernodle, John P.	Nickle, Carol	Tewes, W.E. Bill
Feldman, Lena	Keyes, Marcus	Nickle, Bill	Von Mizener, Mitzi Wood
Foster, James L.	Kreis, Evora	Norlin, Miranda	Whalen, John R.
Free, Marcia C.	Lane, Ryan P.	Patrie, Lewis	Wheeler, David
Green, Carol	Linge, David	Richards, Kitty Katherine	Whitley, Garry
Griswold, Jonathan	Lord, Charles	Roquemore, Wayne	Wilcox, William J.
Hallock, Judith	Marie, Brandy		
November 18, 2009			
Document Page Number 2-167			
Acosta, Javier A.	Dials, Bill	Macon, Richard	Presley, Robert
Adams, Ben C.	Easterling, Sam	Malone, Michael	Ramsey, Janice
Andrews, Brian	Evered, J. Erich	Manzo, Anthony	Richey, Mark
Bailey, Mack	Ewald, Linda	Martin, Connie	Richey, Thomas
Beehan, Tom	Fee, Gordon	Martin, Herb	Sandstrom, Michael
Bias, Duane	Gertsen, John H.	Massengill, Alan	Singleton, George
Bradshaw, David	Huddleston, Rosie	Mathews, Abe	Swinney, Keith
Chinn, Rick	Huffaker, Jack	McMillan, Patrick	Thompson, Brennan
Collier, C. K.	Hutchison, Ralph	Messerli, Doug	Thress, Michael
Cox, Shirley	Inklebarger, Randy	Miller, Jeffrey R.	Wagley, Garrett
Cuddy, L. Mike	Kopp, Steve	Miller, Jane	Waters, Dean A.
Davis, Gina	Lawson, Randy	Murphy, Andrew P.	Whitus, Matthew
Davis, Jessica	Leaverton, David	O'Kain, David	Woody, James
Davis, Justin	Little, Steven		

Table 1.3-4. Index of Commentors, Private Individuals.

Commentor Information	Document Page Number
Akins, Darrell, Oak Ridge, TN	2-2
Anderson, Dave, Lenoir City, TN	2-4
Angelo, Peter	2-5
Anonymous, Anonymous	2-5
Anonymous, Anonymous	2-6
Anonymous, Anonymous	2-6
Anonymous, Anonymous	2-7
Anonymous, Anonymous	2-7
Anonymous, Anonymous	2-8
Anonymous, Anonymous	2-8
Armstrong, Monica	2-9
Arnshek, Angela, Asheville, NC	2-9
Bane, Ken	2-10
Barakat, Yusif, Pinckney, MI	2-11
Barker, Lawrence, Wilmington, OH	2-15
Barkman, William Edward	2-15
Bassett, David R., Knoxville, TN	2-16
Bedford, Crayton, Asheville, NC	2-17
Belbeck, Mike, Oak Ridge, TN	2-19
Bell, Rebekah E., Knoxville, TN	2-19
Bennet, Mark-Ellis, Asheville, NC	2-20
Bergmann, Fred, Poynette, WI	2-20
Bevan, Hesperia, Clarksville, OH	2-21
Billmeier, Gerard J., Memphis, TN	2-21
Birchenough, Katie	2-22
Bodley, William, Chesterfield Township, MI	2-22
Bolin, A.	2-23
Bone, Gerald, Knoxville, TN	2-23
Boosinger, Laura	2-24
Bowen, Mary Ellen, Summertown, TN	2-25
Bradshaw, David, Oak Ridge, TN	2-25
Bramlage, Nancy S., Mt. St. Joseph, OH	2-26
Brown, Mira, Burnsville, NC	2-27
Brown, Rick, Sevierville, TN	2-28
Brown, Rick, Sevierville, TN	2-28
Brown, Sandra G.	2-29
Brummett, Matt	2-29
Bryan, Mary, Maynardville, TN	2-30
Burch, Lillian, Knoxville, TN	2-31
Byrd, James, Louisville, TN	2-31
Campbell, Henry, Knoxville, TN	2-32
Carawan, Carolanne M., New Market, TN	2-32
Carden, Fred, Knoxville, TN	2-33
Christiansen, Jennifer, Chazy, NY	2-34
Christoffer, Fred, Knoxville, TN	2-34
Clark, Christopher, Knoxville, TN	2-35
Clark, Donald B., Pleasant Hill, TN	2-35
Clark, Olga, Knoxville, TN	2-38
Corcoran, David, Des Plaines, IL	2-48
Cordell, Terry, Asheville, NC	2-49
Crowe, Charles, Oak Ridge, TN	2-49
Dale, Sigrid, Warren, MI	2-50

Table 1.3-4. Index of Commentors, Private Individuals (*continued*).

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Delap, Ann, Knoxville, TN	2-51
Earley, Patte, Johnson City, TN	2-53
Ezelle, J. Don, Knoxville, TN	2-54
Flagg, Thomas	2-55
Ford, Dean, Knoxville, TN	2-55
Freeman, Jenny, Oak Ridge, TN	2-56
Garvey, Lydia, Clinton, OK	2-56
Gilbert, Constance, Key West, FL	2-58
Gill, Eric, Los Angeles, CA	2-58
Goin, Deborah	2-59
Gordon, Gibson, Knoxville, TN	2-60
Gorenflo, Louise, Crossville, TN	2-60
Gramling, Nicholas, Oak Ridge, TN	2-61
Hagan, Gary, Knoxville, TN	2-62
Hale, Byron H., Clinton, TN	2-63
Hanley, D. Bridget, San Diego, CA	2-64
Hanrahan, Clare, Asheville, NC	2-64
Hardy, Parker, Oak Ridge, TN	2-65
Hargrove, Chris, Louisville, TN	2-66
Heck, Anne, Asheville, NC	2-67
Hensley, Noble	2-68
Hickey, William, Detroit, MI	2-68
Hough, Dennis	2-70
Hubbard, Anne	2-70
James, Alan, Oak Ridge, TN	2-86
Johnson, Pete, Columbus, OH	2-86
Joyner, Ann	2-87
Kapa, Don	2-87
Kavanaugh, John	2-88
Kelly, Bev, Long Beach, CA	2-103
Kemp, David, Alcoa, TN	2-104
Kuykendall, David	2-104
Larson, Jean, Leicester, NC	2-105
Lassiter, Mike	2-105
Lentsch, Mary Dennis, New Orleans, LA	2-106
Lloyd-Sidle, Tricia, Louisville, KY	2-107
Lombardo, Dan, Waterford, MI	2-107
Love, Andy	2-108
Lovelace, Claire, Jonesborough, TN	2-108
Lubthisophon, Ken S., Powell, TN	2-109
Malloy, Randall S., Oak Ridge, TN	2-110
Martin, Mary Kay, Sterling Heights, MI	2-110
Mason, Robert and Marita, Kingston Springs, TN	2-111
Morner, David	2-113
Morris, Jim, Sweetwater, TN	2-114
Munger, David H., Lenoir City, TN	2-118
Murphy, Jennifer, Asheville, NC	2-119
Nobles, Jim, Clinton, TN	2-120
O'Neil, Kay, Le Sueur, MN	2-121
Oehler, Susan, Asheville, NC	2-121
Oliver, Ann McCulloch, Sewanee, TN	2-122

Table 1.3-4. Index of Commentors, Private Individuals (*continued*).

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Patterson, Devin, Knoxville, TN	2-124
Peterson, Allan, Gulf Breeze, FL	2-125
Phillips, J.L.	2-125
Pomerat, Dixie	2-126
Price, Jr., James H.	2-126
Reaves, Candance, Seymour, TN	2-127
Reiter, Jendi, Northampton, MA	2-128
Rickenbach, Nancy, Sevierville, TN	2-128
Rimel, George, Clinton, TN	2-129
Roberts, Stan, Clinton, TN	2-129
Roberts, Stan, Clinton, TN	2-130
Roe, Donald B., Oak Ridge, TN	2-130
Rohlf, Gerard, Pittsburgh, PA	2-131
Ross, Ann	2-132
Rugh, Jim, Sevierville, TN	2-133
Sabbe, Michael, Knoxville, TN	2-133
Schilken, Rege H.	2-134
Schroeder, Helen, Rochester, MN	2-134
Scobie, Jill, Fletcher, NC	2-135
Sellers, Cynthia J., Rutledge, TN	2-135
Shelton, Ronald, Oak Ridge, TN	2-136
Shults, Wilbur, Oak Ridge, TN	2-136
Shults, Wilbur, Oak Ridge, TN	2-137
Smathers, Linda, Asheville, NC	2-138
Smick, Charles	2-139
Smith, Michelle, Asheville, NC	2-139
Smith, Robin, Chattanooga, TN	2-140
Smith, Rodney Bruce	2-140
Southecorvo, Robin, Asheville, NC	2-141
Speciale, Samuel, Asheville, NC	2-141
Stevenson, David, Mars Hill, NC	2-142
Stockwell, Jim, Micaville, NC	2-144
Swan-Dass, Yol, Weaverville, NC	2-145
Thompson, Betty Jo	2-145
Underwood, Mary Lou, Oak Ridge, TN	2-146
Underwood, Scott, Oak Ridge, TN	2-146
Waddell, Tim, Oak Ridge, TN	2-147
Walker, Hazen, Blacksburg, VA	2-147
Weston, Julie, Hailey, ID	2-148
Wilburn, Bill, Oak Ridge, TN	2-149
Wilkin, Frances, Wilmington, OH	2-149
Williams, Bill & Betty, Oak Ridge, TN	2-150
Wilson, Doug, Asheville, NC	2-151
Wilson, Rickey & Yulonda R., Oliver Springs, TN	2-151
Wismer, Amber	2-152
Wurgel, Marge	2-152
Zonar, James P, Knoxville, TN	2-153

Table 1.3-5. Index of Commentors, Organizations and Public Officials.

Commentor Information	Document Page Number
Advanced Management, Inc., Stacy Myers, Oak Ridge, TN	2-119
Anderson County, Rex Lynch, Clinton, TN	2-109
Beck Consulting, Stephen Beck, Knoxville, TN	2-16
City of Knoxville, Bill Haslam, Knoxville, TN	2-66
City of Oak Ridge, Tom Beehan, Oak Ridge, TN	2-17
Delta Research Associates, Jeff Ellis	2-53
ETEBA, Nithin Akuthota	2-2
East Bay Peace Action, Betty Brown, Albany, CA	2-27
Information International Association, Bonnie Carroll, Oak Ridge, TN	2-33
Knox County, Michael Ragsdale, Knoxville, TN	2-127
LOC, Susan Gawarecki, Oak Ridge, TN	2-57
LOC/CAP/ORSSAB, Norman Mulvenon, Oak Ridge, TN	2-118
Lawler-Wood LLC., Wayne Roquemore, Knoxville, TN	2-132
Navarro Research and Engineering, Inc., Samuel Ashworth, Oak Ridge, TN	2-10
Nevada Desert Experience, Jim Haber, Las Vegas, NV	2-62
Nuclear Watch New Mexico, Jay Coghlan, Santa Fe, NM	2-39
OREPA, Ralph Hutchison, Knoxville, TN	2-71
OREPA, Ralph Hutchison, Knoxville, TN	2-76
OREPA, Ralph Hutchison, Knoxville, TN	2-83
OREPA, Ralph Hutchison, Knoxville, TN	2-84
Oak Ridge Chamber of Commerce, Parker Hardy, Oak Ridge, TN	2-65
Oak Ridge Economic Partnership, Kim Denton, Oak Ridge, TN	2-52
Project on Government Oversight, Peter Stockton, Washington, DC	2-142
Roane County, Mike Farmer, Kingston, TN	2-54
Roane State Community College, Gary Goff, Harriman, TN	2-59
Scott County, Ricky Keeton, Huntsville, TN	2-90
Southern Safety Supply, Sara Sizemore	2-138
State of Tennessee, Phil Bredesen, Nashville, TN	2-26
TDEC/DOE-O, John Owsley, Oak Ridge, TN	2-123
Tennessee General Assembly, Randy McNally, Nashville, TN	2-112
Tennessee General Assembly, Ken Yager, Nashville, TN	2-153
Tennessee Valley Authority, William McCollum, Jr., Chattanooga, TN	2-111
The Roane Alliance, Leslie Henderson, Kingston, TN	2-67
Tri-Valley CAREs, Marylia Kelley, Livermore, CA	2-90
Tri-Valley CAREs, Marylia Kelley, Livermore, CA	2-91
U.S. Department of the Interior, Gregory L. Hogue, Atlanta, GA	2-69
U.S. Environmental Protection Agency, Heinz Mueller, Atlanta, GA	2-114
U.S. House of Representatives, Lincoln Davis, Washington, DC	2-50
U.S. House of Representatives, John J. Duncan Jr., Washington, DC	2-52
U.S. House of Representatives, Zach Wamp, Washington, DC	2-148

Table 1.3-6. Index of Commentors, Multiple Signatory Documents.

Multiple Signatory Letter 1			
Document Page Number 2-154			
Roth, Nickolas	Rainwater, Jon	Suellentrop, Ann	Coghlan, Jay
Gordon, Susan	Wilk, Peter	Clements, Tom	Crawford, Lisa
Tomero, Leonor	Brian, Danielle	Arends, Joni	Belisle, Mavis
Culp, David	Young, Stephen	Slater, Alice	Hutchison, Ralph
Paine, Christopher	Davis, Mary	Arends, Joni	
Multiple Signatory Letter 2			
Document Page Number 2-155			
Utsumi, Gyoshu			
Laffan, Sister Denise			
Multiple Signatory Letter 3			
Document Page Number 2-156			
Chopman, Lynn	Prappin, Tony	McLardy, Randy	Thompson, B.
Sharkey, Natalie	Holloway, Clayton	Wells, Terry	and other illegible
Shih, Ann	Huxtable, W.P.	Miller, James	signatories
Multiple Signatory Letter 4			
Document Page Number 2-157			
Coghlan, Jay	Slater, Alice	Gordon, Susan	Mohling, Judith
Clements, Tom	Carroll, Glenn	Rainwater, Jon	Davis, Mary
Crawford, Lisa	Arends, Joni	Belisle, Mavis	Hancock, Don

Table 1.3-7. Campaign Comment Documents.

List of Signatories – CD001 Document Page Number 2-160	
Affeldt, Janet, Sterling Heights, MI	Huthwaite, Motoko, Pontiac, MI
Allers, Joyce, Downers Grove, IL	Johnson, Margaret, Pleasant Ridge, MI
Anderson, Susan, Detroit, MI	Kammer, Majorie, Grosse Pointe Park, MI
Appleton, Doris, Milford, MI	Kish, Charlotte, Detroit, MI
Aronson, Ronald, Huntington Woods, MI	Knaff, Gene, Lathrup Village, MI
Bailey, Virginia, Ann Arbor, MI	Lang, Bob, Highland Park, MI
Bajorek, Eugenia, Oakland, MI	Lawrence, C., Redford, MI
Bakerjian, Garo, Taylor, MI	Lent, Patricia, Royal Oak, MI
Barakat, Yusif, Pinckney, MI	Lisuk, Cynthia, Royal Oak, MI
Bates, James, Detroit, MI	Livermore, Phyllis, Birmingham, MI
Beaupre, Shirley, Detroit, MI	Louchart-Kiefer, L.M., Birch Run, MI
Bedard, Judy, Livonia, MI	Lumpkin, Thomas, Detroit, MI
Beeman, Frances, Ann Arbor, MI	Makara, Robert, Grosse Pointe Farms, MI
Beeman, William, Detroit, MI	Maki, Carol & Carin, Allen Park, MI
Bergier, Kim Joy, Madison Heights, MI	Mandel, Earl, Farmington Hills, MI
Black, Sylvester & Mary, Beverly Hills, MI	Markle, Judy, Grosse Pointe Park, MI
Block, Randy, Royal Oak, MI	Mason, Joyce & Ronald, Farmington Hills, MI
Bross, Madeline, Warren, MI	McCloskey, Alice, Livonia, MI
Brown, Gregory, Detroit, MI	McCreadie, James, Dearborn, MI
Burke, Anne Abbey, Southfield, MI	McDonald, Helen, Southfield, MI
Burris, Barbara, Royal Oak, MI	McIntyre, Barbara, Allen Park, MI
Cressman, Shawn, Farmington Hts, MI	Moix, Cecil, Royal Oak, MI
Dale, Ronald, Warren, MI	Moix, Mary, Lathrup Village, MI
Daniel, Nathaniel & Winnie, West Bloomfield, MI	Nagae, Tim, Ann Arbor, MI
Dotterer, Carol, Charleston, SC	Naranjo, Katherine, Livonia, MI
Dunbar, Leona, Warren, MI	Nevers, Armand & Jane, Detroit, MI
Durivage, Mary Jo, Dearborn, MI	O'Hara-Bruce, Sharon, Lake Orion, MI
Durnell, Maryanne, Troy, MI	Peck, Sally, Livonia, MI
Elliott, J., Livonia, MI	Perlman, Lorraine, Ferndale, MI
Fanone, Sarah Martin, Warren, MI	Perreault, Laura, Southfield, MI
Femminineo, Evelyn, Clinton Township, MI	Pfeifer, Mary Ann, Clinton Township, MI
Fetter, Margaret, Livonia, MI	Piccone, Irene, Northville, MI
Foremen, Evelyn, Detroit, MI	Plexco, Michelina, Warren, MI
Fortuna, Elizabeth, Grosse Pointe Park, MI	Rashid, Elizabeth, Dearborn, MI
Foyle, Lois, Ann Arbor, MI	Ratkowski, Mary, Detroit, MI
Frucci, Pamela, Grosse Ile, MI	Rayes, Lina, Livonia, MI
Fuqua, Jean	Redhead, Marion, Madison Heights, MI
Geary, Frances, Ferndale, MI	Redigan, Kimberly, Dearborn Heights, MI
Gepford, William & Barbara, Livonia, MI	Redoutry, Mary & Larry
Gilbert, Marilyn, Southfield, MI	Reinstein, Carl & Stella, Detroit, MI
Glowacki, Donna, Lake Orion, MI	Riley, Martha, Walled Lake, MI
Gray, S.	Rosemond, Ernestine, Detroit, MI
Green, David, Farmington Hills, MI	Roshid, Margaret, Detroit, MI
Grimm, A. J., St. Clair Shores, MI	Rouleau, H.G., Janice & Marguerite, Rochester, MI
Gunning, Catherine, Berkley, MI	Sayers, Edward, Oak Park, MI
Haber, Odile, Ann Arbor, MI	Schiff, Bernard, Huntington Woods, MI
Halstead, Ron, Royal Oak, MI	Schwartz, Joann, Eastpointe, MI
Hirami, Ann-Nora, Plymouth, MI	Sears, Charlie & Marge, Berkley, MI
Hirami, Soichiro & Cynthia, Livonia, MI	Seavitt-Conway, Diane, Royal Oak, MI
Hughes, Mary, Alpena, MI	Sellman, Geraldine, Detroit, MI
Seymour, Mary, Dearborn, MI	Swanson, Carol, Warren, MI
Shor, Fran, Royal Oak, MI	Thompson, Judith, Detroit, MI

Table 1.3-7. Campaign Comment Documents (*continued*).

Sibert, Unknown, Canton, MI	Thornburg, P., Belleville, MI
Simons, Rudy, Berkley, MI	Tyson, Margaret, Bloomfield Hills, MI
Simpson, Linda, Huntington Woods, MI	Waitkus, Letitia, Grosse Pointe Park, MI
Sims, Armethia, Ypsilanti, MI	Walker, Donna, Detroit, MI
Sisler, Robert, Detroit, MI	Webb, Judith, Madison Heights, MI
Smith, Flora, Walled Lake, MI	Williams, Mary, Detroit, MI
Spyker, Daniel Duane, Detroit, MI	Wohlford, Pauline, Livonia, MI
Stokes, Harold, Redford, MI	Wylie-Kellerman, Bill & Lydia, Detroit, MI
Strom, Harold & Shirley, Southfield, MI	
List of Signatories – CD002	
Document Page Number 2-160	
Barri, Georgia, Peoria, AZ	Marable, Michael, Oak Ridge, TN
Brittelli, Jr., Ralph, Atlanta, GA	Moorman, Benjamin, Knoxville, TN
Clapham, Martin, Knoxville, TN	Pressnell, David, Oak Ridge, TN
Gardner, Fred	Short, Rex, Oak Ridge, TN
Gingrich, Jay	Tuck, Michael, Knoxville, TN
Hollander, Cindy, Knoxville, TN	Ward, Robert, Clinton, TN
Long, Jan	
List of Signatories - CD003	
Document Page Number 2-161	
Dubord, John, Milwaukee, WI	Rooney, Eleanor, Detroit, MI
Hirami, Ann-Nora, Plymouth, MI	Rooney, Charles, Detroit, MI
Kloser, Beth, Detroit, MI	Sears, Charlie & Marge, Berkley, MI
List of Signatories - CD004	
Document Page Number 2-161	
Fleck, Lawrence & Helen, Scotts, MI	
Macks, Vic & Gail, St. Clair Shores, MI	
List of Signatories - CD005	
Document Page Number 2-162	
Burnett, Brian	Surdyka, Cindy
Dougtry, Sheila	Utterback, Julie
Rhodes, Chris	Ward, Leis
List of Signatories - CD006	
Document Page Number 2-163	
Baker, Gaylord	Gagliano, Sarah
Bron, Evelyn	Gilman, Steven
Clark, Brita	Grant, Chris
Clere, Jodi	Hartnett, Kate
Clere, Daniel	Hibshman, Doug
Cutter, Beverly	Jackson, Allison E.
Davis, Melissa	Joyner, John
Davis, Mike	Kampen, Maureen
Dean, Allan	Karpen, Leah
Drenst, Stanley	Lenfeld, Donald
Elkins, Melinda	Lohnes, Donner
Eller, Tommy	Majka, Richard
Ellis, Mike	Martin, W. Robert, Jr.
McClure, David	Richter, Hank
McClure, Maureen	Richter, Jane

Table 1.3-7. Campaign Comment Documents (*continued*).

Moodie, Margaret	Roderick, Susan
Moore, Thomas	Rose, John
Olevnik, Judith	Semlak, Gary
Olevnik, Peter	Tanner, Amie
Olson, Mary	Tiger, Pamela
Patrie, Lew	Todd, Patricia
Patrie, Jeannette	Walton, Richard
Peterson, Larry	Walton, Susan
Petrequin, Nancy	Wilkins, Stefanie
Pirie, Gordon	Williamson, Nancy
Richardson, Don	Wright, Mariah
List of Signatories - CD007	
Document Page Number 2-163	
Rosenthal, Jeanie	
Simon, Arthur, Bowie, MD	

Table 1.3-8. Comments Sorted by Summary Code.

Category Code	Issue Category	Document Page Number[a]
1.A	Nuclear Posture Review, JASON Report	2-76, 2-91, 2-142, 2-154, 2-165, 2-168
1.A.1	Size of Projected U.S. Stockpile	2-22, 2-39, 2-157, 2-71, 2-76
1.B	Presidential Directives, Public Law, and Current Policies	2-30, 2-31, 2-60, 2-62, 2-110
1.B.1	Moscow Treaty, Treaty of 2010	2-76
1.C	Treaty on Nonproliferation; Zero Weapons	2-16, 2-23, 2-26, 2-30, 2-76, 2-110, 2-141, 2-144, 2-148, 2-149, 2-165, 2-166
1.D	New Weapons	2-39, 2-62, 2-76
1.E	Proliferation and Nonproliferation	2-15, 2-28, 2-28, 2-39, 2-50, 2-53, 2-58, 2-62, 2-71, 2-76, 2-91, 2-121, 2-125, 2-133, 2-134, 2-135, 2-141, 2-141, 2-155, 2-148, 2-151, 2-164, 2-165, 2-168
1.E.1	SWEIS Should Include Proliferation Analysis	2-27, 2-157, 2-76, 2-168
1.F	International Relations	2-166
2.A	General NEPA Process and Compliance	2-69, 2-167, 2-168
2.B	Length of Comment Period, Number/Location of Public Hearings	2-76, 2-90, 2-154, 2-165, 2-167
2.E	Public Hearing Process	2-76, 2-83
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Table 1.3-8. Comments Sorted by Summary Code (*continued*).

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12.J.1	Cancer to Workers	2-165
12.J.2	Health of Surrounding Oak Ridge Area	2-165
12.J.3	Release of Materials	2-39, 2-157, 2-76
12.J.4	Uranium Discharge	2-39, 2-76
12.L	Waste Management	2-39, 2-76, 2-114, 2-141, 2-164
12.M.1	Seismic and Natural Phenomena	2-39, 2-157, 2-71, 2-76

Table 1.3-8. Comments Sorted by Summary Code (*continued*).

Category Code	Issue Category	Document Page Number[a]
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12.O	Past Contamination at Y-12	2-19, 2-27, 2-28, 2-28, 2-39, 2-157, 2-49, 2-60, 2-67, 2-71, 2-76, 2-91, 2-112, 2-119, 2-132, 2-145, 2-152, 2-166
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12.T.23	Appendix G	2-84
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Table 1.3-8. Comments Sorted by Summary Code (*continued*).

Category Code	Issue Category	Document Page Number[a]
13.0	General Supporting Comments	2-4, 2-5, 2-5, 2-6, 2-7, 2-7, 2-8, 2-10, 2-15, 2-16, 2-17, 2-19, 2-25, 2-26, 2-29, 2-31, 2-33, 2-156, 2-35, 2-50, 2-52, 2-54, 2-54, 2-59, 2-60, 2-61, 2-62, 2-63, 2-65, 2-65, 2-66, 2-67, 2-68, 2-70, 2-86, 2-90, 2-104, 2-105, 2-109, 2-111, 2-112, 2-119, 2-120, 2-124, 2-125, 2-126, 2-127, 2-129, 2-129, 2-132, 2-132, 2-133, 2-136, 2-137, 2-136, 2-138, 2-140, 2-140, 2-146, 2-146, 2-147, 2-148, 2-151, 2-153, 2-164, 2-165, 2-167
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15.0	Out of Scope Comments	2-35, 2-139
15.A	Evaluate Use of Nuclear Weapon	2-165
16.A	ROD Suggestions	2-76
16.B	Uranium Mining	2-91

a – the page numbers indicate the starting page of each comment document containing the associated category code.

COMMENT RESPONSE DOCUMENT, CHAPTER 2: COMMENT DOCUMENTS

This chapter is a compilation of all the documents that the National Nuclear Security Administration (NNSA) received on the *Draft Site-Wide Environmental Impact Statement for the Y-12 National Security Complex* during the public comment period. The documents are presented alphabetically by commentor's last name. On each document the first number represents the comment number within that document and the second number represents the issue summary code assigned to this comment. This number can be used to locate the summary and response relating to this comment. Section 1.3 describes the organization of the Comment Response Document (CRD) and discusses the tables provided in Chapter 1 to assist readers in tracking their comments to the respective comment summary and response. Comments that were received on the Wetland Assessment of the haul road extension are also contained in this CRD.

Akins, Darrell

Page 1 of 1

WD065

[redacted]

From: Darrell Akins [DAkins@akinscrisp.com]
Sent: Friday, January 08, 2010 2:34 PM
To: DIV.Y12SWEIS.Comments
Subject: SWEIS Comment

Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike
Suite A-500
Oak Ridge, TN 37830

Dear Ms. Gorman:

1|7.0 As a resident and business owner in Oak Ridge, I support Alternative 4, Capability-Sized UPF Alternative, at the Y-12
2|12.P National Security Complex, and the construction of the Complex Command Center. Additionally, I support the IFDP effort as a critical component to the overall future success of Y-12. Y-12's mission is critical to the security of our country and these projects are vital to Y-12. Thank you.

Darrell Akins, Chairman & Partner
AkinsCrisp Public Strategies
173 Mitchell Rd.
Oak Ridge, Tennessee 37830

Home address:
102 Crest Pointe Lane
Oak Ridge, Tennessee 37830

1

Akuthota, Nithin

Page 1 of 4

WD101

[redacted]

From: Nithin Akuthota [nithin@eteba.org]
Sent: Friday, January 29, 2010 1:58 PM
To: DIV.Y12SWEIS.Comments
Subject: Y-12 SWEIS Public Comments - ETEBA
Attachments: ETEBA Y-12 SWEIS Written Comments.pdf; ETEBA Y-12 SWEIS Written Comments

Importance: High

1|7.0 Please review the attached comments from ETEBA in support of NNSA's preferred alternative for the modernization of the Y-12 National Security Complex. Please contact us with any questions.

Nithin

Nithin Akuthota
Executive Director
Energy, Technology and Environmental
Business Association (ETEBA)
(P) 202.360.9210
(F) 202.747.5731
nithin@eteba.org

1

Akuthota, Nithin

Page 2 of 4

WD101

ETEBA energy, technology and environmental business association
www.eteba.org

January 28, 2010

Ms. Pam Gorman
Y-12 SWEIS
Document Manager
800 Oak Ridge Turnpike
Suite A500
Oak Ridge, TN 37830

RE: Draft Site-Wide Environmental Impact Statement for the Y-12 National Security Complex (SWEIS)

Thank you for the opportunity to comment on the Draft Site-Wide Environmental Impact Statement (SWEIS) for the Y-12 National Security Complex. The Energy, Technology & Environmental Business Association (ETEBA) is a 501c(6) nonprofit trade association, which has been active in Oak Ridge for over twenty years. ETEBA is comprised of more than 200 businesses that provide services to the Department of Energy (DOE) and the National Nuclear Security Administration (NNSA). According to a 2007 economic impact study conducted by Dr. Matt Murray, ETEBA companies generated over 16,000 jobs in Tennessee (including the effect of multipliers) and a total income of $1.3 billion.

Over the years, ETEBA has participated in numerous NEPA proceedings and community workshops involving Oak Ridge's federal facilities. As many ETEBA companies currently work or have done work at Y-12, our organization is well-positioned to provide comments on the proposed Draft SWEIS currently before us today. This document is an important document in the Y-12 decision-making framework. It constitutes the most recent and comprehensive summary of the purpose and need for future missions at Y-12 and the related environmental and regulatory considerations associated with the proposed actions.

1|7.0 (cont) For the record, ETEBA would like to state its support of the "Capability-Sized UPF Alternative", which is the NNSA's preferred alternative. However, ETEBA and its member companies stand ready to implement whichever alternative is decided upon in the final record of decision, and would encourage maximum subcontracting opportunities during implementation.

2|13.b We would also like to take this opportunity to make the following points for the record: (1) the continued operation of Y-12 is critical to the national security of the United States; (2) Y-12 must be modernized to ensure a safe, secure, and reliable stockpile of nuclear weapons; and (3) the Integrated Facilities Disposition Project is key to Y-12 modernization and must be fully incorporated into the ROD

1

Akuthota, Nithin

Page 3 of 4

WD101

(1) The continued operation of Y-12 is critical to the national security of the United States;

The continued operation of Y-12 is critical to DOE NNSA's Stockpile Stewardship Program and to preventing the spread and use of nuclear weapons worldwide. Y-12 is key to the national interest in maintaining a safe, secure, and reliable stockpile of weapons in the most effective and efficient manner.

2|3.b (cont) Specifically, the construction of the uranium Processing Facility (UPF) is the integral component to the modernization of the Y-12 complex. UPF, as described in the preferred "capability-sized" alternative, would achieve the following:

- Consolidate all enriched uranium production operations from 8 old large facilities;
- Achieve lean, agile, affordable manufacturing;
- Eliminate safety and environmental risks of old facilities and infrastructure;
- Apply advanced technology for safety, security, quality, and efficiency;
- Achieve cost effective compliance with Graded Security Protection Policy requirements;
- Enable reduction of the high security area by 90%, from 150 acres to 15 acres; and
- Reduce annual operating cost by $205M/Yr

2|3.b Construction of the UPF will replace decrepit old facilities that are environmental and worker safety risks. It would also support NNSA's Supplemental Programmatic Environmental Impact Statement (SPEIS), which designated Y-12 Site as the Uranium Center of Excellence. The Highly Enriched Uranium Materials Facility (HEUMF), which has been constructed and is operational, will support UPF operations.

2|3.b (cont) UPF at Y-12 would also ensure Quality Assurance needed to continually assess our stockpile through surveillance measures. It will also provide uranium feedstock to Naval Reactors, for which Y-12 is the only source. Moreover, it will preserve the nation's capability to produce nuclear weapons again if needed. Finally, the capability-sized UPF supports continued dismantlement of nuclear weapons components, which is essential to complying with arms-control agreements and reducing the backlog of materials in storage. Several retired weapon systems are planned for dismantlement during the next five years.

(2) Y-12 must be modernized to ensure a safe, secure, and reliable stockpile of nuclear weapons; and

2|3.b (cont) Continued operation of Y-12 is made more difficult because most of the facilities at Y-12 are old, oversized, and inefficient. Over time, nearly all Y-12 facilities will need to be replaced with structures designed for their intended present-day use. According to the SWEIS, modernizing this old, over-sized, and inefficient infrastructure is a key strategic goal of DOE NNSA and is consistent with strategic planning initiatives and prior programmatic NEPA documents.

! #

Akuthota, Nithin

Page 4 of 4

WD101

(3) The Integrated Facilities Disposition Project is key to Y-12 modernization efforts and must be fully incorporated into the ROD

The IFDP estimates that over the next 15-25 years, 3.9 million square feet of contaminated floor space will become excess as a result of NNSA Modernization and the relocation of NE and SC facility activities to ORNL. Under the IFDP, the D&D of approximately 188 facilities at ORNL, 112 facilities at Y-12, and remediation of soil and groundwater contamination would occur over the next 30 to 40 years.

3|12.P According to the SWEIS, benefits of the IFDP include reduced risk to workers and the public from potential exposure hazardous and radioactive materials; and the reduction of surveillance and maintenance costs for obsolete, inactive facilities. On June 21, 2007 a Critical Decision (CD)-0 was approved. Approval of the CD-1 package is expected in early 2009.

D&D, as envisioned by the IFDP, is a vital piece to the Y-12 modernization efforts because it:

- Eliminates excessive S&M costs & ES&H liabilities and risks to the workforce
- Improves effectiveness and efficiency of site, soil, and groundwater remediation
- Improves plant security buffer. Stops the legacy mercury source (e.g. Alpha 4 & 5)

ETEBA believes that Y-12 cleanup and footprint reduction should be more fully integrated into the final SWEIS and subsequent Record of Decision.

Conclusion

ETEBA supports the capability-sized UPF alternative and believes that (1) the continued operation of Y-12 is critical to the national security of the United States; (2) Y-12 must be modernized to ensure a safe, secure, and reliable stockpile of nuclear weapons; and (3) the Integrated Facilities Disposition Project is key to Y-12 modernization and must be fully incorporated into the ROD. We look forward to maintaining an active dialogue with NNSA on items of mutual interest with respect to the site-wide environmental evaluation for the Y-12 National Security Complex, and would be pleased to answer any questions the agency has on our comments.

Sincerely,

Nithin Akuthota
Executive Director

3

Anderson, Dave

Page 1 of 1

OR1D05

Draft Y-12 Site-wide
Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

NNSA National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010

1|13.0 I SUPPORT THE Y12 ~~SWEIS~~ BEING ACT 4 PROPOSED. IN TODAY'S WORLD WE NEED A STRONG DEFENSE AND THE INFRASTRUCTURE TO SUPPORT IT. THE CURRENT FACILITIES Y12 WERE

2|3.B BUILT DURING COLD WAR AND MAKE THE EFFORT TO BE A MODERN FACILITY WITH UPTODATE MANUFACTURING EQUIPMENT AND ASSOCIATED IMPROVEMENTS WORKER SAFETY. IMPROVEMENTS IN WORKER SAFETY AND PUBLIC SAFETY ARE AS IMPORTANT AS DEVELOPING MODERN FACILITY I COMMEND NNSA AND CONTRACTORS IN COORDINATING IMPROVEMENTS AT Y12 SITE AND BUILDING UPF ETC.

DAVE ANDERSON

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at
http://www.Y12sweis.com

Angelo, Peter

Page 1 of 1

MD040

Draft Y-12 Site-wide
Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010.

The United States has relied on an effective nuclear deterrent since the end of World War II. Associated with this reliance, there has been a stockpile of uranium that remains a national asset. As the stockpile eases the greater good, so should handling, processing and manufacture of product (substitute defense, or energy) associated with this material safely and securely. A Uranium Process Facility, modernized and fully compliant to existing federal requirements is required for the next hundred years. Uranium products produced in the current suite of facilities are likewise to pressing regulatory burdens, and provides little assurance processes and commitments will continue effectively in a changing world.

1|3.B

The proposed new Uranium Processig Facility consolidates many diverse uranium processg and manufacturing operations to compliment the newly constructed HEUMF. The UPF - HEUMF tandem provides for effective management of all operations involvg uranium safely and securely.

2|13.0

It is a moral imperative to leave as a legacy to future generations over the this century, the effective means to handle, process, and store uranium. The effective processig capability, fully compliant to federal regulations and requirements can only be demonstrated by a new, integrated and modernized UPF. The logical location is at the Y-12 Natl Security Complex.

2|13.0 (cont)

Sincerely,
Dr. Peter Angelo
Oak Ridge TN

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:
http://www.Y12sweis.com

Anonymous, Anonymous

Page 1 of 1

MD041

Draft Y-12 Site-wide
Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010.

1|13.0

BUILD IT
The OLD ONE IS
IN ROTTEN Shape

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
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You may also submit comments through the project website which can be found at:
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Anonymous, Anonymous

Page 1 of 1

MD045

Draft Y-12 Site-wide
Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010.

1|13.0 I Thinks we need one!

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
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y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:
http://www.Y12sweis.com

Anonymous, Anonymous

Page 1 of 1

MD047

Draft Y-12 Site-wide
Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010.

1|5.0 I think they should go with alternate # (2) UPF Alternate. Even though NNSA preferred choice is #4 capability sized UPF alternate my reason is that they should just do it right & completely the 1st time. The facilities are aging and by the time the new facility is complete the old facilities will have difficulties maintaining capabilities

2|14.0 The other 3 options should not be considered for the protection and needs for Sum

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:
http://www.Y12sweis.com

Anonymous, Anonymous

Page 1 of 1

MD048

Draft Y-12 Site-wide
Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

NNSA National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010.

1|13.0 It would be a great step for This Country Make Safety

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:
http://www.Y12sweis.com

Anonymous, Anonymous

Page 1 of 1

MD049

Draft Y-12 Site-wide
Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

NNSA National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010.

1|13.0 I imagine that most people in opposition to the new UPF are unaware of the deteriorating conditions of Y-12's current facilities and do not view UPF as a means to carry on and increase the dismantlement work that they so advocate. I strongly agree that UPF in its fullest extent is necessary to meet the countries goals in a safe and efficient manner.

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:
http://www.Y12sweis.com

Anonymous, Anonymous

Page 1 of 1

MD051

Draft Y-12 Site-wide
Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010.

1|13.0 We have the technolgy here we need to keep it here

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:
http://www.Y12sweis.com

Anonymous, Anonymous

Page 1 of 1

MD052

Draft Y-12 Site-wide
Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010.

CONTINUING TO SUPPORT THE MODERNIZATION OF THE Y-12 NATIONAL SECURITY COMPLEX SHOULD BE A PRIORITY FOR DOE AND THE U.S.

1|7.0 I SUPPORT OPTION 4 TO PROVIDE THE UPF AND THE COMPLEX COMMAND CENTER.

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:
http://www.Y12sweis.com

Armstrong, Monica

WD070

[redacted]

From: Monica Armstrong [reddoormama@gmail.com]
Sent: Friday, January 22, 2010 11:29 AM
To: DIV.Y12SWEIS.Comments
Subject: Citizen Comment

1|10.D I oppose spending $3 billion of my - and other taxpayers' - money for a "modernized" nuclear weapons plant in Oak Ridge, TN.
2|14.0 I support the dismantling of nuclear warheads, not the building of new secondaries.

Thank you for taking my views into consideration in making your final determination. Monica Armstrong

Arnshek, Angela

WD090

[redacted]

From: Al Grooms [sswoo2do@yahoo.com]
Sent: Wednesday, January 27, 2010 2:59 PM
To: DIV.Y12SWEIS.Comments
Subject: orepa 6

1|9.A Please don't build the 3.5 billion dollar facility at Oak Ridge in Tennessee, but instead build OREPA alternative 6.

Thank you for your time and consideration.
Angela Arnshek
46 Coleman Ave
Asheville NC

Ashworth, Samuel

Page 1 of 1

WD055

[redacted]

From: Ashworth, Samuel C (SA5) [ashworths@y12.doe.gov]
Sent: Monday, December 21, 2009 1:13 PM
To: DIV.Y12SWEIS.Comments
Subject: Form posted from Windows Internet Explorer.

firstName=Samuel
lastName=Ashworth
organization=Navarro Research & Engineering email=ashworths@y12.doe.gov address1=120A Arcadian Lane address2= city=Oak Ridge state=TN zip=37830 country=US subject=Draft Y-12 SWEIS comments=My comments are in favor of the Y12 UPF. I have worked in nuclear processing for over 30 years, including uranium, plutonium, rare gases, environmental cleanup, operations, research, and design. I have BS/MS in chemical engineering, a PhD in mathematics, and registered as a professional engineer in several states. In my professional and personal opinions, I believe the new facility is imperative for the U.S. energy and military strategies. Many of the plants I worked in, which were safely operated, are now closed with no plans of reopening. Our nuclear capabilities have severely deminished since I first started in the nuclear industry. I also worked for the French government. They have done the opposite and are now approximately 60% energy independent using nuclear energy in France. When the US dropped the ball, France and other countries ran with it and have made enormous progress in engineering, safety, power, and radionuclide/waste management. This is where the US should be and the new UPF is a step in the right direction. Enriched uranium is a very valuable resource and needs to be preserved not dwindled away by further plant closures and cancelled projects.
draftcd=Draft CD-Rom Only

1|3.B

1

Bane, Ken

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MD044

Draft Y-12 Site-wide
Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

NNSA National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010.

1|13.0

I fully support this project
We need this facility

Ken Bane
Ph. 865-435 6676

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:
http://www.Y12sweis.com

Barakat, Yusif

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WD094

[redacted]

From: yusif barakat [yusifpeace@gmail.com]
Sent: Thursday, January 28, 2010 2:25 PM
To: DIV.Y12SWEIS.Comments
Subject: Comments for Y-12 SWEIS
Attachments: Yusif's_Testimony_at_Y-12_on_2-26-2008.doc

Dear Pam Gorman,

Though I know you must be overwhelmed with comments, especially as the deadline is tomorrow, I want to be sure you receive the attached as my submission for this current public comment period for the Y-12 SWEIS.

1|9.A I support OREPA's "Alternative 6" and pray it is not only seriously considered by will be adopted.

Thank you for all your work on this huge project.

Yusif Barakat
10836 Monticello
Pinckney, MI 48169-9326

1

Barakat, Yusif

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WD094

TESTIMONY REGARDING THE CONTINUED MANUFACTURING OF NUCLEAR WEAPONS
by Yusif Barakat

OAK RIDGE, TENNESSEE
FEBRUARY 26, 2008

SPEAK TRUTH TO POWER
EMPOWER THOSE WHO SPEAK TRUTH

SALAAM ALAYKUM: I am aware of the many people that support spending 200 billion dollars of our tax money to build a new plant for the sole purpose of manufacturing nuclear weapons. (Bombs of Mass Destruction) I understand and sympathize with those who support this project because they are interested in MAKING A LIVING!
I am here to talk about PRESERVING LIFE!

Nuclear bombs have only one purpose--- to destroy life and damage the earth!
Nuclear weapons should not be used for making a living.

NUCLEAR WAEPONS, LIKE ALL "WEAPONS OF MASS DESTRUCTION",
SHOULD BE ABOLISHED FROM THE EARTH!

I know that you are only the Nuclear Commission and I am not here talk to you about Atomic Energy or Nuclear Bombs. I know you are only a piece of the puzzle. I want to talk to you about the whole puzzle --- not just the piece you are responsible for. I want to talk to you about the "whole pie."

I am not going to bore you with data, statistics and details, as I am sure you have heard them all!
I am here to talk about:
CRIMES AGAINST HUMANITY!
I am here to remind you about:
CRIMES AGAINST NATURE AND THE EARTH!

I know if you had a chance to talk to me -- you would tell me, how it is all about my security ---
I know you would tell me all about the ENEMY (that YOU have created) and that what you are proposing is supposed to make me feel more safe and secure! I know that you will tell me that, this is all for my protection!

I ASK YOU, WHO WILL PROTECT ME FROM MY PROTECTORS?
I do not give you permission to do this. DO NOT DO THIS IN MY NAME!

I would like to show you the scroll from this pen, which I will leave with you, along with two charts of our federal spending, as a token of my appreciation for allowing me the time for this presentation.

1

Barakat, Yusif

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WD094

Barakat, Yusif

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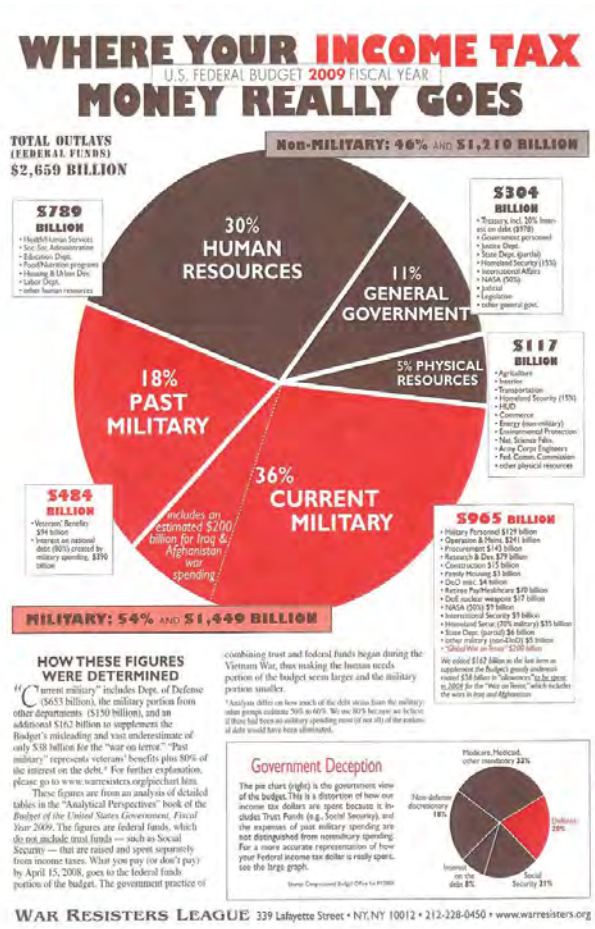

Barakat, Yusif

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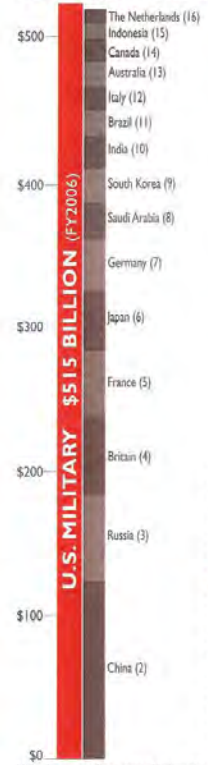
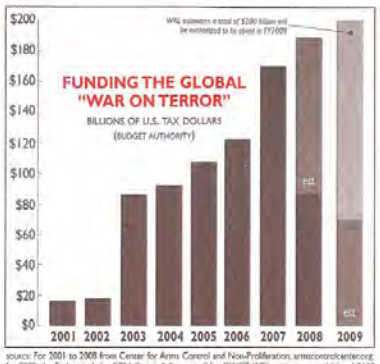
WD094

ARE WE SAFE YET?

U.S. Military vs. The World



U.S. military spending – Dept. of Defense plus nuclear weapons (in $billions) – is equal to the military spending of the next 15 countries combined. SOURCE: Center for Arms Control and Non-Proliferation, armscontrolcenter.org



FUNDING THE GLOBAL "WAR ON TERROR"

BILLIONS OF U.S. TAX DOLLARS (BUDGET AUTHORITY)

SOURCE: For 2001 to 2008 from Center for Arms Control and Non-Proliferation, armscontrolcenter.org. For 2009, the Budget includes $70 billion in "allowances" for GWOT; WRL estimates an additional $130 billion will be authorized for spending in 2009 and subsequent years, making the total authorized $200 billion. This graph shows Budget Authority, while the pie on the front is Outlays.

WHAT YOU CAN DO

• Leaflet with this flyer between now and Tax Day, Tuesday, April 15, 2008. There are peace groups around the country — get out and be visible against the war!

• Write the President and Congress and demand that war money be used for services instead. Write letters to the editor of your local paper. **Send them copies of this flyer.**

• **Protest with your money!** Sign up at **wartaxboycott.org**. Refuse to pay all or part of your income tax. Whatever you choose to refuse—$1, $10, the 7% that pays for wars in Iraq and Afghanistan, or more — send a letter to elected officials and tell them why. Though illegal, thousands of people openly participate in this form of protest. You can take control of your paycheck and avoid contributing to the military. Contact us for information or referral to a counselor near you. Contribute resisted tax money to organizations working to help people, provide needed services, or care for victims of war.

• For more about refusing to pay for war, contact the National War Tax Resistance Coordinating Committee, PO Box 150553, Brooklyn, NY 11215, (800) 269-7464; www.nwtrcc.org. Support the Peace Tax Fund bill to allow 100% of your taxes to fund nonmilitary programs: (888) 732-2382; www.peacetaxfund.org.

• Support military personnel who refuse to fight in Iraq and Afghanistan. For more information see www.ivaw.org or www.girights.org. Call the GI Rights Hotline if you are in the military and need help: 800-394-9544.

RESOURCES

• Additional copies of this leaflet are available for 10¢ each (1-199), 7¢ each (200 - 499), 6¢ each (500+) plus 20% postage or call for exact amount.

• For sample brochures and resources on war tax resistance, send a self-addressed stamped (63¢) envelope to War Resisters League at the New York address below.

• *War Tax Resistance: A Guide to Withholding Your Support from the Military*, 144-page handbook with history, methods and resources. $15 plus $2.50 media mail or $4.60 priority mail.

LOCAL CONTACT:

WAR RESISTERS LEAGUE
339 Lafayette Street, New York, NY 10012
Tel (212) 228-0450
Fax (212) 228-6193
wrl@warresisters.org
www.warresisters.org

Barakat, Yusif

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WD094

Ladies and Gentlemen: What you are proposing is a crime against humanity and you are responsible for it! Spending 50% of our tax dollars and of the earth's resources on killing machines and nuclear bombs, that only kill people, destroy their homes and land and pollute the earth for millions of years IS AN INSANITY!

2|10.D Spending trillions of dollars on wars and nuclear arsenals, while the world is suffocating --- while the majority of the world's population are diseased, homeless and hungry --- not counting the ones we slaughter in the process –IS NOT ONLY LUNACY --- IS NOT ONLY A CRIME AGAINST HUMANITY --- IT IS A CRIME AGAINST GOD AND CREATION!

IT MUST BE STOPPED!

We must convert the earth's precious resources to care for all of humanity and the preservation of Mother Earth!

CAN YOU IMAGINE A WORLD THAT WORKS FOR ALL?

I was born in Haifa in 1935. I became a Palestinian Refugee in '47, at the age of 12.
I have been in America for 60 years --- and what I have learned, is that:

MIGHT DOES NOT MAKE RIGHT!
THE END DOES NOT JUSTIFY THE MEANS!
EQUAL DOES NOT MEAN SAME!

Einstein said it best:
"YOU CAN NOT SOLVE A PROBLEM WITH THE SAME MINDSET THAT CREATED IT!"
That statement especially applies to the ancient tradition of solving conflict by waging war. War is not the answer, war is the problem.

Imagine if all money spent on war and armaments, including the nuclear arsenal, was used to build up nations instead of destroying them! Imagine how it would be if that money was used to help people raise crops, build schools and hospitals; fight disease and poverty. The world (spurred on by the United States) operates under the **paradigm of having**….and having is never enough! Capitalism, corporate greed and avarice; putting profits ahead of people and economics ahead of humanity; colonialism and occupying other peoples' land are all self –defeating propositions. The expenditure of human and environmental resources and military spending, is lopsided, and results in killing and destroying innocent people and their possessions.

IMAGINE, if we can convert to the **paradigm of being** where people are ahead of profits, where humanity is ahead of economics….IMAGINE, how wonderful the world could be…not only for us but **for all humanity**!

The major fear is terrorism…but we are creating terrorism and we are committing terrorism! There is such a thing as **state-sponsored terrorism!** Prime examples are the U.S. invasion of Iraq and the Israeli invasion and occupation of Palestine! The peoples' only response under such immense show of force is to protect themselves, their families, homes and land, is to fight back through unconventional terrorists acts!

REMEMBER: WAR IS THE TERRORISM OF THE RICH AND TERRORISM IS THE WAR OF THE POOR!

We must develop a new mind set from which can spring a new age of sharing resources and focusing on human needs. We must stop our own terrorist acts before we can ask others to do the same! We must stop building nuclear weapons before we can ask others to do the same. AMERICA MUST BE THE SHINING EXAMPLE TO LEAD THE WORLD INTO A NEW DAWN OF PEACE!

Barakat, Yusif

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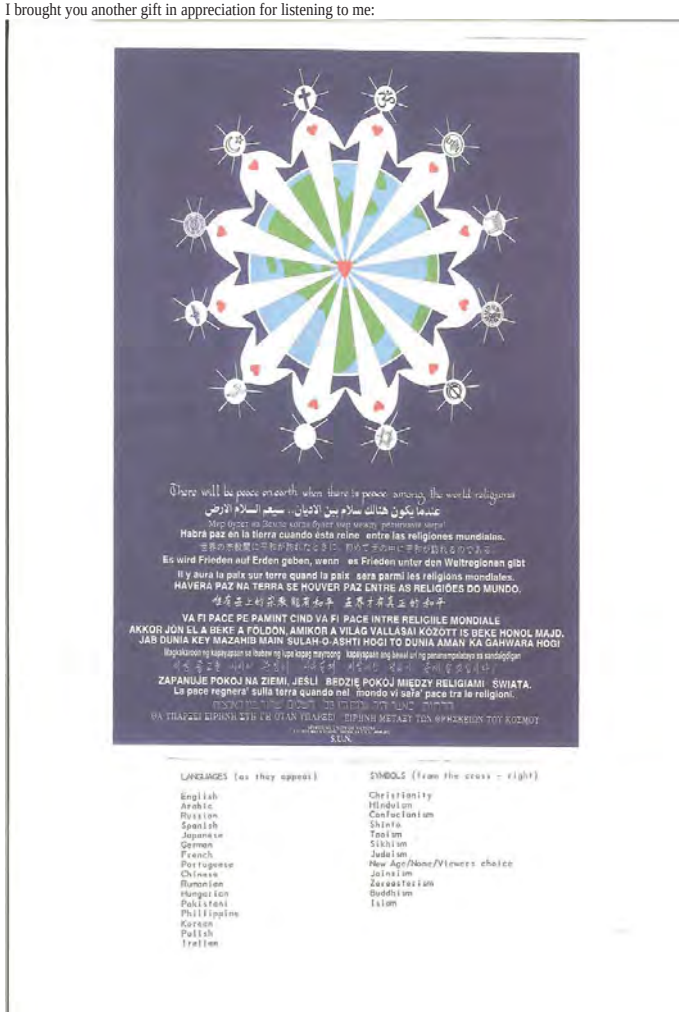
WD094

I brought you another gift in appreciation for listening to me:



6

Barakat, Yusif

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WD094

THERE WILL BE PEACE ON EARTH, WHEN THERE IS PEACE
AMONGST THE WORLD RELGIONS!

I want to ask you:
IF JESUS WAS STANDING IN FRONT OF YOU --- WOULD YOU RECOGNIZE HIM?

IF JESUS WAS TESTIFYING HERE, WOULD HE APPROVE OF YOUR PROJECT?

I want to leave you with Chief Seattle's Native American Prayer and a comment from The Dalai Lama --- to guide you to your higher awareness--- and lead you to your~
CHRIST/BUDDHA CONSCIOUSNESS!

I KNOW THAT FROM THAT PLACE
YOU WILL BE GUIDED TO DO THE RIGHT THING!

****

Teach Your Children….

that the earth is our mother.
Whatever befalls the earth befalls the
sons and daughters of the earth.

This we know.
The earth does not belong to us;
We belong to the earth.
This we know.
All things are connected-
like the blood which unites one family.
All things are connected.

Whatever befalls the earth
befalls the sons and daughters of the earth.
We did not weave the web of life;
We are merely a stand in it.
Whatever we do to the web,
we do to ourselves!

****

Global Peace can not occur all at once. All of us, every member of the world community, has a moral responsibility to help avert immense suffering…no one can afford to assume that someone else will solve our problems. Every individual has a responsibility to help guide our human family in the right direction. Good wishes are not sufficient. We must assume responsibility! Since periods of great change, such as the present one, comes so rarely in human history, it is up to each and every one of us to use our time well to help create a happier more peaceful world!

SALAAM ALAYKUM

Respectfully submitted:
Yusif Barakat
yusifpeace@gmail.com

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Barker, Lawrence

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MD033

Ada Chapel

Grant Street
Wilmington, Ohio 45177

December 17, 2009

Pam Gorman
Y-12 Sweis Document Manager
Y-12 Site Office
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, Tennessee 38730

Dear Pam Gorman:

1|1.E We have learned of what appears to be an effort to build a new 3.5 billion dollar bomb plant at Y-12. This seems to be totally out of step with the need to reduce nuclear weapons in the world. Our nuclear stockpile needs to be safely and securely reduced.

2|9.A We want a world free of nuclear weapons. We want our country to be the world leader in developing a future free of nuclear weapons. We request that we do not build more nuclear weapons, but rather devote our nation's resources to downsizing the weaponry. OREPA has proposed an alternative which could save the nation billions and still provide for our safety while maintaining our national defense. Please give careful consideration to the OREPA's alternative.

With Christian Love and Concern,

Lawrence E Barker

Ada Chapel Friends Meeting
Lawrence Barker, Clerk

Barkman, William

Page 1 of 1

WD036

[redacted]

From: Barkman, William Edward (WYB) [barkmanwe@y12.doe.gov]
Sent: Thursday, November 19, 2009 1:54 PM
To: DIV.Y12SWEIS.Comments
Subject: FW: EIS comments

Address typo

From: Barkman, William Edward (WYB) [mailto:barkmanwe@y12.doe.gov]
Sent: Wednesday, November 18, 2009 1:46 PM
To: 'y12sweis.comments@tetratecg.com'
Subject: EIS comments

1|13.0 I have worked in the Nuclear Weapons Complex, now the Nuclear Security Enterprise (NSE), for over 37 years and an very familiar with the activities at the Y-12 National Security Complex (Y-12) and the other NSE sites. Y-12 is by far the best location for continuing the weapons manufacturing activities described in the EIS (as evidenced by NNSA's decision to keep the work at Y-12 and the historical example of the astronomical expenses associated with moving the Pu work from Rocky Flats to LANL) and the preferred alternative provides the most flexibility, in a cost-effective package, for dealing with existing requirements as well as responding to future political uncertainties in the global arena.

1

Bassett, David

Page 1 of 1

WD073

[redacted]

From: David Bassett [dbassett14@knology.net]
Sent: Sunday, January 24, 2010 5:00 PM
To: DIV.Y12SWEIS.Comments
Subject: Draft Y-12 SWEIS

Thank you for holding the public hearings held in Oak Ridge, Tennessee on the Draft Y12 Site Wide Environmental Impact Statement (SWEIS). I understand that the Department of Energy's preferred alternative involves a Uranium Processing Facility (UPF) that will manufacture thermonuclear secondaries. This facility would update, and perhaps add to, our stockpile of nuclear warheads, so that they can remain viable for a century or more.

At the public hearings, most of the comments voiced support for the federal government's investment in a UPF. Many comments stressed the enhancement of Oak Ridge's economic vitality. Other comments mentioned plant safety, modernization, production efficiency, and the national security provided by having nuclear weapons as a deterrent to war.
Clearly, a $3 billion national investment in the Oak Ridge Y12 facility is desired by the Y12 work force, and many civic and community organizations in Oak Ridge.

1|1.C In my opinion, the Unites States government should be seeking ways to lead the world in nuclear disarmament. As more and more countries around the world gain the nuclear weapons capabilities, the argument that having such weapons contributes to a stable political climate seems tenuous, and the likelihood of worldwide annihilation by nuclear destruction seems more likely. Thus, Alternative 6, proposed by the Oak Ridge Environmental Peace Alliance, seems to be the most reasonable option. This calls for current production facilities to be consolidated and downsized as needed to meet safety, environmental, and health concerns. Dismantlement and disposing of retired nuclear weapons would become important activities of the
2|9.A facility. In addition, the Oak Ridge facility would create technologies that could allow an international body to verify other nations' claims regarding nuclear weapons capabilities.

In summary, the Y12 SWEIS should consider options that reflect the U.S.
government's efforts to reduce its nuclear arsenal. Oak Ridge, as a city that is a leader in nuclear weapon technologies, is well positioned to play an important role in this area.

Sincerely,

David R. Bassett, Jr.
7632 Sabre Dr.
Knoxville, TN 37919
USA

e-mail: dbassett14@knology.net

1

Beck, Stephen

Page 1 of 1

WD060

[redacted]

From: STEPHEN BECK [smbeck@beck-consulting.com]
Sent: Thursday, December 31, 2009 11:21 AM
To: DIV.Y12SWEIS.Comments
Subject: UPF Project Support

firstName=Steve
lastName=Beck
organization=Beck Consulting
email=smbeck@beck-consulting.com
address1=6731 TIMBER RUN LANE
address2=
city=KNOXVILLE
state=TN
zip=37918
country=United States
subject=Draft Y-12 SWEIS
1|13.0 comments=I would like to submit my support for UPF. I know first hand that it is needed very much for the plant, Oak Rdige and residents of surrounding areas. You have my support for the project as planned to replace existing facilities.

Steve Beck
BECK CONSULTING
Mobile 865.403.9277
smbeck@beck-consulting.com
www.beck-consulting.com

1

Bedford, Crayton

Page 1 of 1

WD110

[redacted]

From: Crayton Bedford [cbedford@charter.net]
Sent: Friday, January 29, 2010 5:01 PM
To: DIV.Y12SWEIS.Comments
Subject: Comments on Oak Ridge

To whom it may concern:

1|9.A I just learned that today is the last day to express an opinion about the plans for a nuclear facility in Oak Ridge, TN. I understand that the OREPA alternative 6 would prevent nuclear warheads from being made there, and that is the alternative I would like to see approved.

2|3.A I live in Asheville, NC, not far from the facility onder consideration. I do not want nuclear bombs made in my backyard. Furthermore, it is hard to understand the military need for such armaments. By 2018, when it would be completed, I cannot conceive that we will still be trying to threaten the rest of the world with our nuclear arsenal. Surely we will have moved beyond that. Furthermore, it is not clear to me that the number of nuclear warheads permitted under the START treaty would even permit the production contemplated at Oak Ridge.

1|9.A (cont) Please support the OREPA Alternative 6.

Crayton Bedford
828-299-3225
26 N. Perhsing Rd
Asheville, NC 28805

1

Beehan, Tom

Page 1 of 3

MD022

CITY OF
OAK RIDGE

OFFICE OF THE MAYOR

POST OFFICE BOX 1 • OAK RIDGE, TENNESSEE 37831-0001

November 23, 2009

Ms. Pam Gordon
Y-12 SWEIS Document Manager
Y-12 Site Office
800 Oak Ridge Turnpike
Suite A-500
Oak Ridge, TN 37830

Draft Site-Wide Environmental Impact Statement (SWEIS)
for the Y-12 National Security Complex (DOE/EIS-0387, October 2009)

Dear Ms. Gordon:

Enclosed is a certified copy of Resolution No. 11-108-09 as unanimously adopted by the Oak Ridge City Council in regular session on November 16, 2009.

1|13.0 As you will note, this resolution places the Council on record as endorsing the preferred alternative identified as *Alternative 4: Capability-sized UPF*, in which NNSA would construct a new 350,000 square feet Uranium Processing Facility (UPF) that would allow Y-12 to maintain all capabilities for producing secondaries and cases, and capabilities for planned dismantlement, surveillance and uranium work for other NNSA and non-NNSA customers; and the construction of the Complex Command Center (CCC), that would serve as a new emergency services complex for Y-12, house equipment and personnel for the plant shift superintendent, Fire Department, and Emergency Operations Center.

Please ensure that this resolution is entered into the record as the official comments of the City of Oak Ridge.

Sincerely,

Thomas L. Beehan
Mayor

jb

Enclosure

Beehan, Tom

Page 2 of 3

NUMBER 11-108-09

RESOLUTION

WHEREAS, the National Nuclear Security Administration (NNSA), a semi-autonomous agency within the DOE was established by Congress in 2000 to manage the nation's nuclear weapons complex; and

WHEREAS, the NNSA is the federal agency responsible for maintaining and enhancing the safety, security, reliability, and performance of the U.S. nuclear weapons stockpile; and

WHEREAS, the NNSA operates the Y-12 National Security Complex (Y-12) located in Oak Ridge, Tennessee; and

WHEREAS, Y-12 has a significant economic impact on the region, with over 4,500 employees and subcontractors, procurements worth millions of dollars annually; as well as other spin-off activities; and

WHEREAS, the City of Oak Ridge strongly supports the continued operation of Y-12 and its national security mission as a center of excellence for uranium and other special nuclear materials, including the safe and secure storage and processing of uranium; and

WHEREAS, Y-12's highly trained and talented workforce cannot be easily replicated anywhere in the world; and

WHEREAS, the City of Oak Ridge commends the NNSA for its ongoing efforts to improve operating efficiencies, enhance safety and security, and accelerate nuclear weapons dismantlement activities; and

WHEREAS, investments in the modernization of the nuclear weapons complex , including Y-12, will help ensure that vital national security missions are performed in a safe and efficient manner; and

WHEREAS, in accordance with the National Environmental Policy Act (NEPA) of 1969, the NNSA has issued the *Draft* ***Site-Wide Environmental Impact Statement (SWEIS) for the Y-12 National Security Complex (DOE/EIS-0387, October 2009)*****; and**

WHEREAS, the purpose of the SWEIS is to analyze the potential environmental impacts of alternatives for ongoing and foreseeable future operations, facilities and activities at Y-12, including those related to construction and operation of the Uranium Processing Facility (UPF); and

WHEREAS, the NNSA is soliciting comments on the scope of the SWEIS in accordance with the Council on Environmental Quality (CEQ) regulations implementing NEPA and DOE NEPA Implementing Procedures; and

WHEREAS, the City of Oak Ridge desires to officially comment to NNSA on the SWEIS; and

WHEREAS, the NNSA's preferred alternative as described in the SWEIS is identified as *Alternative 4: Capability-sized UPF*, in which NNSA would construct a new 350,000 square feet Uranium Processing Facility (UPF), which would allow Y-12 to maintain all capabilities for producing secondaries and cases, and capabilities for planned dismantlement, surveillance and uranium work for other NNSA and non-NNSA customers; and

WHEREAS, included in this alternative is the construction of the Complex Command Center (CCC), which would serve as a new emergency services complex for Y-12, house equipment and personnel for the plant shift superintendent, Fire Department, and Emergency Operations Center; and

WHEREAS, the location of the UPF and CCC at Y-12 is highly desirable and logical; and

WHEREAS, the City Manager recommends the transmittal of a resolution endorsing the NNSA's preferred alternative identified as *Alternative 4: Capability-sized UPF*, in which NNSA would construct a new 350,000 square feet Uranium Processing Facility (UPF) that would allow Y-12 to maintain all capabilities for

Beehan, Tom

Page 3 of 3

producing secondaries and cases, and capabilities for planned dismantlement, surveillance and uranium work for other NNSA and non-NNSA customers; and the construction of the Complex Command Center (CCC), that would serve as a new emergency services complex for Y-12, house equipment and personnel for the plant shift superintendent, Fire Department, and Emergency Operations Center.

NOW, THEREFORE, BE IT RESOLVED BY THE COUNCIL OF THE CITY OF OAK RIDGE, TENNESSEE:

1|13.0 (cont)

That the recommendation of the City Manager is approved and the City of Oak Ridge endorses the preferred alternative identified as *Alternative 4: Capability-sized UPF*, in which NNSA would construct a new 350,000 square feet Uranium Processing Facility (UPF), that would allow Y-12 to maintain all capabilities for producing secondaries and cases, and capabilities for planned dismantlement, surveillance and uranium work for other NNSA and non-NNSA customers; and the construction of the Complex Command Center (CCC), that would serve as a new emergency services complex for Y-12, house equipment and personnel for the plant shift superintendent, Fire Department, and Emergency Operations Center.

BE IT FURTHER RESOLVED that this resolution be transmitted to NNSA as the official comments of the City of Oak Ridge.

This the 16th day of November 2009.

APPROVED AS TO FORM AND LEGALITY:

City Attorney Mayor

City Clerk

I, Jacquelyn J. Bernard, City Clerk of the City of Oak Ridge, Tennessee, certify this document to be a true and exact copy of Resolution No. 11-108-09 as adopted by the Oak Ridge City Council on November 16, 2009.

Given under my hand and official seal of the City of Oak Ridge, Tennessee, this the 24th day of November, 2009.

City Clerk

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Belbeck, Mike

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MD016

Draft Y-12 Site-wide
Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

NNSA
National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010

1|13.0 I want to express my full support for the continued development of the Uranium Processing Facility at Y-12. This will mean more jobs for our community and continued economic growth for our region. In addition, it will position Oak Ridge and Y-12 as the leader in technology that we need to be. Thank you for your consideration.

2|12.H

Sincerely,

Mike Belbeck
135 Rocklobster Grass Blvd
Oak Ridge, TN 37830

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@emanets.com

You may also submit comments through the project website which can be found at:
http://www.Y12sweis.com

1

Bell, Rebekah

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WD062

[redacted]

From: Rebekah Bell [rebekahbell@comcast.net]
Sent: Sunday, January 03, 2010 7:56 PM
To: DIV.Y12SWEIS.Comments
Subject: Y-12 Site Wide EIS Comment

firstName=Rebekah
lastName=Bell
organization=
email=rebekahbell@comcast.net
address1=11310
address2=
city=Knoxville
state=TN
zip=37931
country=United States
subject=Draft Y-12 SWEIS
1|13.0 comments=I support the preferred alternative for the Y-12 Site Wide Environmental Impact Statement.

Thanks!

1

Bennet, Mark-Ellis

Page 1 of 1

WD097

[redacted]

From: Mark Bennet [pv58firefly@gmail.com]
Sent: Friday, January 29, 2010 9:46 AM
To: DIV.Y12SWEIS.Comments
Subject: OREPA Alternative 6

1|9.A | I prefer OREPA Alternative 6.
Mark-Ellis Bennett
Asheville, NC

1

Bergmann, Fred

Page 1 of 1

WD024

[redacted]

From: Fred W Bergmann [fwb@innoveering.com]
Sent: Wednesday, November 18, 2009 12:38 AM
To: DIV.Y12SWEIS.Comments
Subject: Comment: Nuclear anything is an environmental catastrophy

firstName=Fred
lastName=Bergmann
organization=
email=innoveer3@netscape.net
address1=W5679 State Road 60
address2=
city=Poynette
state=WI
zip=53955
country=USA
subject=Draft Y-12 SWEIS
comments=The purpose of the facility being considered for this Environmental Impact Statement is to concentrate hugely dangerous and long lived materials for disbursement upon other premises sometime in the future. This delivery is uncertain and unpredictable, and if fortune is with us, belligerency will not cause this disbursement and perhaps we will be able to reduce their concentration and spend vast amounts of money to prevent their seeping into the surroundings of their present site sometime in the next thousands of years.
1|14.0 It is very simple. Belligerent use of the products of the Oak Ridge site will have intolerable environmental consequences.
If the products are never deployed on purpose, their ability to cause massive harm far outlives the human race. The efforts of all human institutions to safely use and quarantine these materials from the environment have all been miserable failures in the several decades that we have been able make such concentrations. Continuing on such a course is foolhardy.
draftcd=Draft CD-Rom Only
finalcd=Final CD-Rom Only
rod=Record of decision

1

Bevan, Hesperia

Page 1 of 1

MD032

738 Lebanon Road
Clarksville, Ohio 45113
December 11, 2009

Pam Gorman
880 Oak Ridge Turnpike
Oak Ridge, Tennessee 37830

Dear Ms. Gorman:

I am concerned that a new 3.5 billion dollar nuclear bomb facility is being planned for the Oak Ridge area.

It seems that money directed at creating something to destroy lives should be directed toward creating that which saves and improves lives. 1|14.0

Certainly in today's world we don't need more weapons of mass destruction; we need means to secure peace among nations and jobs that will preserve the world in which we live.

Sincerely,
Hesperia Bevan

Billmeier, Gerard

Page 1 of 1

WD041

[redacted]

From: Billmeier [billmeier@comcast.net]
Sent: Monday, November 23, 2009 8:42 AM
To: DIV.Y12SWEIS.Comments
Subject: Form posted from Windows Internet Explorer.

firstName=Gerard J.
lastName=Billmeier, Jr. MD
organization=OREPA/American Academy of Pedi email=billmeier@comcast.net
address1=6465 Massey Lane
address2=
city=Memphis
state=TN
zip=38120
country=USA
subject=Draft Y-12 SWEIS
1|2.F comments=The Y12SWEIS proposal fails to consider all reasonable alternatives as required by law. Massive
2|9.A expenditures in the billions of dollars for a new facility cannot be justified. The OREPA Alternative should be considered as a cost savings means of maintaining security and safe workplace conditions for the next 50-60 years. We urge that this alternative be strongly considered in the interest of our nation's security and the deterrence of a nuclear arms escalation.
drafts=Draft SWEIS Summary
rod=Record of decision

1

Birchenough, Katie

Page 1 of 1

WD077

[redacted]

From: Katie Birchenough [ksbirch@charter.net]
Sent: Wednesday, January 27, 2010 9:21 AM
To: DIV.Y12SWEIS.Comments
Subject: Oak Ridge facility

Hello,

1|9.A
2|1.A.1
As a resident of Asheville, NC, I prefer the OREPA 6 alternative to the nuclear energy debate in Oak Ridge, Tenn. We need to make sense with our choices for energy, and as I understand it, the facility would be outdated by the time it was finished and we would have more warheads than we could legally use. The OPREPA option 6 offers a reasonable alternative. Please choose wisely.

Thank you,
Katie Birchenough

1

Bodley, William

Page 1 of 1

MD030

William & Roberta Bodley
53262 Butternut
Chesterfield Twp., MI 48051

29 Dec. 2009

Ms. Pam Gorman
Y12 SWEIS Document Mgr.
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Dear Ms Gorman,

1|3.A
Please accept this note, my recommendation that plans to build a [redacted] new bomb plant be abandoned. There is no military or security need for this. It flies in the face of President Obama's call for real progress for a nuclear free world

2|9.C

1|3.A (cont)
Please excuse this paper - but I have low vision and this sort of paper makes writing easier. But I am a father and grandfather and feel deeply that the future of our common humanity requires a nuclear free world, not one building new nuclear weapons facilities.

Sincerely yours,
William J Bodley

Bolin, A.

Page 1 of 1

MD035

Draft Y-12 Site-wide
Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

NNSA
National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010.

1|5.0 I fully support Alternative #2 - Uranium Processing Facility Alternative. I do not believe that with Countries like Iran, and Venezuela and many others, elimination of Nuclear Weapons is in the best interest of our country. Even as Russia talks of their elimination they are testing new missiles to carry them.

2|3.B No matter what the through put becomes on the new facility all the equipment and processes are still needed, so a reduction in size is not ~~feasible~~ feasible, in fact it is creating many design problems trying to fit the needed processes into the small footprint we are currently given. The design time could have been reduced considerable with a larger building to work with, from the beginning. The facility will be needed not only for assembly but disassembly of the old weapons.

1|5.0 (cont) I believe the new facility is badly needed to maintain the safety of the enviroment and the workers. Of course the hope and dream is for elimination of all nuclear weapons, but that is only a dream which could lead to the distruction of our country by those who hate us so deeply.

Ann Bolin

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:
http://www.Y12sweis.com

Bone, Gerald

Page 1 of 2

WD016

[redacted]

From: Jerry Bone [jerrybone@tvuuc.org]
Sent: Tuesday, November 17, 2009 4:14 PM
To: DIV.Y12SWEIS.Comments
Subject: Form posted from Windows Internet Explorer.

firstName=Gerald
lastName=Bone
organization=Veterans for Peace, OREPA
email=geraldbone@bellsouth.net
address1=321 E. Emerald Ave.
address2=
city=Knoxville
state=TN
zip=37917
country=USA
subject=Draft Y-12 SWEIS
comments=Comments concerning Y12 SWEIS:

From: Gerald W. Bone
321 E. Emerald Ave.
Knoxville, TN 37917

Date: November 17, 2009

My name is Jerry Bone. Iâ€™m a resident of Knoxville, 70 years of age. I am a great-grandfather and a proud member of both the Oak Ridge Environmental Peace Alliance and Veterans for Peace. I have been

1|14.0 opposed to the development, deployment and proliferation of nuclear weapons for as long as I can remember.

We live in a world of great peril, on many fronts. The future of our children and of all the children in the world is threatened by climate change, hunger and grinding poverty, violently promoted political ideologies wrapped in the garb of religion, water shortages, poisoned food sources, pandemics yet to be

1|14.0 (cont) dreamed of. The list is much longer than that. Yet at this dismal, perilous time in world history, we people of the world have begun to take extraordinarily hope-inspiring steps toward stopping the proliferation of nuclear weapons.

This is what this hearing is about. Will we continue these steps or will we the people be thwarted once again by the misguided and selfish minority that holds sway in the halls of power?

I was reading a recent issue of The Nation a few days ago. It featured an interview with former Soviet President Mikhail Gorbachev. In this interview, Gorbachev talked about then-president Ronald Reagan and how he thought of Reagan as a â€œreal dinosaur.â€ Reagan, in turn, referred to Gorbachev as â€œa diehard Bolshevik.â€ Yet, these two menâ€”as ideologically opposed as any two leaders in history--were in agreement when they wrote to the people of the world in 1985: â€œNuclear war is inadmissible, and in it there can be no victors.â€ Still later, at Reykjavik, they agreed that nuclear weapons should be abolished.

2|9.A I urge the adoption of Alternative 6 of this proposal, which reflects the current policy of the United States under President Obama. The ground that was broken at Rekjavik in 1986 must not be cemented over by the

3|1.E outdated, often hysterical, rhetoric of the cold war. In order for non-proliferation to work, there must be dismantling of nuclear weapons and a plan to reduce these horrific weapons to zero in a reasonable period of

1

Bone, Gerald

Page 2 of 2

WD016

3|1.E (cont) time. Most nuclear nations will expect it and the non-nuclear nations will demand it. Whatâ€™s wrong with all the worldâ€™s children deserve to live in a world where these most horrific weapons of mass destruction can no longer threaten their lives.

I thank you for the opportunity to express my concerns on this matter.

Sincerely,

Gerald W. Bone

2

Boosinger, Laura

Page 1 of 1

WD116

[redacted]

From: Laura Boosinger [laurabоosinger@gmail.com]
Sent: Friday, January 29, 2010 10:28 PM
To: DIV.Y12SWEIS.Comments

1|14.0 PLEASE do not make nuclear BOMBS in my backyard in Oak Ridge, TN.. Why do we need more bombs in the world anyway????? stop this nonsense.
Laura Boosinger

1

Bowen, Mary Ellen

Page 1 of 1

MD028 1|9.A Yes I think Alternative 6 Below is the Best option

safety and security into a "modernization program" that would spend tens of billions of dollars on new bomb plants.

The stakes could not be higher. New bomb plants send precisely the wrong message to Iran and the rest of the world.

OREPA'S ALTERNATIVE

OREPA believes the Y12 SWEIS fails to consider all reasonable alternatives, as the law requires. Over the next 25 years, the mission of Y12 will undergo a fundamental change as the US reduces is nuclear stockpile. The need for production capacity will decline rapidly; facilities for routine surveillance and maintenance of the declining stockpile are all that will be needed and, eventually, even they will be phased out. Massive capital expenditures for a new, long-lived production facility can not be justified.

At the same time, the demand for dismantlement and disposition capacity will be growing, and current facilities will be insufficient to meet the demand.

So we propose Alternative 6, reflecting a forward-looking vision.

Current production facilities should be consolidated and down-sized in an existing facility, upgraded as necessary to meet environmental, safety and health standards. Envisioning US participation in an international verification regime during disarmament, safeguard and transparency protocols should be incorporated into the upgrades as they are designed. Throughput capacity of ten warheads a year or less will be adequate to assure the safety and security of the current stockpile as it awaits retirement.

At the same time, a new state-of-the-art single-purpose facility dedicated to dismantlement and staging for disposition of retired nuclear weapons secondaries/cases should be constructed. The location of this facility should be determined by a balancing of mission, security efficiency and environmental, safety, and health requirements.

Under OREPA's Alternative, not currently included in the Y12SWEIS, the high security footprint could be reduced by as much as 60%. The new, dedicated dismantlement facility could be designed and built at considerable savings over the proposed UPF, and would provide the most efficient and effective technologies for this critical mission as well as safe working conditions for its workforce over its 50-60 year life span.

OREPA believes the currently operating production facilities can be upgraded to standards protective of worker and public health and safety as well as protective of nuclear materials themselves for $100 million—a dramatic savings over the estimated $3.5 billion (with a B) cost of the UPF.

Ways to comment

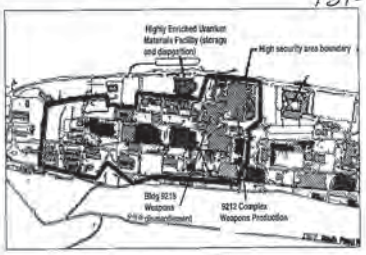
Two public hearings are being held at the New Hope Center in Oak Ridge. Tuesday evening, November 17, from 6:30 - 9:00pm and Wednesday, November 18, from 10:00am - 12:30pm.

Comments can also be submitted in writing to:
Pam Gorman
Y-12 SWEIS Document Manager
Y-12 Site Office
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830
(865) 483-2014 fax

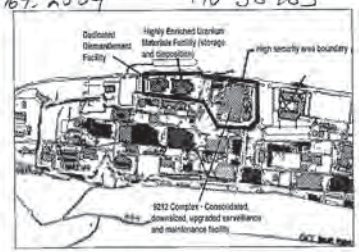
You can also download the Y12 Site Wide Environmental Impact Statement (Summary, or the full document) and make comments through the web site: www.Y12SWEIS.com. **Comment deadline: January 6, 2009.**

For OREPA's talking points and a detailed analysis of the SWEIS:
www.stopthebombs.org
or email orep@earthlink.net
865 776 5050

Mary Ellen Bowen, 152 8th Rd Summertown, TN 38483
931-964-2534



Y12 Today



Alternative 6 : New Dismantlement facility

OREPA News • 3 • November 2009

Yes!

Bradshaw, David

Page 1 of 1

WD074

[redacted]

From: David Bradshaw [drb1@comcast.net]
Sent: Sunday, January 24, 2010 11:55 PM
To: DIV.Y12SWEIS.Comments
Subject: Form Post from Firefox

firstName=David
lastName=Bradshaw
organization=
email=drb1@comcast.net
address1=116 Pratt Lane
address2=
city=Oak Ridge
state=TN
zip=37830
country=USA
subject=Draft Y-12 SWEIS

1|13.0 comments=My opinion: Construct and operate a new UPF to replace existing enriched uranium processing facilities. In addition, construct a new Complex Command Center to house Y-12's site and emergency management operations.

1

Bramlage, Nancy

Page 1 of 1

WD059

[redacted]

From: S. Bramlage, Nancy [nancy.bramlage@srcharitycinti.org]
Sent: Wednesday, December 30, 2009 3:42 PM
To: DIV.Y12SWEIS.Comments
Subject: Form posted from Windows Internet Explorer.

firstName=Nancy
lastName=Bramlage
organization=Sisters of Charity of Cincinna email=nancy.bramalge@srcharitycinti.
address1=5900 Delhi Rd.
address2=
city=Mt. St. Joseph
state=OH
zip=45051
country=
subject=Draft Y-12 SWEIS
comments=To whom it may concern:

1|9.C I am strongly opposed to the NNSA building a new bomb plant at Y12 in Oak Ridge, TN.
This plant will only accelerate the global pursuit for more nuclear weapons, which is counter to President Obama's commitment to work for a nuclear free world.

2|1.C We need instead to dismantle the 15 year backlog of retired weapons in Oak Ridge waiting to be dismantled.
This new plant will not help create national security, but will lead instead to a more dangerous society, with more and more coutries following our example of creating more nuclear weapons - with a greater and greater danger that one of these countries will use the weapons.
Building the plant would lead us in the wrong direction.

1

Bredesen, Phil

Page 1 of 1

MD069

PHIL BREDESEN
THE GOVERNOR OF TENNESSEE

27 January 2010

The Honorable Thomas P. D'Agostino
Administrator
National Nuclear Security Administration
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, DC 20585-0701

Dear Administrator D'Agostino:

1|7.0 On behalf of the residents of Tennessee, I want to thank you and the National Nuclear Security Administration (NNSA) for your Record of Decision last year to maintain our nation's critical uranium mission at the Y-12 National Nuclear Security Complex in Oak Ridge and to construct the Uranium Processing Facility (UPF) at Y-12. As you proceed by drafting the necessary Site-Wide Environmental Impact Statement (SWEIS), I urge you to move as quickly as possible toward constructing a capability-sized UPF at Y-12 NSC.

2|13.0 As you know, Y-12 has played an integral role in protecting our national security since the days of the Manhattan Project. While Y-12's processing facilities are safe and operational today, aging threatens to impact future operations. The need for UPF is best summarized by the findings of a 2009 bipartisan congressional report entitled, "***Final Report of Congressional Commission on the Strategic Posture of the United States.***" The Committee found that "existing facilities are genuinely decrepit and are maintained in a safe and secure manner only at a high cost."

As our nation's Uranium Center of Excellence, the center of our nation's nuclear security mission, Y-12 deserves better. Thank you for acting to modernize the facilities at Y-12 and strengthen our national security through the construction of a capability-sized UPF.

Warmest regards,

Phil Bredesen

cc: NNSA Y-12 Site Office Manager Theodore Sherry
Y-12 SWEIS Document Manager Pam Gorman

Brown, Betty

Page 1 of 1

East Bay Peace Action for a sane world

MD061

P.O. Box 6574
Albany, CA 94706
Phone (510) 233-0915

January 22, 2010

Pam Gorman,
Y 12 SWEIS Document Manager
Y 12 Site Office
800 Oak Ridge Turnpike, Ste. 500
Oak Ridge, TN 37830

To whom it may concern:

This is to submit comments relevant to the Draft Site Wide Environmental Impact Statement (SWEIS) for the Y 12 plant at Oak Ridge Tennessee.

We support those who call for broadening the scope to:

1|1.E.1 * consider the closing of the site;
* include an analysis of the impact of the SWEIS on the prospects for the United States to move the world towards reduction and elimination of nuclear weapons (The Nuclear Non Proliferation Treaty makes any testing of, or improvements to nuclear weapons a violation of international law and hence, the laws of the United States. The World Court has also declared nuclear weapons illegal.);
* prohibit any new sub-critical tests under the guise of the Stockpile Stewardship program;
2|12.O * include tracking of off-site contaminants and monitoring of upstream wells;
3|12.H * consider the lives of workers in terms of re-employment instead of maintaining nuclear weapons as a jobs program.

Sincerely,

Mrs. Betty Brown

Mrs. Betty Brown for the
EBPA Executive Board

Brown, Mira

Page 1 of 1

WD056

[redacted]

From: Mira Brown [mira@main.nc.us]
Sent: Wednesday, January 27, 2010 9:16 AM
To: DIV.Y12SWEIS.Comments
Subject: comment on new Oak Ridge construction of bomb making facility

1|9.A To Whom it May Concern, I live just an hour or so from Oak Ridge. My daughter came to speak at the hearing held there not long ago. I wish to affirm that our entire family is NOT in favor of the building of a new bomb making facility in Oak Ridge. I do not understand how it could possibly make sense, since by the time it is completed it could not be utilized for its constructed purpose without negating the treaties we have made in regard to nuclear weapons. We wish to support OREPA Alternative 6. My understanding of this situation is that if a majority of us support this alternative, it will be implemented. Is this accurate? Thank you,
Karen Watkins 201 Sang Branch Rd, Burnsville, NC 28714 828-682-9263.

--
Miss Brown
mira@main.nc.us
(828)-682-9263

1

Brown, Rick

Page 1 of 1

WD079

[redacted]

From: Rick Brown [rick.brown@earthlink.net]
Sent: Monday, January 25, 2010 9:04 PM
To: DIV.Y12SWEIS.Comments
Subject: Form posted from Windows Internet Explorer.

firstName=Rick
lastName=Brown
organization=
email=rick.brown@earthlink.net
address1=1084 Lindsey Drive
address2=
city=Sevierville
state=TN
zip=37876
country=USA
subject=Draft Y-12 SWEIS

1|12.O comments=My first comment is that the "site-wide EIS was not that; there was no information about the legacy and possible continuing environmental impacts resulting from nuclear weapons production at the Y-12 Plant. i am aware that much has been done to correct the historical problems, but groundwater
2|12.D contamination still exists. What is the current status of environmental remediation efforts?

3|10.B My second, and main comment concerns what is the gist of the "site-wide EIS" - the intention to construct a new production facility. To me this is wrong for many reasons; it is a huge expenditure in a time of recession and large deficits when the country has so many needs, and this, at most, will only create a few jobs, most of them short term; this is the only possible benefit and this could be done in many ways that would be better in all respects. President Obama has committed to working for a world free of nuclear weapons. This is the kind of world I want my children to be able to raise their families in. The minimal proposal, Alternative 5, would
4|1.E have a new production facility constructed that could produce 10 secondaries per year. This is unneeded since it is projected that Y-12 will have upgraded weapons to the limit allowed under the Comprehensive Test Ban Treaty by 2020; also, the fact that America is building a new nuclear weapon production facility would not be lost on other countries such as Iran, which some think may be taking steps toward building nuclear weapons and which the USA has condemned even without conclusive evidence.

5|9.A I support the Oak Ridge Environmental Peace Alliance's "Alternative 6". This alternative would use stimulus money, create jobs, and keep workers employed at Y-12 for a long time doing work that most people would agree is useful and necessary; this is dismantling the nuclear stockpile at a faster pace (which would still take many years) and preparing the materials for downblending and safe storage in a facility that is specifically designed for this purpose. While I would rather not have nuclear weapons work in my back yard, I recognize that the plant is here, the work force is here, and this is a task we can all support and which will keep this generation of workers in their jobs contributing to their families and the local economy. I hope you will more fully explore Alternative 6 and seriously consider this option.
rod=Record of decision

1

Brown, Rick

Page 1 of 1

WD026

[redacted]

From: Rick Brown [rick.brown@earthlink.net]
Sent: Tuesday, January 26, 2010 9:00 PM
To: DIV.Y12SWEIS.Comments
Subject: Form posted from Windows Internet Explorer.

firstName=Rick
lastName=Brown
organization=
email=rick.brown@earthlink.net
address1=1084 Lindsey Drive
address2=
city=Sevierville
state=TN
zip=37876
country=United States
subject=Draft Y-12 SWEIS

1|12.O comments=My first comment is that this was supposed to be a site-wide EIS. As such the EIS should have discussed the current state of environmental remediation of legacy problems at the site and the current state of environmental compliance (all media) for the whole site. The EIS did not do this.

2|10.B My main comment is concerned with what the site-wide EIS did focus on completely; that is, the intention to construct a new nuclar weapons facility. I believe this is wrong for many reasons. With the country in a serious recession and running huge deficits we shouldn't be constructing something that is not needed. I can understand spending money to create jobs but there are many better ways to do this. The minimum proposed alternative, alternative 5, calls for a new facility that can construct 10 secondaries per year. It has been projected that with the current capabilities the Y-12 Plant will have refurbished the maximum number of warheads allowed under the Non-Proliferation Treaty by 2020 when the new facility would come on line, so at
3|1.E that time the new facility would be completely unneeded and would put the US in violation. Moreover, construction of a new weapons production facility cannot help but be noticed by other countries such as Iran, which is being told that they can't even enrich uranium to a far below bomb-grade concentration. President Obama has expressed an intent to work toward a world free of nuclear weapons. That is the kind of world I want for my children and grandchildren-to-be.

4|9.A I do support "Alternative 6" as proposed by the Oak Ridge Environmental Peace Alliance. This alternative would designate any new construction for the specific purpose of dismantling nuclear weapons and preparing the materials for downblending and safe storage. This alternative has the advantage of using stimulus money to create jobs for construction and keeps a significant work force employed in Oak ridge for many years; even at an increased place of dismantling there is projected to be enough work to allow the existing work force at Y-12 to finish their careers dismantling weapons. Jobs and money will stay in the community under this alternative, and the work they will be doing will be something we can be proud of.
rod=Record of decision

1

Brown, Sandra

Page 1 of 1

WD040

[redacted]

From: Brown, Sandra G (SGZ) [brownsg@y12.doe.gov]
Sent: Monday, November 23, 2009 7:49 AM
To: DIV.Y12SWEIS.Comments
Subject: UPF and Complex Command Center

1|13.0 I support the UPF project. It is needed in order to sustain the viability of the Y-12 Plant.

I support the Complex Command Center. It is needed for centralization of several functions.

1

Brummett, Matt

Page 1 of 1

MD046

Draft Y-12 Site-wide
Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010.

1|5.0 I strongly voice support for Alternative #2
Y-12 needs the capability to run existing operations as well as being able to support future D&D + work for other missions

2|3.B Not replacing old, aging, + sometimes dangerous facilities is not only irresponsible to the taxpayers but unsafe + unfair to future workers

3|7.0 The one problem w/ capability size UPF Alt is that there is NO room to grow + perform multiple missions. WFO work already has + will

Sincerely,
Matt Brummett

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:
http://www.Y12sweis.com

Bryan, Mary

Page 1 of 2

WD039

[redacted]

From: Mary Bryan [countinggirl@frontiernet.net]
Sent: Saturday, November 21, 2009 2:14 PM
To: DIV.Y12SWEIS.Comments
Subject: Form posted from Windows Internet Explorer.

firstName=Mary
lastName=Bryan
organization=
email=countinggirl@frontiernet.net
address1=P. O. Box 261
address2=
city=Maynardville
state=TN
zip=37807
country=USE
subject=Draft Y-12 SWEIS
comments=I am writing to voice my opinion about the preferred alternative (building a Capability-Sized Uranium Processing Facility) as presented in the Y-12 Site Wide Environmental Impact Statement. It would appear that under this alternative a new bomb plant is being proposed for the Y-12 site. This bomb plant (the UPF) would manufacture secondaries to be used in a Life Extension Program of aging nuclear weapons. These weapons will be modified in some cases to become new weapons with new military capabilities. The capacity to produce newly designed nuclear warheads would be retained as well.

1|1.B This alternative flies in the face of President Obama's commitment to a world free of nuclear weapons as he expressed in Cairo: "I strongly reaffirm America's commitment to seek a world in which no nations hold nuclear weapons." By investing new money in new production facilities, we are sending a message to the rest of the world: it is alright for the United States to continue producing nuclear weapons at the same time that we are demanding that other nuclear weapon-seeking states not do so.

2|1.C This all comes at a time when the Nuclear Nonproliferation Treaty, which committed nuclear weapons states to "pursue in good faith negotiations leading to disarmament at an early date," comes under review in 2010. If the US decides to continue to produce new nuclear weapons under the guise of a Life Extension Program, it may well put the NPT in danger of collapse. It will also negate any gains we might hope to make in nonproliferation efforts through the START Treaty renewal and the Comprehensive Test Ban Treaty ratification.

3|9.A A sixth Alternative should be considered in the Y12 SWEIS in which current production facilities are consolidated and down-sized in an existing facility with upgrading necessary to meet environmental, safety and health standards. The US participation in an international verification regime during disarmament should also be envisioned and incorporated into the upgrades. At the same time, a new single-purpose facility dedicated to dismantlement and staging for disposition of retired nuclear weapons secondaries should be constructed. This new dedicated dismantlement facility could be designed and built at considerable savings over the proposed UPF.

I hope that the Department of Energy's National Nuclear Security Administration will deeply consider the ramifications of Alternative 5 presented in the Y12 SWEIS and embrace a different alternative, such as the one

1

Bryan, Mary

Page 2 of 2

3|9.A (cont) briefly described above, that will not provoke other states around the world such as Iran and North Korea during this critical time in the history of nuclear weapons.

WD039

rod=Record of decision

2

Burch, Lillian

Page 1 of 1

WD028

[redacted]

From: Lillian Burch [lburch@drctn.org]
Sent: Wednesday, November 18, 2009 10:34 AM
To: DIV.Y12SWEIS.Comments
Subject: Form posted from Windows Internet Explorer.

firstName=Lillian
lastName=Burch
organization=
email=lillianburch@rocketmail.com
address1=1549 Fox Hollow Trail
address2=
city=Knoxville
state=TN
zip=37923
country=USA
subject=Draft Y-12 SWEIS
1|14.0 |comments=We do not need any more nuclear bombs!!!

1

Byrd, James

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MD042

Draft Y-12 Site-wide
Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

NNSA
National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010.

1|13.0 I am in complete support of NNSA proceeding with the construction of the new UPF and Y-12 Complex Command Center. I believe Y-12 is essential to our national security and contributes significantly to our local community and economy. I believe Y-12 and the NNSA to be good stewards of the environment and are proactive in addressing any environmental issues. My hope and prayer is that we never again have to use nuclear weapons. I do believe that nuclear weapons play an important role as a deterrent and ensure our freedoms and the National security of our great nation.

James V. Byrd, Jr.
Louisville, TN.

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:
http://www.Y12sweis.com

Campbell, Henry

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WD027

[redacted]

From: Campbell, Henry nmn (C17) [campbellh@y12.doe.gov]
Sent: Wednesday, November 18, 2009 10:47 AM
To: DIV.Y12SWEIS.Comments
Subject: SWEIS

11/18/2009

Sirs;

My name is Henry Campbell. I live in Knoxville, Tennessee and work at Y-12. I have been employed as a Pipefitter for close to 28 years.

1|7.0 I am writing to lend my support in favor of 'Alternative 4' the Preferred Alternative for a capability sized UPF. I attended the meeting on the evening of Nov. 17 and came away with that decesion. It was not a hard decesion because I believe in our mission here at Y-12.

Thank You
Henry Campbell

1

Carawan, Carolanne

Page 1 of 1

WD033

[redacted]

From: Guyncandie@aol.com
Sent: Wednesday, November 18, 2009 3:17 PM
To: DIV.Y12SWEIS.Comments
Subject: No Subject

1|14.0 We are way past the time when we should be building new nuclear weapons. Rather we should be safely
2|12.J reducing the weapons we currently have. Locally, we are tired of the endless news stories of leaks and lax
1|14.0 (cont) security and dangerous conditions at the Oak Ridge bomb complex. We want clean-up and an end to weapons production.
Thank you,
Carolanne M. Carawan, New Market, TN

1

Carden, Fred

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WD078

[redacted]

From: Fred Carden [fredcarden@yahoo.com]
Sent: Monday, January 25, 2010 7:53 PM
To: DIV.Y12SWEIS.Comments
Subject: Written Comments to Y-12 SWEIS

1|3.B I am in favor of the capability sized UPF alternative. Continuing to use existing facilities does not protect worker safety, is more expensive and delays production upgrades needed now. This approach I believe is the lowest life-cycle cost to the NNSA/DOE. Nuclear weapons are here for a long time. The NNSA needs to bring their facilities up to date with new safety codes to protect both the public and the defense workers.

Fred Carden
203 Village Green Pkwy
Knoxville, TN 37934-3726
(865) 607-9467

1

Carroll, Bonnie

Page 1 of 1

MD029

IIa Information International Associates

November 25, 2009

Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Dear Ms. Gorman:

This letter is written in support of the proposed Uranium Processing Facility (UPF) at the Y-12 National Security Complex in Oak Ridge. We, at IIa, believe this facility will serve as an excellent anchor to the modernization initiative currently underway at Y-12. It promises to enhance the safety and health of the workforce, and it is the most effective plan to carry out the crucial national security missions performed at the Y-12 complex.

1|13.0 We support the statement made by ETEC and other local organizations at the first public support meeting, "Our region has always been strong in support of the uranium processing and nuclear related missions of the Oak Ridge complex. We are prepared to continue to fully support such missions and to continue to invest in regional workforce development that is required for these operations. We do believe that Y-12's continued role in manufacturing and disassembling nuclear warhead components should be conducted in modernized facilities with cost effective and safety focused processes. We think this preferred option of a new UPF achieves this objective."

As a woman-owned, small business with headquarters in Oak Ridge, we, at IIa, agree with that statement and pledge our support as a member of this community. We believe that Y-12's designation as the NNSA's Uranium Center of Excellence, along with the modernization activities being undertaken, are an excellent part of the plan for "Complex 2030".

Please do not hesitate to contact me should you need further information and I would be happy for you to include these statements in the official EIS.

Sincerely,

Bonnie C. Carroll

Bonnie C. Carroll
President

Cc: Ted Sherry
Congressman John Duncan
Congressman Lincoln Davis
Congressman Zach Wamp
Senator Bob Corker
Senator Lamar Alexander

(865) 481-0388• Fax (865) 481-0390
1055 Commerce Park Drive, Suite 110
PO Box 4219
Oak Ridge, TN 37831-4219
www.iiaweb.com

Christiansen, Jennifer

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WD034

[redacted]

From: Jennifer [jchristiansen@twcny.rr.com]
Sent: Wednesday, November 18, 2009 4:00 PM
To: DIV.Y12SWEIS.Comments
Subject: Form posted from Windows Internet Explorer.

firstName=Jennifer
lastName=Christiansen
organization=
email=jchristiansen@twcny.rr.com
address1=1717 Lake Shore Road
address2=
city=Chazy
state=NY
zip=12921
country=USA
subject=Draft Y-12 SWEIS
1|14.0 comments=Stop the madness of a nuclear project. Our planet is suffering enough! Our planet's existence is already in peril. This proposal will weaken our role in world peace. Please document that I oppose this plan absolutely.

1

Christoffer, Fred

Page 1 of 1

WD069

[redacted]

From: Fred [fredisnow@bellsouth.net]
Sent: Thursday, January 21, 2010 2:48 PM
To: DIV.Y12SWEIS.Comments
Subject: Form Post from Firefox

firstName=Fred
lastName=Christoffer
organization=
address1=3505 Hackworth Rd
address2=
city=knoxville
state=tn
zip=37931
country=
subject=Draft Y-12 SWEIS
1|5.0 comments=Please build the UPF, alt 2. I rather be safe then sorry or dead. Mindless socialist utopian idiots have no place in this world. I was prompted to comment by a moronic letter in the News-Sentinel 1/21/10.

I want to die peacefully in my sleep like my grandfather. Not screaming in terror like his passengers.

I'm never wrong. Once, I thought I was, but I was mistaken

1

Clark, Christopher

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WD049

[redacted]

From: Chris Clark [clclarkusa@gmail.com]
Sent: Monday, December 07, 2009 7:57 PM
To: DIV.Y12SWEIS.Comments
Subject: Form posted from Windows Internet Explorer.

firstName=Christopher
lastName=Clark
organization=
email=clclarkusa@gmail.com
address1=1813 Hart Road
address2=
city=Knoxville
state=TN
zip=37922
country=USA
subject=Draft Y-12 SWEIS
comments=I have reviewed the draft Y-12 SWEIS online and believe that the Alternative 4: Capability-sized UPF is the appropriate path to take.
1|7.0 Our nation needs a processing facility for uranium to support dismantlement, naval reactors and the stockpile. The current facility has gone well beyond it's original design life, and had worn out the band-aid upgrades to keep it operational. The preferred economic alternative for our nation is to accelerate construction of a new UPF sized for the anticipated needs of our country.

1

Clark, Donald

Page 1 of 6

WD007

[redacted]

From: Don Clark [clarkjd@frontiernet.net]
Sent: Monday, November 16, 2009 1:07 PM
To: DIV.Y12SWEIS.Comments
Subject: Resources to supplement the testimony of Donald B. Clarkas attachments. To be a part of the record
Attachments: tool_kit.pdf; ussigners.pdf; UCS_Complex2030_factsheet.pdf; mciCurriculum.pdf

firstName=Donald
lastName=Clark
organization=Network for Environmerntal and email=clarkjd@frontiernet.net address1=P.O.Box 220
address2= city=Pleasant Hill state=TN
zip=38578
country=USA
subject=Draft Y-12 SWEIS
comments=Submitting 4 multipage attachments seems impossible by this method. Please supply an EMAIL
1|15.0 ADDRESS Thank you

SUDDENLY ONE APPEARED Thank you
Donald B. Clark, on behalf of
Cumberland Countians for Peace & Justice and Network for Environmental & Economic Responsibility United Church of Christ P..O.Box 220, Pleasant Hill, TN 38578
(931) 277-5467 clarkjd@frontiernet.net

Also represent the Southern California Ecumenical Council , the Cornucopia Network of New Jersey ,Inc. The Caney Fork Headwaters Association.

1

Clark, Donald

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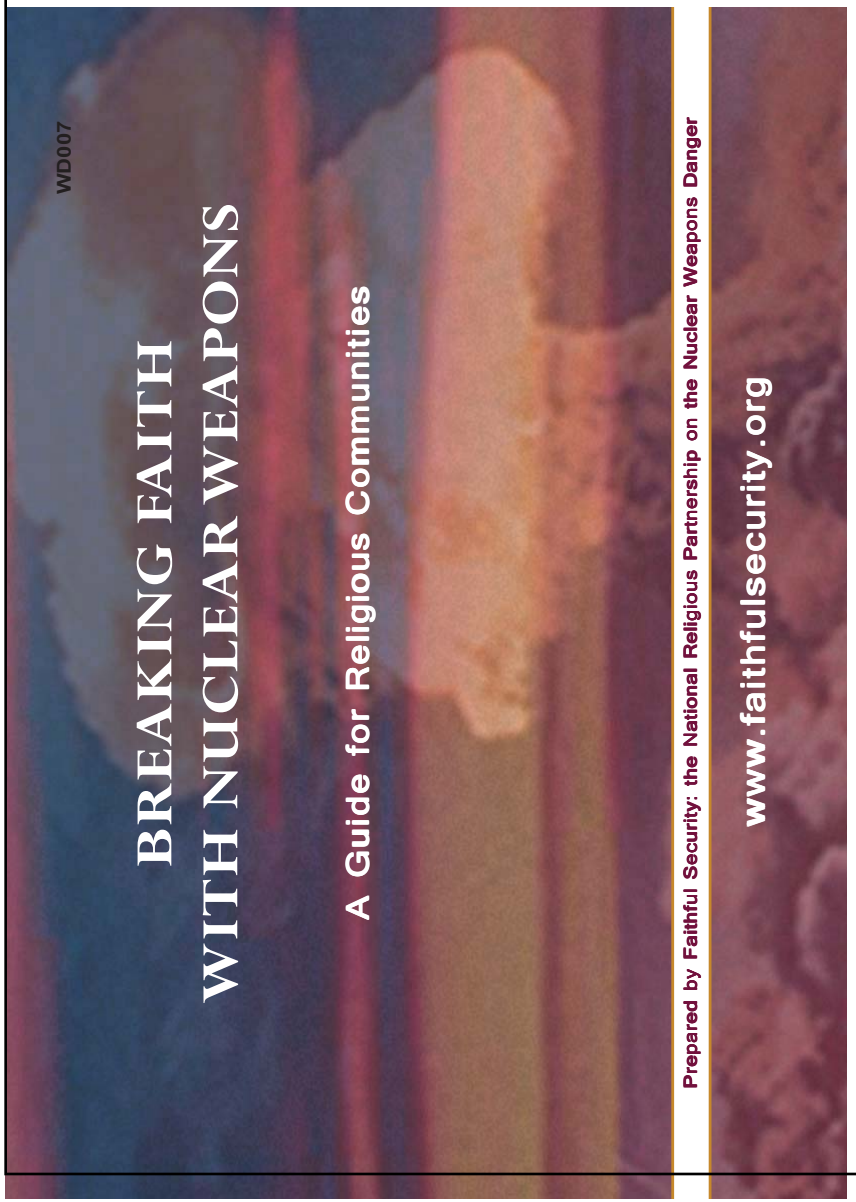

Clark, Donald

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WD007

NUCLEAR INFORMATION AND RESOURCE SERVICE
6930 Carroll Avenue, Suite 340, Takoma Park, MD 20912
301-270-NIRS (301-270-6477); Fax: 301-270-4291
nirsnet@nirs.org; www.nirs.org

"We do not support construction of new nuclear reactors as a means of addressing the climate crisis. Available renewable energy and energy efficiency technologies are faster, cheaper, safer and cleaner strategies for reducing greenhouse emissions than nuclear power."

U. S. Organizational Signers (611 as of 4 pm, September 23, 2009)

National Organizations
Nuclear Information and Resource Service
Greenpeace
Sierra Club
Friends of the Earth
US PIRG
Public Citizen
Clean Water Action
Environmental Working Group
Sun Day Campaign
Institute for Energy and Environmental Research
Physicians for Social Responsibility
Rainforest Action Network
Sustainable Energy and Economy Network
Code Pink
Voters for Peace
Energy Justice Network
Alliance for Nuclear Accountability
Government Accountability Project
Beyond Nuclear
Peace Action
Nuclear Age Peace Foundation
Global Network Against Weapons and Nuclear Power in Space
U.S. Climate Emergency Council
Healthy Building Network
Epsilon Eta—National Environmental Honors Fraternity
NukeFree.Org
Lawyer's Committee on Nuclear Policy
Indigenous Environmental Network
Radiation and Public Health Project

Clark, Donald

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WD007

New Nuclear Weapons: RRW

Union of Concerned Scientists | Fact Sheet

The U.S. Department of Energy (DOE) has proposed the development of a new generation of nuclear warheads. Over the next several decades, the so-called Reliable Replacement Warhead (RRW) program would **redesign and replace the entire U.S. nuclear arsenal with new warheads**. First funded at $9 million in Fiscal Year 2005 (FY05), the Bush administration's request for FY08 is $88.8 million in DOE funding for design and development work and $30 million for the Navy to plan to install RRW warheads on Trident missiles. Through FY12, the total proposed budget for RRW is $725 million.

Trident II missile launch

The Reliable Replacement Warhead Program...

Is unnecessary.

All the evidence indicates that the existing U.S. stockpile of nearly 10,000 nuclear warheads is highly reliable and that it will remain so for many decades. Based on an extensive testing and monitoring program at the three nuclear weapons laboratories, the Secretaries of Energy and Defense have certified to the President, each year since 1997, that **all warhead types in the U.S. nuclear stockpile are safe, secure and reliable**. In late 2006 the JASONs (an independent panel of scientists and engineers that has long advised the U.S. government on nuclear weapons issues) assessed data from plutonium "accelerated aging" experiments conducted at the nuclear weapons laboratories. The report concluded that the plutonium **components in U.S. nuclear warheads have lifetimes of at least 85 years**, and possibly much longer. Since the oldest warheads were built in the 1970s, the core nuclear components of current warheads will remain vital for at least another fifty years.

The initial design of the first new warhead, designated RRW-1, was recently approved, and a First Production Unit is planned to be built by 2012. It would replace the 100-kiloton W76 warhead deployed on U.S. Trident II submarine-launched ballistic missiles. Yet **the W76 does not need to be replaced.** A refurbishment program on the W76 is just beginning that will extend its lifetime for 30 years.

For the first time since the end of the Cold War, the DOE would task the nuclear weapons laboratories to design a new nuclear core (the Nuclear Explosive Package or NEP) containing the fission primary—with its plutonium "pit"—and the thermonuclear secondary device. A nuclear weapon consists of several thousand components, of which the NEP is considered to be the most reliable. The **NEP has few moving parts** and is inherently robust: in formal reporting, it has traditionally been **described as 100% reliable**. In contrast, the least reliable component of the weapon is the delivery system—the missiles or bombers that carry the warheads to their targets. Results from missile flight tests indicate that approximately 15% of the time, some type of delivery system failure would prevent the warhead from reaching its target.

Components of 340 kiloton yield B61 gravity bomb.

Clark, Donald

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WD007

Won't yield REAL nuclear reductions for decades.

Proponents of RRW maintain that the program will lead to reductions in the U.S. nuclear stockpile, particularly in the reserve, or "hedge," forces. By 2012, the United States plans to maintain some 6,000 nuclear warheads, including 2,200 operationally-deployed strategic weapons. The DOE has made clear that **reductions below this level would await creation of a "responsive infrastructure"** that could quickly build additional weapons, including new types, if judged necessary. According to DOE, creating this capability would require developing and producing several new types of RRW warheads, which would take two decades or more. Moreover, a U.S. infrastructure that could quickly produce a large number of warheads would raise concerns among other nuclear weapon states and be a barrier to deep reductions in nuclear arsenals worldwide.

> The RRW could be "misunderstood by our allies, exploited by our adversaries, complicate our work to prevent the spread of nuclear weapons, and make resolution of the Iran and North Korea challenges all the more difficult."
>
> ~ **Sam Nunn**, Congressional Testimony, March 29, 2007

Could lead to new nuclear explosive testing.

The DOE maintains that these new warheads can be deployed without conducting nuclear explosive tests. However, the United States has never certified and deployed a new nuclear warhead design without first conducting a series of full-scale nuclear explosive proof tests. Many weapons scientists are skeptical that a new warhead could be certified to be reliable and safe with the same level of confidence as our existing weapons without nuclear testing. In any case, there would be **tremendous political and military pressure to test any new nuclear designs,** if only to reassure future U.S. politicians, the military and our allies that the new warheads will work as designed.

We Need New Policies, Not New Weapons.

The RRW program would return the nuclear weapons laboratories to the Cold War cycle of nuclear weapon design, development and production. It would preserve and extend an irrational nuclear war-fighting posture left over from the Cold War that makes the United States less secure. Despite the end of the Soviet Union, the United States still maintains thousands of nuclear weapons on high alert, capable of being launched within minutes. **This nuclear posture undermines U.S. nonproliferation goals** and perpetuates the only current threat that could destroy the United States: a Russian nuclear attack—either accidental, unauthorized, or deliberate but based on false information.

Congress should eliminate funding for the RRW program. It is unnecessary: our current nuclear arsenal is safe and reliable. What is needed is **a new nuclear policy that would lead to the elimination of nuclear weapons.** Congress should begin now to consider what such a policy would look like.

For more information, contact Dr. Robert Nelson, Senior Scientist, at rnelson@ucsusa.org or 202-558-5307; or Stephen Young, Washington Representative, at syoung@ucsusa.org or 202-331-5429.

Union of Concerned Scientists
www.ucsusa.org
2 Brattle Square • Cambridge, MA • 02238-9105 • Phone: 617-547-5552 • Fax: 617-864-9405
1707 H St NW, Suite 600 • Washington, DC • 20006-3962 • Phone: 202-223-6133 • Fax: 202-223-6162
2397 Shattuck Avenue, Suite 203 • Berkeley, CA • 94704-1567 • Phone: 510-843-1872 • Fax: 510-843-3785

Clark, Donald

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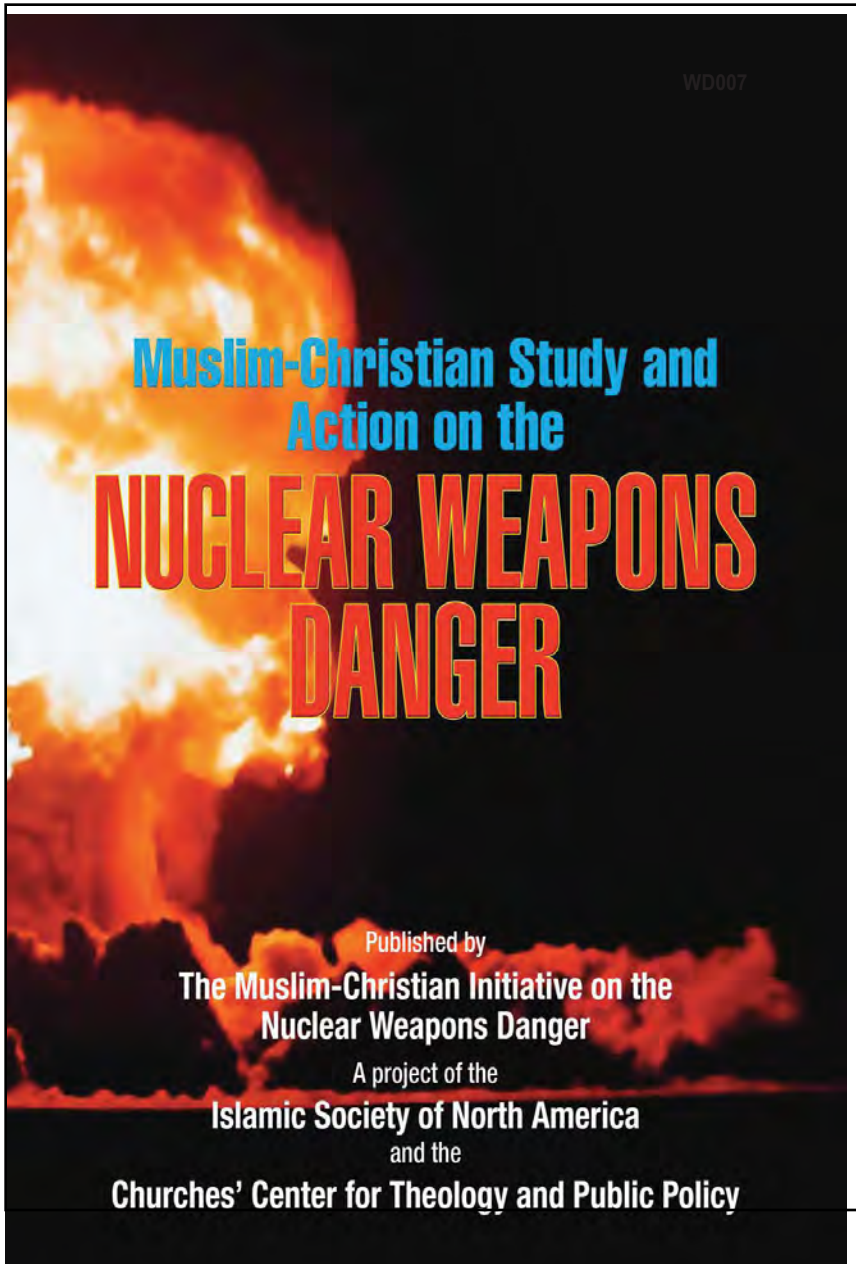

Clark, Olga

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WD048

[redacted]

From: Chris Clark [clclarkusa@gmail.com]
Sent: Monday, December 07, 2009 7:57 PM
To: DIV.Y12SWEIS.Comments
Subject: Form posted from Windows Internet Explorer.

firstName=Olga
lastName=Clark
organization=
email=olgarclark@gmail.com
address1=1813 Hart Road
address2=
city=Knoxville
state=TN
zip=37922
country=USA
subject=Draft Y-12 SWEIS

1|7.0 comments=I have reviewed the draft Y-12 SWEIS online. Building Alternative 4, a Capability-sized Uranium Processing Facility is the right option. We need a facility in the US to process high enriched uranium. Y-12 is the logical place to build the replacement facility.

1

Coghlan, Jay

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WD118

[redacted]

From: Jay Coghlan [jay@nukewatch.org]
Sent: Saturday, January 30, 2010 11:33 PM
To: DIV.Y12SWEIS.Comments
Subject: NukeWatch NM Y12 comments
Attachments: NWNM-Y12 SWEIS draft comments1-30-10.pdf

Dear Ms. Gorman:

Attached are Nuclear Watch New Mexico's comments on the Y12 dSWEIS.

I would appreciate acknowledgment of receipt and readibility.

Thank you,
Jay

Jay Coghlan, Executive Director
Nuclear Watch New Mexico
551 W. Cordova Rd., #808
Santa Fe, NM 87505
Phone and fax: 505.989.7342 cell: 505.920.7118
jay@nukewatch.org
www.nukewatch.org
www.nukewatch.org/watchblog/

1

Coghlan, Jay

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WD118

nuclear watch new mexico

January 30, 2010

Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A500
Oak Ridge, TN 37830

Via email to: y12sweis.comments@tetratech.com and comments@y-12sweis.com

Nuclear Watch of New Mexico respectfully submits these comments for the Draft Site-Wide Environmental Impact Statement for the Y12 National Security Complex in Oak Ridge, Tennessee (DOE/EIS-0387), hereinafter "Y12 dSWEIS." Nuclear Watch is a Santa Fe, NM-based watchdog organization that works both on nuclear weapons policy and related environmental issues, with a particular focus on the Los Alamos National Laboratory (LANL). However, we know that all National Nuclear Security Administration (NNSA) sites are integrated and interlocking parts of a national nuclear weapons complex, in which the whole exceeds the sum of its parts, and therefore take an active interest in Y-12 as well.

The Y12 dSWEIS Should Be Re-Scoped After the Pending Nuclear Posture Review

The original Y-12 SWEIS scoping period was over four years ago. We request that this dSWEIS be withdrawn and re-scoped, which we believe is particularly apt given the newly declared long-term national security goal of eliminating nuclear weapons and a new Nuclear Posture Review (NPR) scheduled for release within a month. It is unseemly for the agency to not wait one more month in the face of its long delay in releasing this Y12 dSWEIS.

More than just the ineffectual adverb "unseemly," arguably NNSA is acting contrary to its legal obligations under the National Environmental Policy Act (NEPA). Council on Environmental Quality NEPA regulations, which the Department of Energy (DOE) had to adopt, states: 1|2.1

> Environmental impact statements may be prepared, and are sometimes required, for broad federal actions such as the adoption of new agency programs or regulations (Sec. 1508.18). Agencies shall prepare statements on broad policy actions so that they are relevant to policy and are timed to coincide with meaningful points in agency planning and decisionmaking. CEQ Regulations for Implementing NEPA, §1502.4, parentheses in the original.

Clearly the soon to be released NPR is a huge "meaningful point in agency planning and decisionmaking." Buttressing that, CEQ NEPA Regulations §1508.18 "Major Federal Action" states:

Coghlan, Jay

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(b) Federal actions tend to fall within one of the following categories:

1…. Formal documents establishing an agency's policies which will result in or substantially alter agency programs.

1|2.I (cont)

2. Adoption of formal plans, such as official documents prepared or approved by federal agencies which guide or prescribe alternative uses of Federal resources, upon which future agency actions will be based.

3. Adoption of programs, such as a group of concerted actions to implement a specific policy or plan; systemic and connected agency decisions allocating agency resources to implement a specific statutory program or executive directive. Ibid., § 1508.18

Again, clearly the pending Nuclear Posture Review falls within the ambit of all of the above.

The "Cover Sheet" to the existing Y12 dSWEIS states:

> NNSA had originally planned to issue the Draft Y-12 SWEIS in late 2006; however, in October 2006, NNSA decided to prepare a supplemental programmatic environmental impact statement (SPEIS) related to transforming the nuclear weapons complex ("Complex Transformation SPEIS"). As a result, NNSA decided to delay the Draft Y-12 SWEIS until the programmatic decisions on the Complex Transformation SPEIS were made. On December 19, 2008, NNSA announced a Record of Decision related to the Complex Transformation SPEIS (73 FR 77644). In that decision, NNSA decided that the manufacturing, storage, and research and development missions involving uranium will remain at Y–12, and NNSA will construct and operate a Uranium Processing Facility at Y–12. This Draft Y-12 SWEIS assesses the potential environmental impacts of reasonable alternatives for implementing that programmatic decision at Y-12.

As the Complex Transformation SPEIS explains "The Nuclear Posture Review establishes the broad outline for future U.S. nuclear strategy, force levels, and infrastructure. The Nuclear Posture Review is a classified report prepared by the Department of Defense." CT SPEIS, p. 1-4. The predecessor to the CT SPEIS is the 1996 Stockpile Stewardship and Management PEIS (which, after all, the CT SPEIS is technically a "Supplement" to). The CT SPEIS continues, "The 1994 NPR defined and integrated past and present U.S. policies for nuclear deterrence, arms control, and nonproliferation objectives. At the time of the 1994 NPR, it was anticipated that the *START II Treaty* would enter into force in 2004. Based on this anticipation, the 1996 SSM PEIS analyzed the potential impacts of reasonable alternatives that might be implemented over a 10-year period." Ibid., p. 2-3.

In Figure 2-1 – "Policy Perspective of the Stockpile Stewardship Program and Complex Transformation" the CT SPEIS depicts how the 2001 NPR is a major policy piece that with others (like international treaties and Presidential Decision Directives) sequentially drive the CT SPEIS' "purpose, need proposed action, and alternatives." It further states, "NNSA has been considering

Coghlan, Jay

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how to continue the transformation of the Complex since the [Bush Administration] Nuclear Posture Review was transmitted to Congress in early 2002." Ibid., 3-1. NNSA now states, "In this new Y12 SWEIS, NNSA continues to assess alternatives for the modernization of Y12, including implementation of the Complex Transformation SPEIS decisions." Y12 dSWEIS, p. S-4.

One CT SPEIS decision was

> Manufacturing and R&D involving uranium will remain at the Y–12 National Security Complex in Tennessee. NNSA will construct and operate a Uranium Processing Facility (UPF) at Y–12 as a replacement for existing facilities that are more than 50 years old and face significant safety and maintenance challenges to their continued operation. CT SPEIS Record of Decision, NNSA, 12/18/08.

The Obama Administration has stated that its new Nuclear Posture Review will be released this March 1. It was originally due before the end of 2009. NNSA first issued a Notice of Intent for a new Y12 dSWEIS on November 28, 2005. Yes, the Obama NPR is late, but we strongly argue that NNSA should have rescoped this Y12 dSWEIS after the release of the NPR. It is not sufficient to predict that the NPR will justify the UPF (maybe it will, maybe it won't). Especially galling, as a minimalist position, is NNSA's decision to not extend the deadline for designated public comment period until at least a few weeks after the release of the new Nuclear Posture Review.

1|2.I (cont)

The Y12 dSWEIS Should Be Re-Scoped Because NNSA Has Changed the Alternatives

The NNSA Federal Register Notice of Intent <http://www.eh.doe.gov/nepa/noi/71270.pdf> dated 11/28/05 notes under Alternatives for the Y12 dSWEIS:

> Alternative 1 includes the No Action Alternative and proposes to modernize the Y–12 National Security Complex around a modern Uranium Processing Facility (UPF). Alternative 2 includes the No Action Alternative and proposes extending the life of existing facilities with only the most cost effective modernization possible without replacing the current structures. Alternative 3 consists of reducing site operations as facilities reach the point where they can no longer be safely operated without significant repairs or modernization.

However, this present Y12 dSWEIS is based on the 2001 Y-12 SWEIS, not the scoping that was done in December 2005 and January 2006, as the document states:

> **S.1.4 Scope of this Y-12 SWEIS and Alternatives**
> This Y-12 SWEIS (DOE/EIS-0387) expands on and updates the analyses in the 2001 Y-12 SWEIS (DOE/EIS-0309) (DOE 2001a), and includes alternatives for proposed new actions and changes since the 2002 Y-12 SWEIS ROD (see Section S.3 for a more detailed discussion of these alternatives). The No Action Alternative for this SWEIS is the continued implementation of the 2002 ROD, as modified by decisions made following analysis in subsequent NEPA reviews.

Coghlan, Jay

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1|2.I (cont) NSA errs in a disconnect between what it solicited for public scoping comment in 2005 and what it does does now in this Y12 dSWEIS. Further, NNSA has expanded the range of legal alternatives from 3 in the 2005 Notice of Intent to five in the present Y12 dSWEIS. We argue this inappropriate course of agency action further buttresses the need to rescope this Y12 dSWEIS.

This Y12 dSWEIS Must Be Site-Wide and Not Just UPF Centered

2|2.F The purpose of the Y12 SWEIS is to update the 2002 Y12 Site-Wide Environmental Impact Statement. The Department of Energy's NEPA regulations that require SWEISs also require a Supplemental Analysis every five years in order to determine whether a new SWEIS should be prepared. In this instance, DOE did not wait five years to begin preparing a new SWEIS—three years after the Record of Decision, which issued from the first SWEIS, on November 25, 2005, NNSA announced its intent to prepare a second SWEIS. This decision was not based on a Supplemental Analysis as required by NEPA regulations, but was driven by the desire to move forward with construction of the Uranium Processing Facility, a decision which NNSA declared not yet "ripe for consideration" in the initial SWEIS. Please explain the timing of this SWEIS.

The Y12 SWEIS is supposed to undertake a comprehensive presentation and analysis of ongoing and future operations, activities and facilities at Y12. The purpose of a SWEIS, rather than a more simple EIS on the Uranium Processing Facility alone, is to take a more comprehensive look—to place proposed actions in the broader context. The Draft Y12 SWEIS fails to provide such analysis and evaluation, describing instead two proposed new construction projects:
1. Facility(s) required to meet uranium production mission requirements (five alternatives are considered, including three sizes of a new Uranium Processing Facility); and
2. A new command post for security and emergency response operations (the Complex Command Center).

3|2.G.1 The environmental impacts of all current and foreseeable operations at Y-12 must be included in a final Y12 SWEIS. The dSWEIS includes a vague assurance that the location for the new CCC will be chosen to avoid CERCLA issues. The description of the new facility contains no evaluation or analysis of environmental impacts associated with the CCC, despite its seven acre footprint. The vague assurance provided in the dSWEIS Summary is insufficient to meet NEPA requirements for Categorical Exclusion let alone an Environmental Impact Statement. Since NNSA has determined that the CCC is covered by this SWEIS, a more thorough environmental analysis must be prepared. It must include consideration of locations (outside the security zone v. proximity for emergency response), impact on remediation activities, an assessment of vulnerabilities associated with a consolidated center, and a complete accounting of costs over the lifetime of the facility. Other reasonable alternatives must be considered, including a No Action alternative.

In today's economic climate—with a proposed three-year freeze on much federal spending and major sectors of the government being asked to endure sacrifices and reductions, NNSA must show that the benefits of the CCC justify the considerable expense of this elective project; it is not enough to declare up-front savings through a privatization scheme. The CCC may be a wise expenditure of public money, and the proposed location may be ideal; but given the absence of

Coghlan, Jay

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WD118

3|2.G.1 (cont) information in the SWEIS, there is simply no way to tell. The public should be able to look at real plans and numbers to determine whether the CCC is a valid, justifiable expense and to comment *before* a Record of Decision is announced.

The vast majority of the dSWEIS is devoted to the facility(s) required to meet the uranium handling, processing and production mission requirements, including an analysis of five "reasonable" alternatives: No Action (NA); Upgrade-In-Place; a new Uranium Processing Facility with a throughput production capacity of 125 warheads/year (UPF125); the "Capability-Sized UPF" with a production capacity range of 50-80 warheads/year (UPF80); and the "No Net Production UPF, with a production capacity of 5 warheads/year (UPF5).

The Uranium Processing Facility Should Be Re-Missioned, Or Not Built at All

4|3.B A key reference document for the Complex Transformation SPEIS, the *Independent Business Case Analysis of Consolidation Options for the Defense Programs SNM and Weapons Programs*, http://www.complextransformationspeis.com/links_ref_pdfs.html ("TechSource 2007a"), noted that all existing nuclear weapons undergoing refurbishment through Life Extension Programs receive a rebuilt Canned Subassembly (i.e., secondary] with old secondaries as the feedstock. (Page 6-2). In many ways this appears to be the unpublicized but main programmatic driver for the Uranium Processing Facility to build these new secondaries.

5|3.C The Y12 SWEIS should explain why rebuilt secondaries are necessary for refurbished US nuclear weapons. There is a plutonium component analogy here, where NNSA use to claim that the reliable lifetime of plutonium pits was on the order of 45 years. In contrast, a review by the independent JASONs concluded that plutonium pits last 85 years or more. It is generally accepted that secondaries are far less complicated and sensitive that plutonium pits. NNSA should specifically answer in Y12 SWEIS the question why rebuilt secondaries are necessary for refurbished US nuclear weapons.

4|3.B (cont) Even in the event that rebuilt secondaries are necessary, NNSA needs to answer the question why a multi-billion dollar Uranium Processing Facility is necessary. Why can't the existing 9212 complex be sufficiently restored and/or upgraded, and related or not why can't some floor space be made available in the new ~$700 million HEU Materials Facility for necessary residual secondary components production? The Y12 SWEIS needs to seriously examine these
6|10.D alternatives that could save American taxpayers serious money and better achieve the newly stated national security goals of suppressing nuclear weapons proliferation by example.

Presentation of Alternatives Must Be Made Clearer

7|2.G.2 The distinction between No Action, which includes a list of upgrades, maintenance and replacement activities already self-approved by NNSA, and Upgrade-in-Place is not clear from the analysis provided. Any assessment meant to inform a decision would have to include costs. None are provided, though statements about employment and economic impact, unsupported by real or estimated dollar numbers, are included in the assessment.

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8|7.B The physical distinction between the UPF80 and the UPF5 is not clear from the information presented in the SWEIS—the description suggests the two alternatives have identical floor space and equipment; the designations of throughput capacity appear to be a distinction without a difference. The only apparent difference is the number of people working, a difference that can be erased by an ad in the newspaper. If there is a real capacity difference between the UPF80 and the UPF5, the SWEIS should make it clear—the proliferation implications are enormous. The UPF80 expands US warhead production capacity and sends a powerfully provocative message to the rest of the world. The UPF5 is more supportive of US nonproliferation goals and indicates a serious US commitment to a nuclear weapons free future.

9|10.C Failure to provide cost estimates is a serious deficiency. The United States is currently in a severe economic recession; funding for many social services and programs are being cut at the very time they are most needed. The cost of each of the proposed alternatives is a significant determinative factor. The SWEIS is long on benefits, especially of its preferred alternatives, and makes claims of cost savings through efficiencies, workforce and footprint reduction, etc. But no legitimate cost estimates of the five alternatives is presented which would allow a comparison of costs and benefits associated with each alternative. A final decision would certainly benefit from such an analysis. We argue that since NEPA requires an analysis of socio-economic impacts, the analysis must be included in the SWEIS and subject to broad scrutiny. Please provide the estimated costs of all alternatives. More strongly put, NNSA has made unsubstantiated claims that "Complex Transformation" will save taxpayers money. Great, we hope so, but in the strongest terms challenge NNSA to back up these claims with credible data.

The recent report of the General Accounting Office on DOE's cost-estimating practice does not inspire confidence in the cost estimates that have been publicized to date about the UPF. Rather than follow accepted procedures for estimating costs, NNSA has provided estimates that apparently have no basis in reality and at least a 50% margin of error—the difference between two and three billion dollars is significant. NNSA should provide reliable cost estimates resulting from approved estimating procedures that allow a fair comparison of the cost/benefits of each alternative.

The Purpose and Need Of This SWEIS Are Based on Outdated Assumptions

This is the starting point for the SWEIS. The purpose and need are predicated on a number of documents and policies, which define the mission requirements at Y12. The SWEIS lists several of the documents, which govern current missions: the 2001 Nuclear Posture Review, the START Treaty (now expired), and the Moscow Treaty. Each of these demonstrates the continuing reduction of the US nuclear stockpile. Diminishing requirements have already led to the decision to downsize the Special Materials Complex.

10|1.A.1 While it is impossible to predict the future with certainty, it is clear that US nuclear weapons policy is in transition. Presidents Obama and Medvedev are preparing to sign a new START Treaty, which will reduce the current stockpile ceiling to 1,675 warheads. President Obama has called these reductions a "first step" toward deeper reductions. Most experts foresee a stockpile size of 1,000 warheads or less within the decade. The Nuclear Posture Review being prepared for President Obama is now expected to be released in March of 2010—it will provide force structure requirements, which will directly impact the mission requirements at Y12.

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After delaying the release of the Draft SWEIS for several years, NNSA has now declined to hold the public comment period open an extra sixty days to allow for an informed engagement with the public after the Y12 mission requirements are clearer. NNSA says it has built in flexibility with alternatives that cover a range of possibilities. This is not preferable to a focused examination of a specific proposal; it is inefficient and places an unnecessary burden on the public to address hypothetical scenarios.

Within these constraints of uncertainty, it is still possible to reflect on the impact on Y12's mission requirements from what *is* known about the future of the US nuclear stockpile.

10|1.A.1 (cont) Five critical facts:
1. The stockpile will continue to get smaller. Reductions set in the START Treaty of 2010 will retire more than 500 warheads; President Obama has indicated his determination to pursue further deep reductions, and President Medvedev concurs.
2. The warheads that remain in the US arsenal will need to be maintained. Given the recent report of the JASON certifying the reliability of the US arsenal, it is clear that a program of surveillance and maintenance will be sufficient to guarantee the reliability of the existing US stockpile for the foreseeable future—at least forty-five years. There is no urgent need for expanded warhead production capacity.
3. There is currently a significant backlog, at least ten years and maybe as many as fifteen years, of retired warheads awaiting dismantlement. Reports from Y12 indicate storage capacity issues for secondaries and cases continue to grow. It is clear that existing capacity is not sufficient to address the dismantlement requirements from previous arms reduction agreements and warhead retirements.
4. The need for dismantlement capacity will grow, rapidly and urgently, as new arms control agreements enter into force. Current facilities, already stretched beyond their capacity, will be expected to absorb and process hundreds more secondaries and cases over the next decade.
5. The US has no need for expanded warhead production capacity. Statements from State Undersecretary Ellen Tauscher in January, 2010, affirm the US will not pursue new warhead design or expanded military capabilities for the nuclear arsenal.

4|3.B (cont) Please explain the purpose and need of the proposed UPF in light of these on-going developments.

The Nonproliferation Impacts of UPF Alternatives Must Be Considered

11|1.E.1 The impact of the UPF decision on US efforts to constrain nuclear proliferation is perhaps more important than the local or regional environmental and socioeconomic impact analyzed in the SWEIS. The SWEIS does not address nonproliferation concerns in detail, which is a shortcoming that must be rectified in the final SWEIS—or addressed in a Supplemental EIS on Nonproliferation Impacts. The Y12 SWEIS refers instead to nonproliferation analysis prepared for the Stockpile Stewardship and Management PEIS in 1996, asserts the program is fully consistent with US obligations under the Nonproliferation Treaty, and further asserts the analysis remains valid.

The arguability of the 1996 assertion is obvious; it was not tested against the expectations or understanding of other NPT parties. To assert that a program designed to extend the life of the

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US nuclear stockpile for the indefinite future is in compliance with the NPT, in which the US promised to pursue in good faith complete disarmament at an early date defies, common sense. The plain meaning of the words of the NPT contradict DOE's 1996 assertion.

The context—indeed the entire landscape—for nuclear nonproliferation discussions has changed so dramatically and so fundamentally that no clear-thinking person can imagine an analysis prepared in 1996 would be anything more than historically interesting. In other words, no analysis of nonproliferation concerns in 1996 can be relied upon with a straight face in 2010; to attempt to do so, as the Y12 SWEIS does, is either a demonstration of ignorance or a clumsy attempt to dodge the most serious and central concern attached to the proposal to build a new weapons production facility. 11|1.E.1 (cont)

Whichever of these explanations lies closer to the truth is not important—what is important is the necessity of a serious, thorough consideration of the nonproliferation impacts, circa 2010, of the proposal to build a new nuclear weapons production facility as part of a complex-wide effort to reconstitute full-scale warhead production capacity.

If the NNSA believes it can move forward with a UPF, or a UPF80, or even an "expandable" UPF5 without undermining US nonproliferation efforts in 2010, it has a responsibility to explain its rationale and subject it to external review.

Purpose and Need Cry for A Reality Check

According to the recent JASON study analyzing the Stockpile Stewardship Program, the US has a safe, secure, and reliable stockpile. Since 1996, more than $90 billion has been spent "modernizing" the nuclear weapons stockpile. By 2018 (the time a new UPF would come on-line) the US stockpile of refurbished "Life Extended" warheads will exceed the maximum number allowed by the START Treaty. 9|1.A.1(cont)

At this point, it seems clear that the idea of a full-scale UPF, or any Alternative that would maintain a production capacity throughput of 125 warheads/year, stands outside the bounds of what is "reasonable." Construction of a $3.5 billion-plus warhead production facility when the US is attempting to regain its stature as an international leader in nonproliferation efforts, to assuage concerns of non-nuclear weapons states on the eve of the NPT Review, and to dissuade Iran from further developing its nuclear capability is not only not reasonable, it is not rational. 12|9.C

The UPF125 is no longer NNSA's bomb plant of choice. Whether NNSA has abandoned its original proposal because it recognized the changing realities of US nuclear stockpile force structure or because it recognized a full-scale UPF would be a hard sell to Congress does not matter. What matters is that the NNSA no longer needs to be able to build 125 secondaries and cases/year. 13|3.A

By a not-so-remarkable coincidence, the warhead production capacity of the preferred alternative is 50/80 warheads per year—not 60/90 or 50/75—and 50/80 warheads per year matches the capacity of the Chemistry and Metallurgy Research Replacement-Nuclear Facility at Los Alamos. No explanation is given for this apparently arbitrary capacity or for the range of 14|7.A

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warheads rather than a target number. Please explain the purpose and need of each of the alternatives' capacities.

At this point, it is clear that the equation of purpose and need has been significantly redrawn since the UPF was first proposed in 2005, and has continued to seek a new equilibrium since the Draft Y12 SWEIS was published in October 2009. The US has now disavowed new warhead production or design, and significant modifications to the existing stockpile. As Ms. Tauscher indicates, this shift is an effort to demonstrate the seriousness of the US commitment to nonproliferation. As the US commitment to nonproliferation grows, the "need" for the UPF80 evaporates. 15|1.D

This leaves on NNSA's table three alternatives: No Action, Upgrade-In-Place, and the UPF5. Each of these is, according to the Y12 SWEIS, examined because it is reasonable. The UPF5 proposes a new facility, cost undeclared, sufficient to meet the needs of a Stockpile Stewardship program that provides passive surveillance and maintenance of the stockpile and can produce a limited number of replacements for components lost during destructive testing. What is most important about the UPF5 is the number—5. NNSA says this is the capacity needed to maintain the existing arsenal.

NNSA identified the UPF80 as its preferred option in the SWEIS (pp. 3-41,42). *Every single benefit of the UPF80 listed accrues equally to the UPF5.* In other words, there is no distinguishing benefit of the UPF80 over the UPF5. On the other hand, the one distinctive difference—the UPF80 reconstitutes full-scale nuclear warhead production capacity—carries a profound liability; it undermines the President's commitment to demonstrate global leadership in disarmament efforts and it ~~corrupts US n~~onproliferation goals. 16|8.A

The draft SWEIS does not adequately provide information to support the square footage requirements asserted for the space in the preferred alternative, what amount of the UPF would be used for what stated purpose and what amount of the facility is set aside for future purposes. This failure to adequately describe space requirements for the individual operational requirements of UPF violates NEPA and prevents the public, elected officials and decision makers from their ability to comment on the analysis. A much more detailed and thorough description of space requirements for the each purpose of the project, the amount of space set aside for future purposes and other information relevant to analyzing the adequacy of the size and scale of the facility proposed in the preferred alternative is required by law. 17|7.C

An Alternative 6 Must Be Analyzed: Dedicated Dismantlement Facility - Consolidate and Down-Size Production Capacity (5 warheads/year) in Existing Upgraded Facility.

As we did in our January 30 2006 Y-12 scoping comments, we again state that dismantlement activities must be more than casually addressed and that an expanded dismantlement alternative must be considered in this SWEIS. 18|9.B

We again suggest that the Y-12 SWEIS must make an agency-wide robust dismantlement program central to its analyses under all alternatives. We still think it best that a mission devoted overwhelmingly to dismantlements should be a sixth formal alternative, but clearly the activity is

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relevant to NNSA's other proposed alternatives, all of which should be infused with expanded dismantlement activities.

18|9.B (cont) Please analyze a sixth alternative to the five outlined in the Y12 dSWEIS. This alternative most fully addresses Y12 mission requirements for the foreseeable future. It has the added virtue of maintaining more jobs than the UPF80 or the UPF5, and achieves the cost savings of a reduced security footprint.

The draft SWEIS does not distinguish between the equipment "needs" for dismantlement of nuclear weapon secondaries at Y-12 and the equipment "needs" for their production, including the production of new and modified designs. While there is some crossover or dual use, it is nonetheless true that one can draw a line between equipment for dismantlement and equipment for production. They are not the same from a technical perspective. They are not the same from a NEPA compliance perspective. Further, the people of the US and the world can and do distinguish between disarmament and dismantlement of nuclear weapons and producing new

19|2.G.3 ones. They are not the same in terms of policy and political impacts.

The draft SWEIS is fatally flawed by its willful refusal to substantively distinguish between these two different activities (production and dismantlements). All of the UPF options presented, including the "preferred alternative" fail to analyze a dismantlement-missioned UPF and distinguish it from the production oriented UPF options. Thus, the alleged alternatives in the draft SWEIS are reduced to being mere variations on the same production theme with only a marginal difference in square footage between them.

The future of Y12 is in dismantling tens of thousands of nuclear weapons. Because this part of Y12's mission has been largely neglected for decades, there is a 12-15 year backlog of retired secondaries and subassemblies awaiting dismantlement and disposition. The backlog is large enough to create storage issues and, on more than one occasion, criticality safety violations.

Y12 projects future dismantlement at a steady rate—but this is not enough to meet the country's needs and certainly not enough to persuade other nations we are aggressively acting to reduce our stockpile and meet our obligations under the NPT. Y12 should establish the capability to

20|9.D more than double its throughput for dismantling nuclear weapons; a new dedicated, single-use facility, with security, safeguards, and transparency designed in, should be built.

The current Y12 SWEIS pays little attention to dismantlement operations, treating them as an adjunct to the production mission of the UPF. Over the course of the next decade, however, the need for production capacity will continue to diminish, and the demand for dismantlement/disposition capacity will balloon. While there is some overlap of operations and equipment used in production and dismantlement operations, DOE/NNSA documents also suggest dismantlement operations can stand alone.

21|9.B We propose construction of a new, single-purpose Dedicated Dismantlement Facility (DDF), equipped only with machines and equipment necessary for dismantlement. The DDF must avoid dual-use capabilities if it is to remain not provocative and internationally verifiable. The facility design should incorporate verification and inspection protocols as they are developed.

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Production capacity for the purpose of stockpile surveillance and maintenance can be accomplished at a 5 warhead/year throughput capacity within an existing facility, a capacity now known to be "reasonable" according to the NNSA. In keeping with the goals of NNSA's

21|9.B (cont) Integrated Facilities Disposition Project, operations can be consolidated and downsized in an existing facility, mostly likely Building 9212, which is slated to receive more than $100 million worth of upgrades in the next decade. Envisioning US participation in an international verification regime during disarmament, safeguard and transparency protocols should be incorporated into the upgrades as they are designed. Throughput capacity of five warheads a year will be adequate to assure the safety and security of the current stockpile as it awaits retirement.

The location of the DDF should be determined by a balancing of mission, security efficiency, and environmental, safety, and health requirements.

21|9.B (cont) The high security footprint could be reduced by as much as 60%. The new, dedicated dismantlement facility could be designed and built at considerable savings over the proposed UPF, and would provide the most efficient and effective technologies for this increasingly critical mission as well as safe working conditions for its workforce over its 50-60 year life span.

The currently operating production facilities can be upgraded to standards protective of worker and public health and safety as well as protective of nuclear materials themselves for $100 million (NNSA's estimate)—a dramatic savings over the estimated $3.5 billion cost of the UPF.

Under NNSA's proposals, a new UPF would have a significant detrimental economic impact on

22|12.H the Oak Ridge community and surrounding regions. Workforce reductions range from 40% (nearly 2,600 jobs lost) in the UPF80 scenario to 48% (3,100 jobs lost at Y12, nearly 11,000 jobs lost in the region) under the UPF5 alternative. Compounding the regional negative economic impact: the jobs to be cut would belong-term, high-salary jobs (annual DOE median salary is $54,000) rather than lower-paying short term construction jobs (industry average $26,000).

Alternative 6 provides a win/win for the local workforce and regional economy. Construction of a new Dedicated Dismantlement Facility along with ES&H upgrades to existing facilities would preserve construction jobs and maximize job security for operational workforces—an increase in dismantlement jobs might be expected to mitigate the impact of any job losses experienced due to the inevitable reduction in Y12's production mission.

21|9.B (cont) In any scenario, the increase in security efficiency combined with a reduction in the high security area footprint will result in a decrease in security employment. Reduction of the high security footprint should permit acceleration of demolition and cleanup projects at Y12 which are currently hampered by security concerns—an aggressive effort by local leaders to secure funding for cleanup could offset losses in the security sector and minimize the regional economic impact. This is true for Alternative 6 as well as NNSA's.

Alternative 6 is the *only* alternative that fully supports the nuclear policy goals of the current Administration: it supports maintenance of a safe, secure and reliable stockpile through passive surveillance and maintenance as the stockpile diminishes toward zero in a way that bolsters US

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nonproliferation efforts on the international stage by demonstrating leadership as called for by President Barack Obama in Cairo, Egypt. DOE's alternatives fail to walk this tightrope, sacrificing US nonproliferation/security goals on the altar of a reconstituted nuclear weapons production complex.

Finally, Alternative 6 has the potential to save billions of dollars, reducing the price tag for new construction from $3 billion for a new UPF, to funding for a new dismantlement facility (cost to be determined, but likely in the neighborhood of $1 billion) and upgrades to existing facilities (NNSA estimate $100 million). The Final Y12 SWEIS should fully analyze the economic impact of Alternative 6. Given the recent findings of the General Accounting Office that "The cost estimates of the four projects we reviewed [one of which was the UPF] lacked credibility because DOE did not sufficiently cross-check the projects' cost estimates with ICEs, use best practices when identifying the level of confidence associated with the estimates, or sufficiently analyze project sensitivities," cost estimates for all alternatives should be subjected to a rigorous outside audit.

21|9.B (cont)

Seismic Events/Natural Phenomena Must be Analyzed

The SWEIS does not address seismic risks in detail. It asserts that, under the No Action alternative, there is no change in risk from earthquakes. In assessing the UPF, the SWEIS states new construction would incorporate protections into the design of the new facility that would reduce risks from seismic activity, but absent specific design information, the SWEIS says a full analysis of consequences of an earthquake are not possible. Nevertheless, the SWEIS declares a UPF designed to Performance Category 3 would be sustain damage "less frequently than in existing facilities."

23|12.M.1

While it is not necessary that Y12 production operations continue uninterrupted in the event of a natural phenomena event, it is crucial that building integrity be maintained for security purposes as well as for worker, environmental and public health protection. It is not clear from the description provided in the SWEIS, that a PC2 or even a PC3 designation provides that level of building integrity.

Similar analysis addressing risks from tornadoes and flooding must also be conducted; the location of Y12 in a narrow valley, combined with the naturally high water table in Bear Creek Valley, indicate a significant risk from floods. The immersion of HEU in water changes criticality calculations dramatically, adding a unique dimension to the analysis required in assessing risks from flooding.

An updated seismic hazards analysis must be done for the Y-12 site.

Accident Scenarios And Risk Analysis Of Release Events Must Be Given A More Thorough Analysis

The actions at Y-12 do not take place in a vacuum; the Y-12 site was added to the Environmental Protection Agency's National Priorities List (Superfund) in December 1989. The Superfund list documents the nation's most pressing environmental contamination challenges. All discussion of future activities and environmental impacts must start from this baseline. The draft Y-12 SWEIS

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should discuss the effects of completed Superfund actions and the future effects of any proposed remedies or mitigation actions.

24|12.J.3

In light of the historic astounding releases of such a dangerous substance, the draft SWEIS should fully document past, present and projected future releases of mercury to all media (soil, water, air); explore the potential harm of past, present and projected future releases to humans, flora, fauna and the environment; and fully describe past, present and future cleanup of mercury in soil, water, and facilities. Generally, the SWEIS should elevate and prioritize Y-12 cleanup of all contaminates as a central mission, which we note is significant in its absence as a site mission in the SWEIS. The draft SWEIS should indeed posit cleanup as a central mission, and discuss future cleanup programs in full.

The SWEIS evaluation of accident scenarios cites methodologies used to "evaluate the potential consequences associated with a release of each chemical in an accident situation." (p. 5-91) This language suggests multiple materials were analyzed for risks to workers, the environment and the public from releases. But the actual accident scenario description says, "the chemical analyzed for release was nitric acid," suggesting only one chemical was used for computer modeling to evaluate consequences associated with a release. There is no indication that nitric acid is a reasonable or realistic substitute for all possible chemical releases—does it match anhydrous hydrogen fluoride, for instance in solubility, migration in soils, dispersion in air? Is nitric acid chosen as a representative of the worst possible chemical released?

Hydrogen fluoride, as used at Y-12, represents the potential for significant health and safety exposures to workers and the off-site public. Please describe and name the computer models used for off-site release scenarios. Please include the raw input data used for these models.

The draft SWEIS mentions lithium in numerous places but neglects to detail the forms in which it is used and the attendant environmental risks. Lithium hydride, for example, is "extremely hazardous" to health (requiring full protective suits); it is flammable and reactive. In particular, it reacts violently with water (including human perspiration).

25|12.M.2

Because little was said about lithium in the draft SWEIS, it is impossible to comment more fully on the specific hazards posed by lithium at Y-12 and how to mitigate them. We note, however, that the weapons activities at Y-12 that would use lithium generally would present all of the above-listed hazards. Therefore, a more complete analysis of lithium risks and mitigation measures must be included in the SWEIS. In this context, we note also the failure to include other hazardous materials used at Y-12 in this draft SWEIS.

The SWEIS should analyze a range of accident/spill scenarios, including multiple contemporaneous excursion events due to catastrophic events. Chemicals and hazardous materials that represent the full range of risks posed by materials used at Y12 should be analyzed. "The purpose of a SWEIS is to provide…an analysis of potential individual and cumulative environmental impacts associated with ongoing and reasonably foreseeable new operations and facilities," [Y12 Draft SWEIS, p.1-22] not a narrow look at one scenario involving one hazardous material or an evaluation of impacts associated with one new facility or operation.

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23|12.M.1(cont) The bounding accident considered in the Y12 SWEIS is an aircraft crash/attack on the UPF. This may, in fact, be the bounding accident for the UPF, but it is not the bounding accident for Y12 site-wide, including the UPF. In the site-wide EIS, an earthquake of magnitude great enough to cause structural failure of several facilities—including the UPF and emergency response and security facilities (the CCC, if built, for instance), with ongoing or uncontrolled releases of hazardous materials—volatiles, fuels, toxic contaminants, uranium, lithium, beryllium, natural gas, mercury—into air and water, loss of material control. This apocalyptic scenario is actually not outside the realm of probability given the confined and compact location of facilities at Y12. A detailed analysis of the cumulative and compounding impacts possible in a severe earthquake or tornado event should be analyzed in the SWEIS as a "bounding event."

26|2.G.4 Please state how DNFSB recommendation 2004-2, Active Confinement Systems, and DNFSB/TECH-34 are being implemented in the UPF. Passive confinement systems are not necessarily capable of containing hazardous and radioactive materials with confidence because they allow a quantity of unfiltered contaminated air to be released from an operating nuclear facility following certain accident scenarios. Please list the type of confinement for each Y-12 facility, including proposed facilities, and the plans for upgrading existing buildings to active systems. Please describe the effects of having these systems, or not, on releases.

The Impacts of D&D on Waste Streams Must Analyzed

Several of the alternatives proposed for the future of Y12—the UPF125, the UPF80, the UPF5, and the Dedicated Dismantlement Facility, will downsize the footprint of Y12's controlled access area and will permit decommissioning and demolition of a number of facilities, some of which are contaminated with radioactive and hazardous wastes from past operations.

27|12.L The SWEIS must analyze the waste streams generated by accelerated D&D, and all of the wastes streams must be fully characterized and quantified. Treatment, disposal and/or storage options for those wastes must be evaluated. In addition, the Y12 SWEIS should identify other cleanup operations which may have an impact on the environment that are likely to take place over the next five to seven years. In cases where waste streams might compete for limited storage or disposal space, the SWEIS should be clear about the criteria that will be used to make decisions. The use of off-site facilities, and the transportation hazards attendant to off-site shipments, should be evaluated and compared to the benefits and hazards of on-site treatment, storage or disposal.

The Draft SWEIS acknowledges that massive waste streams will be generated during D&D but does not analyze them, stating only that they "cannot be estimated without a detailed assessment of the facilities." This is insufficient and does not meet the standard required of a "Site-Wide Environmental Impact Statement" in name. It may be true that it is not possible to fully characterize exact quantities of waste with specificity, but that does not mean gross generalizations are the only thing that can be said [e.g. "D&D activities would also cause health and safety impacts to workers (occupational and radiological), as well as potential health impacts to the public through the release of radiological materials…" p. 5-98]. The Final SWEIS must do better—either attempt a thorough characterization of waste streams, or propose a timeline for preparing a Supplemental EIS on Waste Streams from D&D.

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At present, there is no other forum for a comprehensive analysis of environmental management activities at Y12. This segmentation of cleanup projects has obvious disadvantages—the SWEIS provides a vehicle for at least identifying cross-cutting issues and establishing a minimal level of information that can be used to coordinate cleanup/waste management activities. Since no such vehicle exists otherwise, the SWEIS should be a site-wide environmental impact statement (duh!).

28|12.O

The draft SWEIS fails to adequately analyze the existing contamination and then compounds the failure by not properly prioritizing cleanup in considering the future of Y-12. Cleanup and dismantlement of secondaries are examples of two crucially important (and reasonable and practical) future missions for Y-12 that must receive far more detailed consideration than given in this draft SWEIS.

Risks From Releases Must Be Given A More Thorough Analysis

24|12.J.3 (cont) The SWEIS treatment of potential releases to air and water is partial, incomplete and deficient. It does not list materials/contaminants used at Y12; does not provide information about scenarios in which materials might be released; and does not even use a probability/risk matrix to perform a cursory overview of risks posed by the various materials used in uranium processing operations at Y12. It may be true that some small fraction of these materials is classified, but the vast majority of materials have been documented elsewhere—in the Oak Ridge Health Agreement Steering Panel study, for instance. The SWEIS can provide detailed analysis of these materials and assessment of risks associated with release scenarios without disclosing their purpose.

29|12.J.4 In instances where releases are examined, the analysis must be complete and meaningful. With regard to uranium discharges to the atmosphere, for instance, the amount of uranium released is measured in curies. Uranium is also a toxic heavy metal that carries risks from its chemical properties; these risks must also be evaluated, along with an analysis that combines the biologic and radiologic risks. Use of curies as unit of measure gives no hint to the amount of material released or its particle size, or its toxic burden.

An example of the level of detail appropriate for analysis in the SWEIS can be found on pages 2-16 and 2-17 of the Draft SWEIS, where NNSA provides detailed descriptions, including quantities, of reductions in materials through the Pollution Prevention, Conservation and Recycling Programs.

Effects On Water Quality Must Be Analyzed For All Foreseeable D&D Projects

30|12.D Water quality, particularly the negative impact of Y12's operations on East Fork Poplar Creek, continues to be a concern. The SWEIS indicates 70kg of uranium was released offsite through liquid effluent in 2007 (apparently the most recent year for which numbers are available). The SWEIS also indicates NNSA has appealed for relief from water permits, and that mercury releases at Station 17 exceed Tennessee Water Quality Criteria 75% of the time.

As noted above, D&D and likely new construction has the potential to add to this burden, and the site-wide EIS is the starting point for an assessment of the characteristics of that additional

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burden. The effects on water quality must be analyzed for all foreseeable D&D projects and for all operations at the Y-12 site.

Nuclear Materials From Other Locations Must Be Analyzed

Y12's mission includes support for the Global Threat Reduction Initiative. Y12's role is to support the retrieval, processing and disposition of Special Nuclear Materials. The SWEIS addresses this mission (p. 5-94ff) and refers to documentation prepared for previous shipments of materials to Y12.

The treatment in the SWEIS of materials received from foreign sources is inadequate. Impacts are assessed only for Special Nuclear Materials. In reality, special nuclear materials are often only part of the total material received. During Project Sapphire, for instance, more than 100 barrels of waste were shipped to Y12; the amount of uranium was only 1,245 pounds, a miniscule fraction of the total amount of waste material imported to Y12. Environmental documentation ignored this other waste material. At the time the Project Sapphire EA was completed, and a Finding of No Significant Impact issued, DOE had not even fully characterized the accompanying materials to determine what hazardous or toxic materials might be present. It was asserted that characterization of a random sampling was sufficient, though the contents of 100 barrels were not homogenous.

31|12.Q

The analysis of impacts from the GTRI must be comprehensive and detailed; the impacts of all materials, not just the Special Nuclear Material, must be included. In some cases this will be a relatively easy project. In other cases, like Project Sapphire, it may require an intensive effort. In all cases, workers and the public should be assured ahead of time ("before decisions are made," p. 1-22) that Y12 has the capacity and the capability to safely manage and dispose of *all* material associated with shipments under the GTRI, not just special nuclear materials.

Work For Others Must Be Analyzed

The Work for Others Program at Y12 has continued to grow over the last nine years, since the last SWEIS. Work for Others Program activities should be described in detail in this SWEIS, along with the facilities in which the work takes place, materials used, waste streams generated, potential impacts of releases, etc.

32|12.R

Analyze Climate Change Effects– Just Do IT

The DOE NEPA Lessons Learned Quarterly for June 2009 states, "Given the advances in climate science, extensive litigation, and potential regulation, there is a little doubt that DOE will need to analyze the reasonably foreseeable effects of greenhouse gas (GHG) emissions in its NEPA documents," said Eric Cohen, Office of NEPA Policy and Compliance, to participants at the NEPA Compliance Officers meeting. Currently, there is little Federal agency guidance on climate change and NEPA, he said, so DOE's guidance could be among the first. While guidance is being developed, Mr. Cohen recommended taking a "just-do-it" approach to considering GHGs in EAs and EISs" (pg. 12).

33|12.S

There is little doubt that DOE must evaluate GHG/climate change impacts under NEPA. Please use the Ten-Step Approach to Addressing GHG and Climate Change Impacts *from Ron Bass's presentation, "NEPA and Climate Change: What Constitutes a Hard Look?"* The recommended

Coghlan, Jay

Page 18 of 19

WD118

10-step approach takes into consideration the existing provisions of the NEPA regulations, recent court decisions, and various state programs. The steps conform to the main elements of a NEPA document.

Affected Environment

Step 1 – Describe the existing global context in which climate change impacts are occurring and are expected to continue to occur in the future.

Step 2 – Summarize any relevant state laws that address climate change.

Step 3 – Describe any relevant national, statewide, and regional GHG inventories to which the project will contribute.

Environmental Consequences

Step 4 – Quantify the project's direct and indirect GHG emissions.

Step 5 – Convert the GHG emissions into carbon equivalents using an established "carbon calculator."

33|12.S (cont)

Step 6 – Discuss whether the project would enhance or impede the attainment of applicable state GHG reduction.

Step 7 – Describe the cumulative global climate change impacts to which the proposed action would contribute, i.e., the impacts of the project on climate change. (This may use the same information as in Step 1.)

Step 8 – Describe how the impacts of global climate change could manifest themselves in the geographic area in which the project is proposed, and therefore potentially affect the project, i.e., the impacts of climate change on the project (e.g., sea level rise could affect a coastal project).

Alternatives

Step 9 – Include alternatives that would meet the project objectives but would also reduce GHG emissions.

Mitigation Measures

Step 10 – Identify mitigation measures that would reduce GHG emissions, including both project design or operational changes and potential compensatory mitigation (e.g., carbon offsets).

Analyze All Potential Cumulative Environmental Effects Of Past, Present, And Reasonably Foreseeable Future Actions

The cumulative impacts of all nearby facilities, including ORNL and ETTP, must be examined, including accidents at nearby facilities. This project is connected to the already completed HEUMF, both physically and in terms of its environmental impacts. In addition the Consolidated Manufacturing Complex (CMC) that is planned for the near term future at Y-12 will also be linked to these facilities. The DOE is required by NEPA to analyze connected actions together in one Environmental Impact Statement. By improperly segmenting the HEU storage (HEUMF), HEU processing (UPF), and the "production operation zone" upgrades, (which are envisioned as developing into a small complex or possibly a CMC) the required "hard look" at the cumulative impacts of these facilities together is avoided.

34|12.N

Pursuant to the CEQ's NEPA regulations, "'Cumulative impact' is the impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions." 40 C.F.R. §1508.7. The cumulative impacts section of the draft SWEIS unreasonably fails to include a look at the connected impacts of the three facilities in one NEPA review document.

Coghlan, Jay

Page 19 of 19

WD118

34|12.N (cont) Cumulative impacts and synergistic effects of potential releases must be analyzed, include all other known existing and possible future contaminants. Describe any additional DOE or NNSA actions potentially impacting operations at Y-12. A 50km radius must be examined for potential cumulative impacts.

- End of Comments -

Respectfully submitted,

Jay Coghlan, Executive Director
Scott Kovac, Operations Director
Nuclear Watch New Mexico

Corcoran, David

Page 1 of 1

WD061

[redacted]

From: David Corcoran [dcorcor@sbcglobal.net]
Sent: Sunday, January 03, 2010 2:38 PM
To: DIV.Y12SWEIS.Comments
Subject: Form Post from Firefox

firstName=David
lastName=Corcoran
organization=
email=dcorcor@sbcglobal.net
address1=834 South Wolf Road
address2=
city=Des Plaines
state=IL
zip=60016
country=USA
subject=Draft Y-12 SWEIS
1|14.0 comments=Get rid of ALL Nuclear Bombs. We don't need them. They are a treat and a hazard to world peace. NO NEW NUKES are necessary or even maintaining the old ones.

1

Cordell, Terry

Page 1 of 1

WD112

[redacted]

From: Terry Cordell [tjcordell@live.com]
Sent: Friday, January 29, 2010 7:44 PM
To: DIV.Y12SWEIS.Comments
Subject: Prefer OREPA alternative 6

Dear Ms. Gorman,
I hope it is not too late for me to let you know that:

1|9.A • I prefer the OREPA (Oak Ridge Environmental Peace Alliance) alternative 6, which would only cost 100 million and would not include the actual making of nuclear bombs in Oak Ridge, Tennessee;

2|3.A • I think it is senseless and irresponsible to spend billions on a facility which, by the time it is completed in 2018, will no longer be needed because the US stockpile of "life extended" warheads will exceed the number allowed by the START treaty at that point, and our focus should be on reducing the stockpile of nuclear bombs;

3|12.H • I think it would also not make sense to lose the 2,500 jobs that would be lost in Oak Ridge with the new facility, since it would be largely automated.

Thank you.
Terry Cordell
Asheville, NC

1

Crowe, Charles

Page 1 of 1

WD076

[redacted]

From: Charles Crowe [crowecd@bellsouth.net]
Sent: Monday, January 25, 2010 4:24 PM
To: DIV.Y12SWEIS.Comments
Subject: Comments

To whom it may concern.

1|7.0 I am a local business owner and have lived in Oak Ridge, TN for the past 32 years. I support NNSA's Preferred Alternative (#4) to construct the Uranium Processing Facility (UPF) and the Complex Command Center (CCC) at the Y12 Nuclear Security Complex in Oak Ridge, TN, and feel it is important to the continued growth and stability of this community.

Charles Crowe
129 Mockingbird Lane
Oak Ridge, TN 37830

C&C Specialty Advertising LLC
(865) 482-3555
Fax: 483-8408

1

Dale, Sigrid

Page 1 of 1

Jan. 21, 2010

MD062

Dear Ms. Gorman,

Thank you for your willingness to listen to ordinary citizens regarding the draft SWEIS for the Y-12 National Security Complex in Oak Ridge, TN

1|14.0 I'm very much opposed to the plans for a new Uranium Processing Facility at Y-12. As a very

2|3.A wise man has said, nuclear weapons are immoral, profoundly dangerous, illegal, hugely expensive and unnecessary. With the increasing poverty in our

3|10.B country, throwing $ 3.5 billion to continue work on a new nuclear weapons plant is outrageous! And what

4|1.E does that say to potential enemies like Iran and North Korea, whom we are forbidding to create nuclear weapons. I believe this to be the right of hypocrasy, especially at a time when our President has said he wants to see a world without nuclear weapons.

5|9.A As a follower of Jesus I strongly support "Alternative 6" as proposed by the Oak Ridge Environmental Peace Alliance.

Sincerely
Sigrid Dale
Warren, MI

Sigrid Dale
Warren, MI 48092

Davis, Lincoln

Page 1 of 1

LINCOLN DAVIS
4TH DISTRICT, TENNESSEE

SENIOR WHIP

MD018

COMMITTEES:
APPROPRIATIONS
SUBCOMMITTEE ON AGRICULTURE, RURAL DEVELOPMENT, FOOD AND DRUG ADMINISTRATION, AND RELATED AGENCIES
SUBCOMMITTEE ON ENERGY AND WATER DEVELOPMENT

Congress of the United States
House of Representatives
Washington, DC 20515–4204
November 17, 2009

Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike
Suite A-500
Oak Ridge, Tennessee 37830

Dear Ms. Gorman,

1|13.0 Please accept this letter as acknowledgement of my full support for the construction of a new capability-sized Uranium Processing Facility at the Y-12 National Security Complex in Oak Ridge to replace the site's current World War II era production complex.

As the Representative to Tennessee's Fourth Congressional District, I have a great appreciation for the critical national security role our men and women serve each day at the Y-12 National Security Complex. Over the past few years, I have had the pleasure of witnessing the tremendous transformation of the Oak Ridge site as the National Nuclear Security Complex prepares to meet our future national and global security challenges. We now must continue this momentum by focusing our attention on the hub of our nation's nuclear security operations, Y-12's uranium processing facilities, which were built more than 50 years ago and are in dire need of replacement.

1|13.0 (cont) I urge the National Nuclear Security Administration (NNSA) to move swiftly in replacing these facilities with a new capability-based Uranium Processing Facility at Y-12. It is imperative we build a better and more secure facility that will be safe and provide protection to our workers who have dedicated their lives to this critical security mission.

It is with great pride and gratitude that I give my support to NNSA's decision to maintain our nation's important uranium mission at Y-12 by constructing the new capability-sized Uranium Processing Facility.

Sincerely,

Lincoln Davis
Member of Congress

Cc: NNSA Administrator Tom D'Agostino
NNSA Y-12 Site Office Manager Theodore Sherry

410 CANNON HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
(202) 225-6831
FAX: (202) 226-5172

629 NORTH MAIN STREET
JAMESTOWN, TN 38556
(931) 879-2351
FAX: (931) 879-2388

477 NORTH CHANCERY STREET
SUITE A-1
MCMINNVILLE, TN 37110
(931) 473-7251
FAX: (931) 473-7256

1064 NORTH GATEWAY AVENUE
ROCKWOOD, TN 37854
(865) 354-3323
FAX: (865) 354-3310

1004 CONNACT BOULEVARD
SUITE A
COLUMBIA, TN 38401
(931) 490-6686
FAX: (931) 802-8875

WWW.HOUSE.GOV/LINCOLNDAVIS

Davis, Phil

Page 1 of 1

WD098

[redacted]

From: phildavisdds [phildavisdds@bellsouth.net]
Sent: Friday, January 29, 2010 9:56 AM
To: DIV.Y12SWEIS.Comments
Subject: OREPA alternative 6

1|9.A Please go with OREPA alternative 6 to halt the new bomb making facility. We really don't need that.
2|10.B Put money into rebuiding bridges and rapid rail passenger transit.
THANKS!
Phil Davis
Asheville, NC

1

Delap, Ann

Page 1 of 1

WD043

[redacted]

From: Ann Delap [anndelap@bellsouth.net]
Sent: Thursday, November 26, 2009 11:32 AM
To: DIV.Y12SWEIS.Comments
Subject: Form posted from Windows Internet Explorer.

firstName=Ann
lastName=Delap
organization=
email=anndelap@bellsouth.net
address1=5812 Toole Dr.
address2=
city=Knoxville
state=TN
zip=37919
country=
subject=Draft Y-12 SWEIS
comments=Why in the world do we need a new bomb plant? How do weapons of aggression make our country more secure? If we build more bombs, it just encourages our enemies to do the same, escalating
1|3.A tensions around the world.

I realize that many favor any project that promises new jobs, something our economy desperately needs, but why not put people to work dismantling outmoded WMD's? Can't we accomplish this by upgrading existing facilites? We also need to continue the clean-up efforts in Oak Ridge and other places contaminated with nuclear waste.

2|14.0 Oak Ridge needs to shed its "Cold War" mindset and come up with a new mission, something that will lead us into the future. The real threat to our future is diminishing resources (water, food, energy, etc.)due to climate change and overpopulation. We owe it to our children and future generations to apply our energy, our intellect and our increasingly scarce financial resources to the real challenges ahead. More bombs is NOT the answer.

1

Denton, Kim

WD109

[redacted]

From: Kim Denton [denton@orcc.org]
Sent: Friday, January 29, 2010 4:04 PM
To: DIV.Y12SWEIS.Comments
Subject: Y-12 SWEIS

Dear Ms. Gorman,

I am writing on behalf of the Oak Ridge Economic Partnership board of directors in reference to the Y-12 National Security Complex Site-wide Environmental Impact Statement. The Oak Ridge Economic Partnership leads the business recruitment, expansion and retention efforts for the City of Oak Ridge.

The Partnership board strongly favors NNSA's Alternative 4: Capability-sized Uranium Processing Facility, which includes the construction and operation of a smaller UPF (350,000 SF) with a throughput of approximately 50-80 secondaries and cases per year, and the construction and operation of a new Complex Command Center.

In step with the Oak Ridge Chamber of Commerce, the Oak Ridge Economic Partnership board respectfully encourages actions from the United States Congress that will support Alternative 4 due to the following rationale:

1|7.0

- Improved operational reliability
- Improved security posture for special nuclear materials
- Improved health and safety for workers and the public
- Highly attractive return on investment

Without UPF, the reliability of existing facilities will continue to erode because of aging facilities and equipment. By proceeding with Alternative 4, operating and maintenance costs will be reduced by approximately 33% from current operations. Further, reducing the cost of the high security area would produce an average annual savings over the 50-year facility life of $205 million in FY 2007 dollars.

On behalf of the Oak Ridge Economic Partnership board of directors, I appreciate the opportunity to weigh in on the most important issue regarding our nation's security.

Respectfully,

Kim K. Denton

Kim K. Denton, CEcD, President
Oak Ridge Economic Partnership
(865) 483-1321
www.oakridgetn.org
Oak Ridge -- The Energy City

Duncan Jr., John

MD020

JOHN J. DUNCAN, JR.
2ND DISTRICT, TENNESSEE

2207 RAYBURN HOUSE OFFICE BUILDING
WASHINGTON, DC 20515–6202
PHONE: (202) 225–5435
FAX: (202) 225–6440

800 MARKET STREET, SUITE 110
KNOXVILLE, TN 37902
PHONE: (865) 523–3772
FAX: (865) 544–0720

200 E. BROADWAY AVE, SUITE 514
MARYVILLE, TN 37804–5782
PHONE: (865) 984–5464
FAX: (865) 984–0521

8 EAST MADISON AVENUE COURTHOUSE
ATHENS, TN 37303–4257
PHONE: (423) 745–4671
FAX: (423) 745–8025

COMMITTEES:
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WATER RESOURCES AND ENVIRONMENT
AVIATION

NATURAL RESOURCES
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NATIONAL PARKS, FORESTS, AND PUBLIC LANDS

OVERSIGHT AND GOVERNMENT REFORM
SUBCOMMITTEES
NATIONAL SECURITY AND FOREIGN AFFAIRS
GOVERNMENT MANAGEMENT, ORGANIZATION, AND PROCUREMENT

Congress of the United States
House of Representatives
Washington, DC 20515–4202

November 16, 2009

Ms. Pam Gorman
Y-12 SWEIS Document Manager
Y-12 Site Office
800 Oak Ridge Turnpike
Suite A 500
Oak Ridge, Tennessee 37830

Dear Ms. Gorman:

I am pleased to contact you today on behalf of the thousands of employees who report to work at the Y-12 National Security Complex each day.

1|13.0

Y-12 has played a very important role throughout our Nation's history. With the adoption of the Capability-sized Uranium Processing Facility Alternative, the future of Y-12 can be secured as the pre-eminent highly-enriched materials site in the Nation.

1|13.0 (cont)

Y-12 is already home to the Highly Enriched Uranium Materials Facility, which, through no modest taxpayer investment, and no small amount of dedication by its employees, sets Y-12 apart from much of the rest of the nuclear weapons complex. It is my hope that the Capability-sized UPF Alternative will allow the NNSA to make the necessary investments into modernization that will preserve our nuclear capabilities while protecting the taxpayer at the same time.

With kindest regards, I am

Yours truly,

JOHN J. DUNCAN, JR.
Member of Congress

JJD:jg

Earley, Patte

Page 1 of 1

WD072

[redacted]

From: Patte Earley [pcearley@centurylink.net]
Sent: Saturday, January 23, 2010 11:01 AM
To: DIV.Y12SWEIS.Comments
Subject: Form posted from Windows Internet Explorer.

firstName=Patte
lastName=Earley
organization=
email=pcearley@centurylink.net
address1=1923 Waters Edge Dr
address2=
city=Johnson City
state=TN
zip=37604
country=
subject=Draft Y-12 SWEIS
1|1.E comments=Please do not build the Urnaium Procesing Facility in Oak Ridge TN. By building this facility we are encouraging proliferation of nuclear weapons world wide. US needs to set an example of non-proliferation for the rest of the world if we expect other countries to not build nuclear weapons.
rod=Record of decision

1

Ellis, Jeff

Page 1 of 1

Jan 20 2010 4:36PM YSO Front Office 865 576 1237 page 1

FD002

Draft Y-12 Site-wide Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

NNSA National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010

1|7.0 I support the Capability - Sized UPF Alternative

Thank you
Jeff Ellis
Delta Research Associates,
Y-12 Site Office
(865) 576-2406

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:
http://www.Y12sweis.com

Ezelle, J.

Page 1 of 1

OR2D01

Draft Y-12 Site-wide Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

Written Comment Form
Must be received on or before January 29, 2010.

The Y-12 Plant is the most logical and cost effective location for the UPF, since the co-location with HEUMF will enhance Safeguards & Security by decreasing shipments of HEU cross-country. Furthermore, experienced, technically cognizant employees are available at Y-12 to support the safe and efficient operation of HEUMF & UPF. I support the environmentally & fiscally sound location of UPF at Y-12, Oak Ridge.

Respectfully,
J. Don Ezelle
J Don Ezelle 11-18-09
865.576.8862
9110 Timber Oaks Ct.
Knoxville, TN 37922

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:
http://www.Y12sweis.com

Farmer, Mike

Page 1 of 1

MD007

Office of the County Executive
Roane County Courthouse

November 13, 2009

Ms. Pam Gorman
Y-12 SWEIS Document Manager
Y-12 Site Office
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Dear Ms. Gorman:

1|13.0 I am writing you as County Executive of Roane County in support of the proposed Uranium Processing Facility (UPF) at the Y-12 National Security Complex in Oak Ridge. This facility will be another anchor to the modernization initiative currently underway at Y-12. The draft Site-Wide Environmental Impact Statement (EIS) presents this as the preferred option from several alternatives considered.

Prior to being elected County Executive of Roane County I worked inside the Y-12 plant and have a unique working knowledge of its operation. Also, portions of the Oak Ridge DOE Complex, as well as the City of Oak Ridge, are in Roane County.

1|13.0 (cont) Our county and region have always been strong supporters of the uranium processing and nuclear related missions of the Oak Ridge complex. Our region has invested in the development of a highly skilled workforce that has always been responsive to the safe conduct of the operations associated with these missions for more than 60 years. We are prepared to continue to fully support such missions and to continue to invest in regional workforce development that is required for these operations. We do believe that Y-12's continued role in manufacturing and

2|3.B disassembling nuclear warhead components should be conducted in modernized facilities with cost effective and safety focused processes. We think this preferred option of a new UPF achieves this objective.

Thank you for your consideration of these comments. Please include them in the official record of this EIS.

Sincerely,

Mike Farmer
Roane County Executive

MF:sl
cc: Ted Sherry
Congressman John Duncan
Congressman Lincoln Davis
Congressman Zach Wamp
Senator Lamar Alexander
Senator Bob Corker

P.O. Box 643 • Kingston, TN 37763 • Phone: 865.376.5578 • Fax: 865.717.4215

Flagg, Thomas

Page 1 of 1

WD037

[redacted]

From: thomas flagg [drdodrdo@earthlink.net]
Sent: Friday, November 20, 2009 8:49 AM
To: DIV.Y12SWEIS.Comments
Subject: no new atomic weapons

1|14.0 i vote "no" on the topic of new atomic weapons. rather, let's finally begin to dismantle the atomic weapons we now have. and let's involve other nuclear weapons nations to do the same!!

thomas flagg
drdodrdo@earthlink.net
EarthLink Revolves Around You.

1

Ford, Dean

Page 1 of 1

WD051

[redacted]

From: Dean Ford [dford006@comcast.net]
Sent: Thursday, December 10, 2009 9:02 PM
To: DIV.Y12SWEIS.Comments
Subject: Site Wide EIS comments

firstName=Dean
lastName=Ford
organization=
email=dford006@comcast.net
address1=11310 Lancaster Ridge Dr.
address2=
city=Knoxville
state=TN
zip=37932
country=United States
subject=Draft Y-12 SWEIS

1|3.B comments=I think we need to replace the current facilities. Y-12 serves an important mission and the buildings and equipment being used needs to be replaced and upgraded. The current facilities are so old the are unsafe to be in , to work in and are just environmentally unsound. For the safety of the workers and the pubic they need to be replaced. The current facilities were not designed or built with the current environmental regulations in mind. They have been used for processes over the years that they were never really suited for and many of them just need to be torn down and replaced. Some of the equipment is so old the rest of industry quit using years ago. The Complex Command Center needs to be replaced and consolidated to provide better service to the site and better protection for the surrounding areas in case of an emergency.

1

Freeman, Jenny

Page 1 of 1

WD038

[redacted]

From: Jenny Freeman [jfreeman@stratag.org]
Sent: Friday, November 20, 2009 11:51 AM
To: DIV.Y12SWEIS.Comments
Cc: nithin@eteba.org; 'Richard Macon'
Subject: Comments on SWEIS for Y-12

Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike
Suite A-500
Oak Ridge, TN 37830

Ms. Gorman:

1|7.0 I would like to go on record as supporting Alternative 4, Capability-Sized UPF Alternative to construct and operate a new UPF at the Y-12 National Security Complex that would have a reduced capacity while maintaining all enriched uranium processing capabilities. In addition, I support the construction of an emergency management Complex Command Center. These two key components of modernization of Y-12 are essential to the future of the site.

Thank you very much,

Jenny M. Freeman

865-934-3400

371 East Dr. Oak Ridge, TN 37830

1

Garvey, Lydia

Page 1 of 1

11.20.09 MD031

Ms Lydia Garvey
429 S 24th St
Clinton, OK 73601-3713

Dear Ms. Gorman,

Alternative 6! Current production facilities need to be consolidated, down-sized, meeting environmental, safety & health standards by envisioning U.S. participation in international verification for disarmament, safeguard & transparency protocols. A new facility for disposition of retired nuclear weapons needs to be constructed. This would cost $100 M – VS. $3.5 B for UPF! The sanity is clear.

1|9.A

Ending global nuclear proliferation by building more arsenals – is as credible as preaching abstinence & get real. Nukes are toxic – from start to finish.

Your attention to this most urgent matter would be much appreciated by all present & future generations of all species.

Do your job! You work for citizens – Not industry.

Thank-you,

Gawarecki, Susan

Page 1 of 2

LOC INC
Oak Ridge Reservation
Local Oversight Committee

July 9, 2010

Ms. Pam Gorman
NNSA Y-12 Site Office
Y-12-10
P.O. Box 2050
Oak Ridge, TN 37831

Y-12 SITE OFFICE
COR- 912-7/16/2010-90740
File Code

Subject: Y-12 Wetland Assessment

Dear Ms. Gorman:

The following comments are submitted regarding Appendix G – Wetlands Assessment for the Y-12 National Security Complex. These are transmitted on the deadline by e-mail and will be followed by a hard copy for your files.

1|12.T.1 1. Nowhere in the notice or document does it specify what the parent document is for Appendix G. This makes it difficult for stakeholders to put it in the appropriate context and examine the actions that make the haul road necessary and whether it was proposed in the larger document.

2|12.T.2 2. Two permits for this action were applied for prior to this wetlands assessment being released. The applications should have been done after public input was received and the decision finalized. By applying for the permits first, Y-12 gives the appearance that it will proceed with the proposed action with no regard for public opinion.

3|12.T.3 3. There is confusion regarding the proposed Haul Road extension. "Haul Road" is the commonly understood name of the road that is used to transport waste from East Tennessee Technology Park to the CERCLA Waste Facility. The confusion could be alleviated by including a map of the area that shows the relationship between the UPF site, the various resource sites, the affected wetlands, Bear Creek Road and the CERCLA Waste Facility and its haul road. The use of annotated photographs is insufficient to show the geographic relationships, and the labels of locations on the photos are too tiny to be readable.

4|12.T.4 4. Section 2.1 states "Although the primary use for the Haul Road extension would be for construction activities related to UPF, it could also be used to support other Y-12 activities (e.g., future EM cleanup activities at Y-12)." If it does not connect to the CERCLA haul road, then how would support of future cleanup activities be justified? Unless there are well established future needs, it would be preferable to plan for the decommissioning of the Haul Road extension and restoration of affected wetlands after the UPF is finished.

5|12.T.5 5. The document seems to imply that soil will be taken from borrow areas for fill and excess soils placed at spoils sites, all accessed by the Haul Road. Appropriate planning for UPF site preparation can minimize the amount of soils transported; soils cut from the site should be used for fill where needed. This will also help control construction costs.

6|12.T.6 6. Section 2.3 – The document should give the cost comparison between widening Bear Creek Road and extension of the Haul Road. Additionally, transportation always involves risks, and one must assume that tractor trailers and other large vehicles use Y-12 roadways on a regular basis, with automobile drivers exercising appropriate caution. It is unclear why large dump trucks are expected to pose a special risk.

Anderson • Meigs • Rhea • Roane • City of Oak Ridge • Knox • Loudon • Morgan

102 Robertsville Rd., Suite E • Oak Ridge, Tn 37830 • Phone (865) 483-1333 • (888) 770-3073 • Fax (865) 482-6572 • loo@icx.net • www.local-oversight.org

Gawarecki, Susan

Page 2 of 2

7|12.T.7 7. In general, it is undesirable to fragment habitats, whether they are wetlands or not. NNSA should reconsider whether existing roadways can be used to support construction of the UPF. The impacts to Bear Creek from widening of Bear Creek Road are likely minimal compared to the habitat and wetland damage and fragmentation from constructing 1.2 miles of Haul Road, which at 40 feet in width equals habitat destruction totaling nearly 6 acres.

Finally, I would like to address your refusal to extend the comment deadline. The Local Oversight Committee's (LOC) Citizens' Advisory Panel (CAP) was not able to review, modify, and approve these comments because the release of the document and its comment deadline fell between the monthly meetings. The CAP is composed of stakeholders from the greater Oak Ridge area and has a strong interest in the use and management of Oak Ridge Reservation lands. As a matter of fact, we are all stakeholders in this effort together.

8|12.T.8 None of the reasons you listed for not extending the deadline are compelling; you seem to imply that because you have done the minimum required, you do not need to accommodate a stakeholder group's request. This is a far cry from the excellent working relationship that the LOC and CAP (as well as other community stakeholders) have cultivated with Oak Ridge Office's Environmental Management Program, which has shown courtesy and flexibility in accommodating meeting schedules, and which we had hoped would be duplicated with Y-12. Moreover, citing other documents that have been in the public domain is irrelevant; the comment period is for the Y-12 Wetlands Assessment only. In addition, most Public Notices for NEPA documents available for comment include a statement that comments received after the deadline will be incorporated to the extent possible; it would have been appropriate for you to state this.

We hope that deadlines associated with future Y-12 documents will give sufficient time for stakeholder groups to read, evaluate, and prepare comments.

Sincerely,

Susan L. Gawarecki, PhD
Executive Director, Oak Ridge Reservation Local Oversight Committee, Inc.

cc: LOC Document Register
LOC Board
LOC CAP
John Owsley, Director, TDEC DOE-O
Pat Halsey, FFA Coordinator, DOE ORO EM
Ted Sherry, Manager, Y-12 Site Office, NNSA
John Michael Japp, DOE ORO, Y-12 Projects
Steven Wyatt, YSO Public Affairs
Amy Fitzgerald, City of Oak Ridge
Ron Murphree, Chair, ORSSAB
Spencer Gross, ORSSAB Staff
Mark Livesay, YSO Program and Business Management (electronic only)
Terri Slack, YSO General Attorney (electronic only)
Thomas Vereb, YSO Program and Business Management (electronic only)

Gilbert, Constance

Page 1 of 1

WD019

[redacted]

From: Constance Gilbert [connie@cyberhenge.com]
Sent: Tuesday, November 17, 2009 6:00 PM
To: DIV.Y12SWEIS.Comments
Subject: Form Post from Firefox

firstName=Constance
lastName=Gilbert
organization=
email=connie@cyberhemge.com
address1=226 Julia St
address2=
city=Key West
state=FL
zip=33040
country=
subject=Draft Y-12 SWEIS
1|10.B | comments=Please do not spend sorely needed dollars on another nuclear facility at this time. We cannot in good
2|1.E | faith ask allies (let alone adversaries) to reduce nuclear capabilities when we increase ours. Thank you.
rod=Record of decision

1

Gill, Eric

Page 1 of 1

WD115

[redacted]

From: Eric Gill [ericg14@me.com]
Sent: Friday, January 29, 2010 9:35 PM
To: DIV.Y12SWEIS.Comments

firstName=Eric
lastName=Gill
organization=
email=Nonprof1@chitogill.com
address1=2537 Crestmoore Place
address2=
city=Lo Angeles
state=Ca
zip=90065
country=USA
subject=Draft Y-12 SWEIS
1|14.0 |comments=The cold war is over. Enough with the bombs already.

-Eric Gill
eg design, los angeles ca
design, fabrication, management
http://ericgilldesign.com

1

Goff, Gary

Page 1 of 1

MD011

Roane State COMMUNITY COLLEGE

276 Patton Lane Harriman, TN 37748-5011
(865) 354-3000 Fax (865) 882-4562
www.roanestate.edu

November 12, 2009

Ms. Pam Gorman
Y-12 SWEIS Document Manager
Y-12 Site Office
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Dear Ms. Gorman,

1|13.0 I am writing you in support of the proposed Uranium Processing Facility (UPF) at the Y-12 National Security Complex in Oak Ridge. This facility will be another anchor to the modernization initiative currently underway at Y-12. The draft Site-Wide Environmental Impact Statement (EIS) presents this as the preferred option from several alternatives considered. This letter documents Roane State's full support of this preferred capability based option.

1|13.0 (cont) Roane State Community College has actively and directly participated in the development of a highly skilled workforce that has always been responsive to the safe conduct of the nuclear related operations associated with the Oak Ridge complex for more than 30 years. Roane State is prepared to continue to fully support the education and training needs and to continue to invest in regional workforce development that is required for support of the Oak Ridge complex. We

2|3.B do believe that Y-12's continued role in manufacturing and disassembling nuclear warhead components should be conducted in modernized facilities with cost effective and safety focused processes.

Thank you for your consideration of these comments. Please include them in the official record of this EIS.

Very respectfully,

Gary Goff, EdD
President

cc: Ted Sherry
Congressman John Duncan
Congressman Lincoln Davis
Congressman Zach Wamp
Senator Bob Corker
Senator Lamar Alexander

Serving the counties of
Roane ♦ Anderson ♦ Campbell ♦ Cumberland ♦ Fentress ♦ Loudon ♦ Morgan ♦ Scott
(Knox and Blount for Health Sciences)

Goin, Deborah

Page 1 of 1

WD042

[redacted]

From: Deb and Laz [debnlaz@att.net]
Sent: Wednesday, January 27, 2010 9:12 AM
To: DIV.Y12SWEIS.Comments
Subject: Attn Pat Gorman

1|9.C I am writing to let you know that there are so many people opposed to the new nuclear warhead facility proposed for Oak Ridge. It seems so senseless and irresponsible to spend billions on a facility which,by the time it is completed in 2018, will no longer be needed. The US stockpile of "life extended" warheads will exceed the maximum number allowed by the START treaty at that

2|10.D point. Also, 2,500 jobs would be lost in Oak Ridge with the new facility, since it would be largely automated. It is a no -win situation for our environment, health and job sector.

3|9.A I prefer the OREPA alternative 6.
Thank you for this consideration

Sincerely,
Deborah Goin
"If you think you're too small to make a difference, you've never been in bed with a mosquito."

_____ Information from ESET NOD32 Antivirus, version of virus signature database 4810 (20100127)
_____

The message was checked by ESET NOD32 Antivirus.

http://www.eset.com

1

Gordon, Gibson

Page 1 of 1

WD018

[redacted]

From: Gordon Gibson [gjgibson@juno.com]
Sent: Tuesday, January 26, 2010 4:19 PM
To: DIV.Y12SWEIS.Comments
Subject: Comments on Oak Ridge Y-12 plans

firstName=Gordon
lastName=Gibson
organization=
email=gjgibson@juno.com
address1=523 N. Bertrand St., Unit 201
address2=
city=Knoxville
state=TN
zip=37917
country=United States
subject=Draft Y-12 SWEIS
comments=I am a citizen whose residence is close enough to Y-12 to be affected by the safety and security of that facility and the safety and security of materials transported to and from that facility.

I follow broad issues on nuclear armaments by reading a number of journals, including Scientific American.

1|13.0 It seems clear that within the scope of current treaty obligations and strategic objectives of the United States the Alternatives outlined here that come closest to supporting the national interest would include Alternatives 4 and 5. I would also strongly urge positive attention to an "Alternative 6" put forward by the Oak Ridge Environmental Peace Alliance, which places more emphasis on the dismantlement of existing warheads, which is of pre-eminent importance in moving in directions enunciated by U. S. Presidents for many decades.

2|9.A

1

Gorenflo, Louise

Page 1 of 2

WD064

[redacted]

From: Louise Gorenflo [lgorenflo@gmail.com]
Sent: Wednesday, January 06, 2010 2:23 PM
To: DIV.Y12SWEIS.Comments
Subject: Comments y-12 SWEIS
Attachments: Comments.doc

Please see attached comments.

Your website does not appear to be accepting comments.

Please confirm you have received these comments.

Thank you.

1

Gorenflo, Louise

Page 2 of 2

WD064

Comments: Y-12-SWEIS
Louise Gorenflo
Cumberland Sustainable
185 Hood Drive
Crossville, TN 38555
lgorenflo@gmail.com

1|3.B The proposal by the National Nuclear Security Administration (NSSA) to build a new plant in Oak Ridge for producing nuclear bombs is far too expensive and poorly planned. The estimated cost is about $3 billion.

This cost should be reviewed in light of the fact that such a plant is not necessary for Y-12 to carry out its major missions of producing the thermonuclear units and cases for refurbished bombs, dismantling weapons, and safe storing or disposition of nuclear materials.

2|1.B This proposal reflects old, Cold War thinking. Most living former secretaries of State, leaders of the Defense department and national security advisers are calling for us to move away from relying on nuclear bombs for security. President George W. Bush ordered deep cuts in our bomb stockpile.

President Barack Obama has been clear that he is working toward a world without nuclear bombs. There is increasing international interest in this. When the plant is projected to be finished in 2018, the life-extended weapons we already have left in our stockpile will very likely meet our future needs. Does spending $3 billion for a production plant we probably won't need strike you as good planning?

3|12.H This also is not a jobs program. NNSA will cut about 2,600 Y-12 jobs when the proposed plant opens. They also project that no additional construction workers will be needed to build the plant beyond those in Oak Ridge now.

1|3.B (cont) Even NSSA recognizes that the current annual capacity of 125 new thermonuclear units and bomb cases is unnecessary. The new plant capacity is in the 50-80 range. But we actually need closer to five for maintaining our bomb stockpile safely. Even if we add another $100 million for longer-term modernization of Y-12, downsizing and consolidating existing facilities could be done at least 15-20 times cheaper than building the proposed plant.

Gramling, Nicholas

Page 1 of 1

WD054

[redacted]

From: Gramling, Nicholas (N3G) [gramlingn@y12.doe.gov]
Sent: Thursday, December 17, 2009 6:44 AM
To: DIV.Y12SWEIS.Comments
Subject: Y12 SWEIS Comments

Pam,

Please accept the following comments regarding UPF at Y12.

1|12.B As a subcontractor working on the UPF project I can admit that Continuing operations in existing facilities is not an option. I would also say that due to the condition of the existing facilities that upgrading the current facilities would be too costly and not a viable option as well. With that said UPF needs to be built but the capacity is the biggest problem. Currently I would say that Construction of a new UPF to replace enriched uranium processing facilities is not necessary. I believe that the technology has advanced to a point that an evaluation should be complete to access the currently used processes for a more efficient one. The main purpose I see in this is that a lot of floor space is currently require for the 1950's developed processes. I believe reducing the footprint is require including reducing capacity. Unfortunately from my experience I have noticed excess equipment and floor space with the typical answer of "we may need it later for future work" and "that is the way we have always done it". I believe that this is not correct methodology and therefore a Capability-Sized UPF alternative or better yet, a No Net Production/Capability-Sized UPF Alternative is 2|13.0 the best option. This would allow for research to be completed on advance technology that could possibly be utilized in the future at a location to be determined. These are my opinions and comments, sincerest Regards.

Nicholas Gramling
Mechanical Engineer
URS Washington Division
1099 Commerce Park Dr. Rm N21
Oak Ridge, TN 37830
865-241-0034
n3g@y12.doe.gov

1

Haber, Jim

Page 1 of 1

01/06/2010 17:31 7826464814 NEVADA DESERT E (WCP) PAGE 02/02

Nevada Desert Experience FD001

1420 West Bartlett Avenue
Las Vegas, NV 89106
702.646.4814
www.NevadaDesertExperience.org
Interfaith Resistance to Nuclear Weapons and War

Coordinating Committee
Ming Sun Lai, Chair
Sacramento, CA
Johnnie L. Bobb and Dr. Bonnie Bobb
Austin, NV
Alice Edmonston
Pleasant Hill, CA

National Council
Chelsea Collonge
Albuquerque, NM
JoAnn Yoon Fukumoto
Pearl City, HI
Bishop Thomas Gumbleton
Detroit, MI
Joe Kennedy
Dyer, NV
Marcus Page
Albuquerque, NM
Claudia Peterson
St. George, UT
Anne Symens-Bucher
Oakland, CA
Louis Vitale, OFM
Oakland, CA

Staff
Jim Haber
Coordinator
Megan Rice, SHCJ
Assistant
Gary Cavalieri
Bookkeeper

Pam Gorman
Y-12 SWEIS Document Manager
Y-12 Site Office
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

17 November 2009

This letter is sent from Las Vegas, NV where the Nevada Test Site is engaged in a scoping process for its updated SWEIS. In both cases, here and in Tennessee, it is alarming to see plans on the table that so clearly violate the spirit of nuclear non-proliferation and our nation's obligation to work towards nuclear disarmament. There is so much fear of weapons of mass destruction, but somehow, justifications abound for the building and retooling of the U.S. stockpiles of just such armaments. 1|1.E

For the Oak Ridge facility, Alternative 6 as proposed by the Oak Ridge Environmental Peace Alliance is the clear choice in keeping with a commitment to peace. This plan, which needs to be included in the SWEIS and fully given its due consideration, calls for a new dismantlement facility, but no new facilities for Life Extension Programs. 2|9.A

Anything that can be construed to be a new generation of nuclear weapons sends the wrong message to the world. There is no justification for building new Secondaries since the U.S. is supposed to be un-building the ones already in existence. Hence there is no possible rationalization to create an enlarged facility to create ever larger numbers of them. 3|1.D

Alternative 5 in the Y-12 SWEIS allows for capacity for construction of up to 10 new Secondaries a year. That is preferable over the alternatives 1 to 4, but why wouldn't any existing Secondaries that are deemed problematic simply be taken off line and ultimately dismantled? 4|8.0

As residents of Nevada in the neighborhood of the Nevada Test Site, we have also spoken out against new weapons designs because ultimately, with enough revisions, new tests will be necessary for deployment. The Comprehensive Test Ban Treaty should be ratified by Congress, and it must be seen to apply to the United States, not just everyone else, and not only to the current list of nations who's people we are told to fear. Therefore everything spent on new and redesigned nuclear weapons will be a waste and may undo progress in the international arena towards reducing the global threat of nuclear weapons. 3|1.D (cont) 5|1.B

Finally, any statement about the environment in the context of nuclear weapons (or nuclear power, for that matter) must at the outset acknowledge that any use or creation of this technology is harmful to people and the environment. Nothing can mitigate the problems of the nuclear fuel cycle from mining to waste management. Every step is part of an unsolvable environmental problem. Therefore, every facility's SWEIS needs to recommend the alternative that utilizes no new nuclear material. Anything else creates a worse problem that will last for millenia. 6|9.0

Respectfully submitted,

Jim Haber

Jim Haber
Coordinator, Nevada Desert Experience

Hagan, Gary

Page 1 of 2

OR2D04

Draft Y-12 Site-wide Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

NNSA National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010.

Dear Ms. Gorman.

Thank you for the opportunity to submit comments. I support Alternative 4.

I have listened to those who advocate unilateral disarmament, stockpile decay, and alternatives proposed by OREPA. Each of these are idealistic, extreme and dangerous to the nation, NNSA workforce and themselves. A viable nuclear deterrent has prevented global conflicts since their development and allowed our nation to be free. I support sensible stockpile reduction that is best supported by alternative 4 and careful disassembly. Our workers reducing the stockpile ~~Goes~~ best deserve safe facilities and modern tools. The citizens and taxpayers are served best by more efficient operations and eliminating the potential for future sick workers 1|7.0 2|3.B

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at
http://www.Y12sweis.com

Hagan, Gary

Page 2 of 2

Draft Y-12 Site-wide Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010.

My uncle, Bill McNair, was fighting his way across the Pacific when the workers at Y-12 saved his life. I know this because he told me. His twin brother was his wingman and killed in Action.

There remain evil and dangerous people in the world that require the strongest possible defense. I too wish this were not true.

3|13.0 Those who want to wish these materials from the modern world or believe the existing facilities can be brought up to modern standards simply lack information or advocate dangerous approaches.

I have worked in these facilities and designed and built upgrades in the 1980's UPF and the Complex Command Center are

1|7.0 (cont) necessary now. Please select Alternative 4

Gary Hagan 1513 Cranston Drive, Knoxville, TN 37922

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:
http://www.Y12sweis.com

Hale, Byron

Page 1 of 1

WD045

[redacted]

From: BHHHale@aol.com
Sent: Monday, November 30, 2009 2:04 PM
To: DIV.Y12SWEIS.Comments
Subject: Comments on Y12 National Security Somplex-Site-Wide Environmental

Sirs,

Here are my comments on Y-12 Ntional Secutity Complex Site-Wide Environmental Impact Statement Public Meeting.

1|13.0 I agree that this country must keep our national defence as the best in the world. I also agree with what I have seen in the Impact statement. But I do not have enough information to be able to decide on which method is best.

I feel the method chosen must be made based on the Economic Analysis of the systems presented. The cheapest methology must be used as far as I am concerned. But it should be at the Y-12 plant.

I spend 32 years in the Engineering Division and have helped in the design of the facilities that are presently in use. The people at this plant are the best in formulating methology that will do the job. This plant is much better than the other two. The people have one direction and that is to get the job done.

I was Project Manager for the development and completion of the Alpha 5 North complex. During the enhansement period of 1967. Jim Hodges was the Project Manager of the Beta 2 expansion at the same time. Both were highly sucessful and have led the United States to where we are today.

1| 13.0 (cont) I hope these comments are suitable and do not agree with those that are collectively against this project. We as a country must be strong and a leader of the world.

Thanks for the opportunity,

Byron H. Hale
308 Delta St.
Clinton, TN 37716
Ph 865 457 3609

1

Hanley, D. Bridget

Page 1 of 1

WD022

[redacted]

From: Bridget Hanley [bridgethanley@earthlink.net]
Sent: Tuesday, November 17, 2009 10:00 PM
To: DIV.Y12SWEIS.Comments
Subject: Form posted from Windows Internet Explorer.

firstName=D. Bridget
lastName=Hanley
organization=
email=b.hanley8@gmail.com
address1=11366 Camino Playa Cancun, #7
address2=
city=San Diego
state=CA
zip=92124
country=U.S.
subject=Draft Y-12 SWEIS
1|10.B comments=Please, please, please do not spend billions on building a new plant that will be producing more nuclear weapons. We have plenty already and they are very dangerous weapons.
Thank you for your consideration.

1

Hanrahan, Clare

Page 1 of 1

01/06/2010 13:59 FAX 18282326947 002

FD004

January 5, 2010

Pam Gorman
Y-12 SWEIS Document Manager
Y-12 Site Office
[illegible] Oak Ridge Turnpike, Suite A [illegible]
Oak Ridge, TN 37830
FAX: 865-483-2014

Ms. Gorman,

I trust by now you have heard from many many concerned citizens on this issue. Nuclear weapons are an insane remnant of the last century the use of such weapons is wrong dead wrong the impact on the environment ... on the system of inter connected life that we have a duty to preserve for our children and theirs - is devastating and dangerous in ways too numerous to list. The risk to us all in dollars and danger is too high.

1|14.0 Please register my emphatic, urgent NO to this 3.5 million dollar Bomb plant

We do not need an "enduring nuclear stockpile."

We need a future free of Nuclear Weapons.

Clare Hanrahan

1 of 1

Hardy, Parker

Page 1 of 1

OR1D06

Draft Y-12 Site-wide Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010.

Adopting of measures to modernize Y-12 site with Center for Uranium Excellence a UPF, along with a Complex Command Center will clearly enhance our national security, the safety & efficiency of our workforce & enhance our economy

I support the preferred action

Parker Hardy
123 Amanda Drive
Oak Ridge, TN 37830

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:
http://www.Y12sweis.com

Hardy, Parker

Page 1 of 1

WD099

[redacted]

From: Parker Hardy [hardy@orcc.org]
Sent: Friday, January 29, 2010 12:37 PM
To: DIV.Y12SWEIS.Comments
Subject: Y-12 SWEIS

The Oak Ridge Chamber of Commerce is 60-year-old association representing the interests of some 600 businesses, business-oriented institutions and individuals. Foremost among our missions is the enhancement of Oak Ridge's economic vitality. Our members employ literally thousands of Oak Ridgers and East Tennesseans.

1|13.0 Previously, and on numerous occasions and in many venues, the Oak Ridge Chamber has gone on record supporting NNSA measures that would modernize the Y-12 national Security Complex, transforming it into America's Center for Uranium Excellence through construction of UPF at Y-12. The 2008 Record of Decision is consistent with that Chamber policy.

2|7.0 The Oak Ridge Chamber fully supports Alternative 4 – and encourages adoption of – that alternative providing for a UPF of at least the capacity recommended by NNSA and construction of a new Complex Command Center.

Thank you for the opportunity to provide our input.

Parker Hardy, CCE
President/CEO
Oak Ridge Chamber of Commerce
1400 Oak Ridge Turnpike
Oak Ridge, TN 37830
T- (865) 483-1321
F - (865) 483-1678
hardy@orcc.org
www.oakridgechamber.org

1

Hargrove, Chris

Page 1 of 1

WD021

[redacted]

From: Chris Hargrove [hargrovefire368@charter.net]
Sent: Tuesday, November 17, 2009 7:01 PM
To: DIV.Y12SWEIS.Comments
Subject: Form posted from Windows Internet Explorer.

firstName=Christopher
lastName=Hargrove
organization=
email=hargrovefire368@charter.net
address1=2486 Topside Road
address2=
city=Louisville
state=TN
zip=37777
country=United States
subject=Draft Y-12 SWEIS
comments=Please do NOT build this new ruinous new weapons complex in Oak Ridge, TN.
1|14.0 Building such a plant could turn out to be the worst decision our country ever made, unleashing a new upward spiral in the arms race on an already dangerous world.

1

Haslam, Bill

Page 1 of 1

MD025

CITY OF KNOXVILLE
BILL HASLAM · MAYOR

December 7, 2009

Pam Gorman
Y-12 SWEIS Manager
Y-12 Site Office, 800 Oak Ridge Turnpike
Suite A-500
Oak Ridge, TN 37830

Dear Ms. Gorman:

I appreciate the opportunity to share our comments on the Draft Site-Wide Environmental Impact Statement (SWEIS), (DOE/EIS-0387) for the Y-12 National Security Complex in Oak Ridge, TN.

The Y-12 complex is very important to the entire region, including the City of Knoxville. The decision that Y-12 would continue its uranium processing in a new facility was key to the economic health of the region.

1|13.0 I fully support the construction of a new Complex Command Center that will provide emergency services to Y–12. The activities and Y-12 are key to the future of our country and we are very pleased to have them in the region. The planned modernization of the facility is especially welcome. The impact of Y-12, with it thousands of skilled employees, on the region cannot be overstated.

Thanks again for the opportunity to write on behalf of the Y-12 complex.

Sincerely,

Bill Haslam

CITY COUNTY BUILDING • ROOM 691 • 400 MAIN STREET • P.O. BOX 1631 • KNOXVILLE, TENNESSEE 37901
OFFICE: 865.215.2040 • FAX: 865.215.2085 • EMAIL: MAYOR@CITYOFKNOXVILLE.ORG
WWW.CITYOFKNOXVILLE.ORG

Heck, Anne

Page 1 of 1

WD086

[redacted]

From: Anne Heck [anne@anneheck.com]
Sent: Wednesday, January 27, 2010 10:48 AM
To: DIV.Y12SWEIS.Comments
Subject: Choose OREPA Alt. 6

Dear Ms. Gorman,

1|14.0 I'm writing with concern about the proposed nuclear bomb facility in Oak Ridge, Tennessee. I am a neighbor, living in Asheville, NC and am appalled not only by the billions of dollars of spending to be incurred by this project, but more importantly about how unnecessary and irresponsible building this facility is.

2|9.A I want my voice to be heard in support of OREPA alternative 6; please halt any plans toward the bomb facility.

Sincerely,

Anne Heck

Anne Heck
15 Arbor Ridge Trail
Asheville, NC 28806
www.anneheck.com
(828) 665-8316

1

Henderson, Leslie

Page 1 of 1

ROANE COUNTY TENNESSEE THE ROANE ALLIANCE Innovation Valley Partner

MD014

November 18, 2009

Ms. Pam Gorman
Y-12 SWEIS Document Manager
Y-12 Site Office
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Dear Ms. Gorman:

1|13.0 As the President and CEO of The Roane Alliance, the county's economic development organization, I am writing in support of the proposed Uranium Processing Facility (UPF) at the Y-12 National Security Complex in Oak Ridge. This facility will be another anchor to the modernization initiative currently underway at Y-12. The draft Site-Wide Environmental Impact Statement (EIS) presents this as the preferred option from several alternatives considered.

2|12.H The economic impact of the Oak Ridge DOE complex on our county and particularly our business community cannot be overstated, as major portions of the Oak Ridge DOE Complex, as well as the City of Oak Ridge, are located here. The impact of the Y-12 operations is a major factor in our local economy and they are a major employer as well.

1|13.0 (cont) Our county and region have always been strong supporters of the uranium processing and nuclear related missions of the Oak Ridge complex. Our region has invested in the development of a highly skilled workforce that has always been responsive to the safe conduct of the operations associated with these missions for more than 60 years. We at The Alliance are prepared to continue to fully support such missions and to continue to invest in regional workforce development that is required for these operations. We do believe that Y-12's continued role in manufacturing and disassembling nuclear warhead components should be conducted in modernized facilities with cost effective and safety focused processes. We think this preferred option of a new UPF achieves this objective.

3|3.B

Thank you for your consideration of these comments. Please include them in the official record of this EIS.

Sincerely,

Leslie Henderson
President/CEO

cc: Ted Sherry
Congressman John Duncan
Congressman Lincoln Davis
Congressman Zach Wamp
Senator Lamar Alexander
Senator Bob Corker
Roane County Executive Mike Farmer

INDUSTRIAL DEVELOPMENT BOARD CHAMBER OF COMMERCE VISITORS BUREAU

1209 N. Kentucky Street • Kingston Tennessee 37763 • Telephone: 865.376.2093 • Fax: 865.376.4978 • www.roanealliance.org

Hensley, Noble

Page 1 of 1

MD039

Draft Y-12 Site-wide
Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

NNSA
National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010.

1|13.0 I FULLY SUPPORT THE CONSTRUCTION AND OPERATION OF A NEW URANIUM PROCESSING FACILITY THAT WOULD HAVE A REDUCED CAPACITY WHILE MAINTAINING ALL ENRICHED URANIUM PROCESSING CAPABILITIES. IN ADDITION, I SUPPORT THE CONSTRUCTION OF A NEW COMPLEX COMMAND CENTER AT Y-12.

I FULLY SUPPORT THAT THE UPF & CCC BE DESIGNED, CONSTRUCTED AND OPERATED AT Y-12 PLANT, OAK RIDGE, TENNESSEE

BOTH FACILITIES SHOULD BE FULLY OPERATIONAL NO LATER THAN 2020.

NOBLE HENSLEY
N A Hensley, 1-28-10

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:
http://www.Y12sweis.com

Hickey, William

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MD067

January 11, 2010

Pam Gorman, Y-12 SWEIS Document Manager
Y-12 Site Office
800 Oak Ridge Turnpike
Suite A-500
Oak Ridge, TN 37830

Re New U.S. Nuclear Weapons

Dear Ms. Gorman:

While President Obama has called for abolition of nuclear weapons and initiatives to be taken by nuclear weapons countries and the final review of the nuclear Non Proliferation Treaty will convene in May 2010, there are other voices and actions that undermine these goals and processes.

1|9.c The US. Department of Energy announced plans for a new nuclear weapons bomb plant in Oak Ridge, TN that will cost 3.5 billion dollars. It will be a full-scale nuclear weapons production facility capable of producing 50-80 secondaries a year. The "secondary" is the thermonuclear part of the nuclear weapon which ignites the massive thermonuclear fusion reaction in the bomb. The Y-12 National Security complex has produced the secondary for every nuclear weapon in the U.S. arsenal.

2|9.a We can no longer tolerate further production of nuclear weapons. They are not simply bigger bombs, are not useable, and are the means of ending all human and animal life on the planet. New nuclear weapons and new nuclear weapons facilities should not be built. Rather, I support the Oak Ridge Environmental and Peace Alliance's (OREPA) Alternative #6, which advocates revamping the Y-12 facility to function primarily in *dismantling* nuclear weapons in negotiated verifiable steps with other nuclear weapons countries. Furthermore, our nuclear weapons policy should unequivocally renounce first strike use and abandon implicit threats of use against non-nuclear countries. We should end all actions that drive non-nuclear countries to seek nuclear weapons and begin finally to implement our obligations---long ignored---under the Nuclear Non Proliferation Treaty.

Sincerely,

William Hickey

William Hickey
20445 Briarcliff
Detroit, MI 48221
(313) 862-6962

Hogue, Gregory

Page 1 of 2

WD063

[redacted]

From: Stanley, Joyce A [Joyce_Stanley@ios.doi.gov]
Sent: Monday, January 04, 2010 10:38 AM
To: DIV.Y12SWEIS.Comments
Subject: Review of the Draft Site-Wide Environmental Impact Statement for the Y-12 National Security Complex - ER 09-1128
Attachments: Y-12 National Security Complex - ER 09-1128.doc

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Hogue, Gregory

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WD063

TAKE PRIDE IN AMERICA

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Richard B. Russell Federal Building
75 Spring Street, S.W.
Atlanta, Georgia 30303

ER 09/1128
9043.1

January 26, 2010

Ms. Pam Gorman
Y-12 SWEIS Document Manager
Y-12 Site Office
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Re: Review of the Draft Site-Wide Environmental Impact Statement for the Y-12 National Security Complex

Dear Ms. Gorman:

1|2.A The United States Department of the Interior (Department) has reviewed the Draft Site-Wide Environmental Impact Statement for the Y-12 National Security Complex. We do not have substantive comments at this time. I can be reached on (404) 331-4524 or by email at gregory_hogue@ios.doi.gov.

Sincerely,

Gregory Hogue
Regional Environmental Officer

cc:
Jerry Zciwitz, FWS – Region 4
Brenda Johnson, USGS – Reston
OEPC - WASH

Hough, Dennis

Page 1 of 1

MD053

Draft Y-12 Site-wide
Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

NNSA National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010.

I SUPPORT NNSA's PREFERRED ALTERNATIVE (PROPOSED ALTERNATIVE #4) BASED ON THE NATIONAL SECURITY ~~ISSUES~~ VULNERABILITIES THAT MAY ARISE IF WE (THE COUNTRY) LOSES ITS CAPABILITY, EXPERTISE, AND CAPACITY TO MAINTAIN A NUCLEAR ~~DETER~~ DETERRANT. THESE NEW FACILITIES AS PROPOSED IN ALTERNATIVE #2 AND #4 SUPPORT KEY NATIONAL SECURITY MISSIONS; MISSIONS WHICH ARE CRITICAL REGARDLESS OF OUR STANCE ON INCREASED NONPROLIFERATION. PLEASE ACCEPT TO THE RECORD MY SUPPORT FOR PROPOSED ALTERNATIVE #4.

1|7.0

Jenni C. Hough

DENNIS E. HOUGH

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

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Hubbard, Anne

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MD043

Draft Y-12 Site-wide
Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

NNSA National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010.

Pam

I am definitely in favor of constructing & operating a new UPF that would have a reduced capacity while maintaining all enriched Uranium processing capabilities. In addition I am in favor of constructing a new CCC.

1|13.0

Thank you!
Anne E. Hubbard

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

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http://www.Y12sweis.com

Hutchison, Ralph

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WD103

[redacted]

From: Ralph Hutchison [orep@earthlink.net]
Sent: Friday, January 29, 2010 2:52 PM
To: DIV.Y12SWEIS.Comments
Subject: supplement to OREPA comments
Attachments: Future of Y12.pdf

Attached find a pdf of The Future of Y12, supplement to OREPA's comments on the Y12 SWEIS

Ralph Hutchison, coordinator
Oak Ridge Environmental Peace Alliance

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Hutchison, Ralph

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WD103

The Future of Y12

An analysis of capacity and facility needs at the Y12 Nuclear Weapons Complex in Oak Ridge, TN in light of declining production needs and increasing demand for dismantlement.

In a satellite-video appearance at the 2001 Nuclear Decision-Makers Forum in Albuquerque, New Mexico, then-Senator Pete Domenici declared from the giant screen that facilities at the Y12 Nuclear Weapons Complex in Oak Ridge, Tennessee were in bad shape. Workers, Domenici said, had to wear hard hats in one building because chunks of concrete were falling from the ceiling. Later in the meeting, the President of BWXT-Y12, operating contractor for the Oak Ridge weapons plant, said Y12 was operating in "run-to-failure" mode.

Upgrading the Y12 facilities has been on the wish-list for the Department of Energy and the National Nuclear Security Administration for nearly two decades. Many of the uranium operations buildings at Y12 were constructed of hollow-clay tiles during the Manhattan Project days of the early 1940s. DOE's own Safety Survey in 1993 said critical facilities would not be expected to survive a design-basis earthquake or a tornado. The current modernization scenario at Y12 envisions consolidation of operations currently conducted in at least six separate buildings into one facility, reducing the security footprint.

Throughout the last two decades, a series of arguments have been put forward in support of a new Uranium facility at Y12. Some of these are:

- worker safety
- enhanced material accountability
- improved capability to withstand natural phenomena
- reduced security footprint/increased security
- efficiency of operations
- increased capacity for handling and storage of uranium
- reduced infrastructure and maintenance costs

Hutchison, Ralph

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- local economic benefit of $3.5 billion dollar construction project
- increased confidence in weapons production capacity
- increased capacity for dismantlement operations
- the prohibitive cost of upgrades to existing facilities

Many of these arguments are now being made in favor of the most recent modernization proposal, the Uranium Processing Facility (UPF). It is clear that a new facility would provide many of the benefits proponents advertise, but this does not automatically mean the UPF should be built. Other factors should be considered as well, such as:

- the impact of new bomb plant construction on nonproliferation efforts
- the actual need for secondary life extension upgrades into the distant future
- scheduled reductions in the US nuclear arsenal
- promises of further reductions in the US arsenal
- the risk of continuation of nuclear weapons production
- the outlay of $3.5 billion in a time of deep deficit spending
- cost comparison between consolidation in place with upgrades to old, down-sized facilities and new construction in light of financial realities and reduced capacity demands.
- job reductions due to innovations in robotics and automated manufacturing processes

WD103

11|10.B

12|10.C

1|1.E

FINDING: The arguments for the UPF have, almost without exception, been used for more than twenty years to justify weapons facilities in Oak Ridge. Changes in US policy, concern over nuclear proliferation, and global realities have created an environment in which the power of arguments for a new weapons production facility has eroded significantly.

The Work at Y12

The Y12 Nuclear Weapons Complex in Oak Ridge was built during the Manhattan Project to enrich uranium in the quest to build an atomic bomb. It was successful; the calutrons at Y12 produced the highly enriched uranium that fueled *Little Boy*, the bomb that destroyed Hiroshima, Japan. After the war, the United States turned to gaseous diffusion as its preferred enrichment technology, and Y12 carved out a new niche—it became the sole manufacturer of "secondaries," also known as "canned subassemblies (CSAs). The secondary is aptly named. The "physics package" in a nuclear warhead or bomb has two parts. The primary, a plutonium sphere with a tritium vial inserted, is a small atomic bomb that acts to trigger the secondary which produces a thermonuclear fusion explosion. The thermonuclear secondary consists of highly enriched uranium, lithium deuteride, depleted uranium, and other classified materials. Y12 has produced the thermonuclear secondary for every nuclear weapon in the US arsenal, more than 70,000 since 1949.

The dominant mission of Y12 today is the production of new and/or refurbished thermonuclear secondaries for existing US nuclear warheads as part of the Stockpile Life Extension Program. In 2009, Y12 is producing secondaries for the W76 warhead; NNSA says the life extension upgrades to the W76 will result in the W-76 Modification 1, a warhead with new military capabilities. Critics note this is essentially new weapons production "backdoored" through the life extension program. According to the 2008 Ten Year Site Plan, the demise of the Reliable Replacement Warhead program renders the W78 Life Extension Program more likely, but Congressional action does not support that assertion. Congress has dedicated money to studying modification of the B61 (producing Modification 12), but

an active Superfund site

One byproduct of weapons production activities in Oak Ridge has been pollution. Y12 put environmental concerns on the map in 1983 when it was disclosed that more than 2,000,000 pounds of toxic mercury had been "lost to the environment." The actual amount of mercury dispersed in the air and spilled into surface and groundwater has not been definitively determined, but it is known to be well in excess of the initial two million pound estimate. In addition, other contaminants (uranium, chromium, PCBs, nitrates) have been poured or spilled into ground and surface waters. East Fork Poplar Creek, which drains the east end of Bear Creek Valley, where Y12 is located, is posted to prevent contact with water. In November 1989, Y12, along with the rest of DOE's nuclear reservation in Oak Ridge, was added to the EPA's National Priorities List, making it the first DOE Superfund site among the major weapons production facilities. Unlike most Superfund sites, though, which are closed in order to enable rapid and thorough remediation, Y12 continues to operate. The continued operation of Y12 constrains cleanup operations and sets up a competition for funding between production and cleanup. Today, twenty years after Y12s listing on the NPL, the water draining the weapons plant is supplemented by the addition of millions of gallons of water from the Clinch River every day in order to dilute contamination released from legacy operations. Even with the addition of river water, in periods of heavy rainfall, Y12 releases mercury into East Fork Poplar Creek in excess of EPA and state standards for chronic exposure to biota.

Hutchison, Ralph

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has limited the study to non-nuclear upgrades to the B61.

Y12 has other missions: production of joint test assemblies for Lawrence Livermore and Los Alamos National Labs (JTAs are blanks—non nuclear warhead packages for testing and analysis), dismantlement of retired warhead secondaries, storage of enriched uranium in safeguarded facilities, preparing excess highly enriched uranium for downblending, supplying special nuclear materials for the nuclear navy, promoting nonproliferation internationally, and a catch-all "work for others" category that refers mostly to work for other federal agencies, including non-nuclear projects for the Department of Defense. The work is carried out by B&W Y12, operating contractor for the weapons plant. Wackenhut provides security for Y12. In addition, Bechtel Jacobs manages the contract for cleanup of a myriad of contaminated sites at Y12.

WD103

Money is the main driver for missions at Y12. "There is no driver for dismantlement work at this time," said William Brumley when he was site manager at Y12. When asked what that meant, Brumley extended his hand and rubbed his thumb in a circular motion across the tips of his index and middle fingers. In recent years, the money that drove the mission at Y12 has been dedicated to the Life Extension Program and the construction of a new uranium storage facility, due to come on-line in 2011.

2|10.A

FINDING: The mission of Y12 has always been to serve the national interest as determined by nuclear policy and decision-makers from outside the community. Work at Y12 has been prioritized by the availability of funds appropriated by Congress. As a result, production activities compete for resources with dismantlement, disassembly, disposition, technology development, environmental restoration and other programs.

Defense Programs Facilities at Y12

The Y12 Nuclear Weapons complex occupies 811 acres in Bear Creek Valley; 630 aces are fenced. In 2001, DOE/NNSA reported more than 7 million square feet in 390 buildings were in use at Y12, with Defense Programs—weapons production/dismantlement/storage—claiming 5.3 million square feet. (TYP07, p.3) The work takes place in several clusters of buildings identified by the number of the main building. Just under half of the floor space currently used by Y12 NNSA predates 1950. (TYP07, p.8).

The Building 9212 Complex includes buildings 9212, 9818, 9815, 9980, and 9981. Building 9212 (100,000 sq ft) was built in the 1940s. DOE says "Over 100 operations or processes have been or are capable of being performed within the Building 9212 Complex." (2001 Y12 SWEIS, Vol 1, p.4-65) These processes include casting of HEU metal for weapons, quality evaluations of metal, recovery and processing of HEU for storage, reuse or future disposition (downblending), packaging of HEU for off-site shipment, support for International Atomic Energy Agency sampling of surplus HEU, preparation of special uranium compounds for research reactor fuel. The two major processing areas are the Chemical Recovery Operations and Metallurgical Operations.

The 9215 Complex includes Building 9215 (127,000 sq ft) and Building 9998 (24,000 sq ft); the two are physically attached at one corner; both were built in the 1940s and have been modified and expanded since. The 9215 Complex aids in dismantlement work, provides for storage and handling of HEU inventories, fabricates metal shapes as needed for stockpile maintenance, and supports other nuclear programs at US and foreign facilities. Both 9215 and 9998 appear on maps to be contiguous with 9212.

Next door to 9215, building 9204-2E (three stories, 68 ft high, 151,200 sq ft; reinforced concrete, clay tile, concrete block with brick veneer) was built in 1971 to house weapons assemblies. Current operations include: assembly of new or replacement weapons, quality certification of components and assemblies, disassembly of retired weapons assemblies, and storage of retired assemblies, subassemblies and components. The building has five vault-type rooms and one vault in addition to production operations. Building 9204-2 (270,000 sq ft) houses lithium operations. These buildings have dry room facilities [9402-2 has three dry rooms; 9204-2E has one large, 2,500 sq ft dry room with several workstations; the dry rooms have hoists for moving materials (SAR, p.65)] that operate in super-dry conditions; weapons components are fabricated and installed in canned subassemblies in these buildings (SAR 1984, p.11). The 1984 Final Safety Analysis Report lists Building 9204-4 as a disassembly facility; the 2009-2018 Ten Year Site Plan lists building 9204-4 as "not required to support Y12 mission requirements." Buildings 9204-2 and 9204-2E are equipped with lift equipment, including hoists that run on monorails over equipment and, in Bldg 9204-2E bridge cranes (5-ton and 9-ton) in assembly bays. The 1984 Final Safety Analysis Report for Y12 finds Bldg 9204-2E is at risk of collapse in seismic event or 75 mph winds.

To the west of the production and dismantlement operations buildings are two other mission critical buildings: Building 9720-12 is a warehouse that stores materials that have been removed from higher security buildings in the Material Access Area. Building 9720-5 is used for storage of weapons materials and assemblies. Built in the 1940s it has since been renovated.

Building 9995 is the Analytical Chemistry Lab, constructed in 1952 and located in the high security area. It provides services for weapons production and work-for-others programs. Built in 1952 it has been expanded twice and has had some modifications. Of 150 chemical fuming hoods, approximately 20 were replaced in the mid-1980s;

Hutchison, Ralph

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other units have been replaced at times, but most are original equipment.

Building 9201-5W is a depleted uranium machine shop and also houses offices. Building 9201-5N houses electroplating processes and depleted uranium machining. It houses a vertical turret lathe and is serviced by a 15-ton bridge crane. It is included in a list (SAR, 1984) as a weapons assembly facility. A cyanide treatment facility has operated in Building 9201-5N; in 2001 it was inactive.

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FINDINGS: The buildings in which Y12 does its work were built as needed over a span of decades; maintenance has been constrained by funding. As a result many of the mission critical facilities are in various stages of disrepair. Currently, an aggressive program to reduce the footprint of Y12 through decommissioning and demolition of facilities no longer required is realizing cost savings.

Seismic and other structural integrity concerns about several buildings, especially 9204-2E should be addressed in any future scenario.

4|12.M.1

Adequacy of Current Facilities

The March 2007, Y12 Ten Year site plan says "significant investment is required to consolidate Y12's enriched uranium operations, maintain or upgrade site infrastructure, and meet the current design basis threat." (TYP07, p.1). The 10-Year Plan lists the following critical capabilities for Y12:

- modification, replacement or repair of secondaries (Ur and Lithium components)
- production of hardware for labs to support testing for certification (JTAs, expected to reduce in 2010 and level off; the NNSA decides the schedule for production of JTAs, TYP07, p. 31)
- surveillance of weapons through disassembly and inspection
- dismantlement, storage and disposition of weapons and materials returned from stockpile (disassembly, dismantlement of various bomb and warhead secondaries; 21 types according to TYP07, p. 31)
- packaging of materials/components for shipment
- management and secure storage of materials and strategic assets
- supply special nuclear materials for naval reactors
- processing of weapons materials—including chemical recovery, purification and conversion to a storage/disposition/reuse-suitable form
- support other Homeland Security programs (TYP07, p.2)

One year later, the 2008 Ten Year Plan said the following gaps exist for mission critical operations pending an estimated 2018 or later completion of the UPF:

> ensuring that mission critical facilities, infrastructure and equipment can bridge the gap to new, modernized facilities

> upgrade and modernization of utilities infrastructure system

The NNSA does not argue that a new Uranium Processing Facility is necessary to meet mission requirements—the work Y12 is expected to perform is currently being done and will continue to be done for ten years in current facilities. If, in fact, the 2007 TYP is correct in identifying that Y12 falls short of meeting the "design basis threat," this serious deficiency should be addressed immediately. If the security of weapons components and special nuclear materials is not currently compromised at Y12, the language of the 2007 TYP is deceptive and should not be used to justify new construction. Given the absolute necessity of protecting nuclear weapons components and special nuclear materials from design basis threats, it is likely the language of the 2007 TYP at the very least exaggerates any possible security shortfall.

3|3.B

FINDING: Critical mission requirements are not the driver behind UPF.

The 2007 Ten Year Plan (p.61) says other factors drive modernization considerations, including the need for seismic upgrades, enhanced security, and projected environmental, safety and health requirements which are not detailed.

Cost of Modernization: New Facility v. Consolidate/Upgrade-In-Place

The Y12 Ten Year Site Plan, March 2009-18, says seismic, ventilation and other upgrades estimated at $80 million to Building 9212 will be required to keep the building operating safely until the UPF is built. ($100 million in FIRP funding minus $20 million in deferred maintenance saved; TYP09, p.19) This number corresponds roughly to a 2007 table indexing current facilities (TYP07, p.61) which says total NNSA mission critical building

Hutchison, Ralph

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deferred maintenance cost is $121,528,000.

The Ten Year Plan provides no comprehensive overview of what the upgrades will cover, or how long the renovated 9212 complex could function safely, but at $80 million, it seems likely the renovations would be substantial and provide ES&H assurances beyond 2018.

Reduction of the footprint of operations enhances security and reduces security costs, relieves some deferred maintenance costs, and could increase regulatory pressure on Y12 to address legacy contamination issues. Under the best-case scenarios outlined in the Y12 Ten Year Plan, the Y12 mission requirements can be accomplished with 2.5-3 million sq ft. (TYP07, p.3)

The Y12 Building and Location map shows most weapons assembly and dismantlement operations occupy a small footprint within the PIDA high security area. With the retirement of 9204-4, the relocation of warehoused weapons materials and assemblies from Building 9720-12 could conceivably reduce the high security footprint by 1/3; relocating the outlying 9201-5N (assembly and DU machining), 9201-5W (DU machine shop) and 9720-5 (weapons storage) would result in a further reduction; the high security footprint could occupy one half its current space. Security cost savings under a consolidate-in-place scenario could approach NNSA's estimated security savings for a new UPF.

WD103

According to Y12's Ten Year Plan, accelerating dismantlement operations will further reduce the need for high security storage facilities for special nuclear materials (highly enriched uranium).

5|9.A

FINDING: A combined program to consolidate operations and upgrade current facilities sufficient to maintain manufacturing and production capacity for the foreseeable future could be accomplished at dramatic savings compared to construction of a new facility.

Infrastructure and ES&H driven upgrades to current facilities to "bridge the gap" to a new UPF will not "expire" in 2018 but could be expected to render facilities functional for at least another decade, during which the future of US nuclear force needs would become much clearer. With a pricetag of $3.5 billion, building a new UPF would cost 43 times as much as a consolidate/upgrade in place scenario.

The Need for Production Capability in the Long Term

The future need for production operations at Y12 is uncertain. In April, 2009 President Barack Obama announced a firm commitment to a world free of nuclear weapons; three months later President Obama announced an agreement to reduce the US strategic arsenal to a maximum of 1,695 warheads, pledging efforts to pursue further deep cuts in the renewal of the START Treaty which expires in December 2009.

In keeping with this commitment, the Obama Administration submitted a budget to Congress which include bare bones funding for design of the new UPF; Congress nearly doubled the funding in passing the 2010 budget.

There are many brushes trying to put paint on the picture of the future of nuclear weapons policy in the US. The Nuclear Posture Review, which will recommend force structure requirements to the President, is being prepared by the Pentagon, and early reports indicate it envisions a future with an enduring nuclear arsenal, possibly including new weapon design and production. But powerful voices, led by Henry Kissinger, George Shultz, Sam Nunn and William Perry, have called for the US to move in a new direction. They have been joined, says Shultz, by 3/4ths of all living Secretaries of State, Secretaries of Defense, and National Security Advisers. In an article in Yale Divinity School publication, *Reflections*, Shultz wrote: "We are at a tipping point. The simple continuation of present practice with regard to nuclear weapons is leading in the wrong direction. We need to change direction."

As a result, it is not completely clear what the mission of Y12 will be in ten or twenty years. But we do know some things:

- We know that dismantlement and disassembly operations will be required to meet arms control agreements
- We know that safe and secure storage of weapons assemblies and special nuclear material will be a priority
- We know that some surveillance of current warheads will be required to meet safety and security requirements
- We know that NNSA has determined that Highly Enriched Uranium operations will be carried out at Y12 and not at another site
- We know there are no current plans or funding for new weapon designs
- We know Life Extension regimes beyond the W76 are uncertain
- We know that the US nuclear stockpile will be further reduced from its present status

In the uncertain but expected category:

- We can expect that the stockpile ceiling of 1,695 warheads announced by President Obama in June, 2009, will continue to be lowered as arms negotiations move forward—Obama himself called the June announcement a "first step" toward deeper cuts and

Hutchison, Ralph

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pushed for multilateral arms control efforts in the UN Security Council resolution presented by the US and passed by the Council in September 2009.

• We can expect pressures for further deep reductions will be growing, not only from the international community, but also from influential US advisers whose analysis persuades them an enduring nuclear arsenal undermines US security and nonproliferation goals. WD103

The picture of US nuclear policy that begins to emerge is not clear, but it offers guidance as one considers what is reasonable to project for the future at Y12. It also raises significant questions for Y12. We know that dismantlement, disassembly, storage and disposition facilities will be increasingly important. And we expect production operations will be of declining importance.

6|1.A.1

FINDING: Any statement of "need" for new production facilities should be predicated on the expectation that demand for production capacity will decline to near zero over the next forty years, while demand for dismantlement/disposition capacity will increase.

Production v. Dismantlement

In the context of US nonproliferation goals, considering protocols for safeguarding of weapons components and materials and verification of agreements, an important question arises: should production and dismantlement operations coexist in a dual use facility?

The description of current operations at Y12 indicates no requirement for co-habitation between the programs. "Machining operations for dismantlement operations differ considerably from product fabrication requirements. Technology such as lasers or chipless cutter techniques may be applied to the relatively low accuracy and high throughput needs of dismantlement." (TYP07, p.42.) Recent news reports indicate that other processes—the use of infrared to melt adhesives—are unique to dismantlement/disassembly and have no application in production activities. The 1984 SAR indicates production and disassembly operations take place in separate facilities and use dedicated equipment: "Specially designed equipment and carefully controlled procedures are used." (SAR, p.230)

Production operations include metal processing, fabrication, and assembly operations. Some of these are unique to nuclear weapons manufacturing, but others are not. Many current (c. 2007) processes mimic those used in commercial applications for common metals and alloys. Enriched uranium is more specialized and low-volume. (TYP07, p.42)

Y12's wish list for the new UPF includes new technologies for higher processing yields and better control of chemistry: microwave processing, radiant heating, flexible pressing, and purification that minimizes chemical processing. (TYP07, p.42) Another wish is for the Agile Machine Tool to combine lathes and mills on one platform. (TYP07, p.21) There is no indication that new technologies are necessary as Y12 pursues its current Life Extension mission, nor is it clear that new technologies are a reasonable investment if the future portends further deep cuts in the US arsenal.

Modernization—the UPF— would streamline production operations, shifting from small-lot, batch mode operations (TYP07, p.42) to enclosed, automated operations. NNSA says the shift would provide environmental, safety and health benefits—the benefits are not enumerated, nor is it clear how necessary they are; no cost-benefit analysis is provided to document the claim. According to NNSA, the shift to automated operations would nearly halve the Y12 workforce.

Production/assembly operations take place in several buildings which are designed to accommodate the distinctive requirements of the mission. Dry rooms in Bldgs 9204-2 and 9204-2E have large viewing windows that allow for monitoring of the work taking place inside. Descriptions of the workflow indicate that a worker in a sealed suit (to control moisture) assembles weapons assembly parts, welding large aluminum, steel, magnesium and depleted uranium parts (and one deleted material, SAR p.123) with remote-operated electron-beam welders, and bonding others with adhesive materials (SAR, p.111); a second worker, outside the dry room, tracks and records the activities inside. In Bldg 9204-2E, a metallic inert gas welder (used to weld Beryllium parts? SAR p.66) operated through glove ports is also available; this building also apparently houses a CO_2 laser welder to weld thin stainless steel parts under an argon/helium cover gas. Activities in the dry rooms include assembly of CSAs and "disassembly for rework." (SAR, p. 89) Rework apparently refers to subassemblies which fail the leak test performed after assembly is completed. (SAR, p.94)

Bldg 9204-2E houses a heated pneumatic press, the hazardous materials weld finishing booth, and other process that are classified.

Certification (nondestructive testing) includes measuring contours, optical comparison, ultrasonic tests, dimensional inspection, etc (SAR, p. 111). It takes place in a 3,400 sq ft area on the second floor of Bldg 9204-2E.

The 2007 Ten Year Site Plan expects many of the current production processes will be improved or eliminated by new technology developments. If this is the case, prudence would suggest upgrading current operations in place where required to fill the gap and

Hutchison, Ralph

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investing in new technology development (currently 2% of Y12's budget) rather than building a new facility and stocking it with equipment that may well be obsolete before it is put into service. (TYP07, p.12)

As surely as production requirements are declining, the demand for dismantlement, disassembly, storage and staging for disposition will increase.

Dismantlement primarily takes place in dedicated facilities. Subassemblies are moved from Building 9720-5 and slated for reclamation or disposal. Subassemblies slated for reclamation are disassembled, their parts assayed, and then dispatched for recycling or salvage. Subassemblies slated for disposal travel through the quality evaluation lab. The outer casing is removed in a dry room and the unit is leak-tested. A valve is installed to take a gas sample for measurement, and the unit is disassembled in an inert glove box.

The Quality Evaluation Lab is a dual use facility used to service retired weapons and production line weapons (SAR p. 155). It is a 15,000 sq ft, large, open room and contains two 10-ton overhead crane bridges, each with two 2-ton hoists which can be used over entire area. Facilities and equipment include: Moisture Outgas Monitoring facility measures hydrogen balance of weapons units (SAR, p.156); Inert Atmosphere Glove Box: used for disassembly under controlled conditions (SAR, p. 156); Vertical Turret Lathe – vertical boring and milling of DU and nonU metal, also used for the first disassembly cut on outside case of weapons assemblies, cooled with 50% freon, 50% oil; Enriched Uranium Lathe for disassembly cuts on EU parts (freon coolant in enclosed hood); No enriched lathe, 60 inch center lathe, to make disassembly cuts on DU and other materials. (nonrecirculating freon, as of 1984) used as coolant. (SAR, p. 162) ; Disassembly booth: 8 sq ft. floor covered with paper to collect corrosion particles that fall to the floor during disassembly, booth uses a 500 lb hoist. (SAR, p. 164). Disassembly also takes place on "Surface Plates" with hand tools. A hydraulic press is used to deform classified weapons shapes (SAR p. 184). WD103

While current information is limited, with the exception of some quality evaluation lab processes which are used retired and production line weapons (SAR, p.155), production operations and the facilities which accommodate them do not appear to overlap significantly with requirements for dismantlement operations.

Finally, the operating contractor of Y12, B&W Y12, sets out a vision of "multipurpose facilities" which will support an ever-changing future with respect to nuclear weapons and the need to seek growth in complementary work and support any new missions." (TYP07, p.15) At the same time, the NNSA proposes a $3 billion investment in the UPF as a dedicated, single-purpose, high security/limited access facility.

FINDING: Except for Building 9204-2E (a relatively small assembly and disassembly facility), production and dismantlement operations operate independent of each other, in separate facilities. Quality evaluation equipment and lab facilities used for surveillance activities are an area where production and disassembly operations overlap. (SAR, p.155)

The Future of the Life Extension Program

The United States is not manufacturing new, from-the-ground-up nuclear weapons. The mission of Y12 today is to support the current stockpile by performing Life Extension Upgrades on existing warheads. The Stockpile Life Extension Program refurbishes old warheads to extend their reliable shelf-life for decades. Estimates of the reliable life of a refurbished warhead range from 40 years (the official DOE number) to 120 years (the number cited by Y12 Site Manager Robert Dempsey in 1998).

What manufacturing capabilities does the US needs to maintain a safe and reliable stockpile pending further deep cuts in the nuclear arsenal?

The current active US strategic nuclear stockpile is not terribly old by nuclear weapons standards where weapons were designed with an expected shelf-life* of 40 years. The oldest active weapons in the US stockpile (excluding those scheduled for deactivation by the Moscow SORT Treaty) are 100 W80 cruise missile warheads produced in 1981, followed by 320 B83 bombs built in 1983—26 years old as of 2009.

Four hundred W88/Mark 5 Trident missiles were manufactured beginning in 1988; they are reaching the halfway point of their reliable shelf-life. Two hundred six B61/Modification 10 strategic bombs were produced starting in 1990, but they are not in the active stockpile. More recently, 20 B61/Modification 11 bombs were produced in 1997.

Since then, the Stockpile Life Extension program has been refurbishing aging warheads to give them a new lease on death. More than 300 W87 warheads were refurbished (completed in 20--), and more than 2000 W76 warheads are scheduled for LEPs; the first was completed in 2008. A study of LEP/Modification of the B61 has been funded by Congress (the result would be the B61-Mod 12).

The bottom line is this: the United States has more than 1,000 warheads/bombs that are of relatively recent origin and, over the next ten years, could triple that number if currently scheduled LEPs are completed. The weapons include cruise missiles, Trident missiles, and bombs, providing the US with a triad of defensive options.

What does this mean for manufacturing capabilities at Y12?

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Given the current US arsenal, according to NNSA estimates, $100-120 million of upgrades will keep Y12 operational until 2018, at which time the US will have "Life Extended" warheads in excess of the numbers President Obama declared in June as the "first step" in arms reductions.

[*There is no specific reliability boundary; there is no physical reason weapons would be reliable one day and suddenly unreliable the next—remaining life is an estimate; the warheads would likely remain fully operational for a much longer time. To date, the NNSA has made no documentation of warhead degradation over time publicly available; previous NNSA claims of plutonium pit deterioration due to aging were shown to be false in an independent study by the JASON.]

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7|9.D

FINDING: As LEP work at Y12 increases the number of refurbished, Life Extended warheads in the US arsenal, arms control agreements are decreasing the size of the US nuclear stockpile. At some point in the near future, those two numbers will meet. The "need" for Y12's production operations will vanish, at least for several decades.

At the same time, arms reduction agreements will increase the need for dismantlement, disassembly, storage and disposition capacity at Y12.

Proposals for new facilities for Y12 should reflect this shift in mission emphasis and priorities in the future.

The Nature and Purpose of New Facilities at Y12

Future weapons activities in the United States are likely to be subject to international verification and safeguard protocols as a consequence of arms control agreements and Nonproliferation Treaty compliance. The United States is pushing for such protocols to be enforced against other nations, and it is clear such a policy is only tenable if the US submits its operations to the same inspection regimes.

The Ten Year Plan suggests Y12 foresees a transparent future: The Transparency Technology Demonstration Complex in Bldg 9203 is a user facility to demonstrate technologies for inspection/verification in support of arms control agreements.

Forward-looking planning for the Y12 of the future must ask: What are the requirements, physical or otherwise, for IAEA certification of treaty compliance? What challenges does a production/dual use facility present that would be avoided if separate facilities were designed for dismantlement and production activities? What are the cost comparisons of the possible permutations—upgrading aging production facilities (assuming a limited-life requirement for the facilities) and constructing a new dedicated facility for dismantlement operations? What design features of any new facilities or upgrades to old facilities will accommodate inspection and verification requirements?

And a question which will grow more important over the next several years must also be asked: What level of dual-use facilities would the US find acceptable in North Korea or other nations?

8|3.B

FINDING: As long as Y12 is responsible for weapons components and special nuclear material, safeguards are of paramount importance. In the nuclear weapons complex of the future, international inspections and verification will be of growing importance; incorporating such needs into the design of any new facilities is prudent and, in the long run, will prove to be cost-effective.

Future Economic Impact of Y12 in Oak Ridge/East Tennessee

The economic impact of operations at Y12 is primarily measured in the number of workers employed. Job projections over the next 15 years look different to different sectors of the workforce, but in the end they are similarly bleak.

Building a new UPF or a new dismantlement facility would not result in a surge of construction jobs but would maintain the construction workforce (about 1,000 jobs) currently building the HEU storage facility at Y12. NNSA has not provided an estimate of how many jobs would be created during an upgrade-in-place scenario if the UPF were not built, so there is insufficient information to compare workforce requirements.

Under modernized/UPF scenario, the Defense Programs workforce would be reduced to 2,000-2,500 from 4,500(TYP07, p.3) If the UPF were not built, it could be expected that an upgrade-in-place scenario would include some modernization of equipment technology resulting in the loss of some jobs. In either scenario, a significantly reduced footprint would reduce security requirements—the UPF scenario would more dramatically reduce the guard force at Y12.

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9|12.H

FINDING: The future of Y12 shows a sharp decline in jobs for weapons production activities. Depending on the amount of automation incorporated into new or upgraded facilities, an increase in dismantlement operations should result in a steady or slightly diminished workforce requirement.

Security at Y12

Pending construction of new facilities, or major renovation of current facilities, "much of the workload during the next 5-10 years will be accomplished in many of Y12's existing Mission Critical facilities. Accordingly investments will be based on the risk in meeting mission commitments and on ES&H and security requirements, balanced with the need to implement Complex 2030 facility and infrastructure improvements." (TYP07, p. 3)

Increasing security assurances is a benefit of modernization, according to NNSA. The UPF would be a "designed denial facility" (TYP07, xii.) The NNSA does not discuss security operations, so it is not clear in what ways (if at all) a "designed denial facility" would offer qualitative improvements in material, facility or worker security. It is also not clear whether similar "design denial" objectives could be achieved (and at what cost) in a reduced-footprint, consolidated, upgrade-in-place scenario. For obvious reasons, Y12 admits no security vulnerabilities as it is currently configured and operating.

10|11.A

FINDING: While it is difficult to assess security needs and requirements because of information classification, the reduction of an overall security footprint should result in higher security whether achieved through a new facility or a consolidation/upgrade-in-place scenario.

Sources

TYP07 refers to the Y12 Ten Year Plan issued in March 2007
TYP09 refers to the Y12 Ten Year Plan issued in March 2008
SAR refers to the 1984 Safety Analysis Report
DOE 1993 Safety Survey
Y12 Site Wide Environmental Impact Statement, prepared in 2001.
Draft Y12 Site Wide Environmental Impact Statement, 2009

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[redacted]

From: Ralph Hutchison [orep@earthlink.net]
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Comments of
the Oak Ridge Environmental Peace Alliance on the Draft Site-Wide Environmental Impact Statement for the Y12 National Security Complex Oak Ridge, Tennessee

On October 29, the National Nuclear Security Administration released the Draft Site-Wide Environmental Impact Statement for the Y12 National Security Complex in Oak Ridge, Tennessee (DOE/EIS-0387).

1|2.F The purpose of the Y12 SWEIS is to update the 2002 Y12 Site-Wide Environmental Impact Statement. The Department of Energy's NEPA regulations which require SW-EISes also require a Supplemental Analysis every five years in order to determine whether a new SW-EIS should be prepared. In this instance, DOE did not wait five years to begin preparing a new SW-EIS—three years after the Record of Decision which issued from the first SW-EIS, on November 25, 2005, NNSA announced its intent to prepare a second SW-EIS. This decision was not based on a Supplemental Analysis as required by NEPA regulations, but was driven by the desire to move forward with construction of the Uranium Processing Facility, a decision which NNSA declared not yet "ripe for consideration" in the initial SW-EIS.

It is clear from DOE'S NEPA regulations that SW-EISes are intended to look at least five years down the road. During preparation of the original Y12 SWEIS, the Oak Ridge Environmental Peace Alliance suggested DOE/NNSA was segmenting its NEPA analysis in order to minimize the overall impact of planned construction of facilities.
DOE/NNSA dismissed OREPA's concerns.

The 2002 Y12 SWEIS focused on two facilities which were, at the time, declared critical to meeting mission requirements. The Record of Decision for the 2002 SWEIS announced DOE would construct two new facilities: the Highly Enriched Uranium Materials Facility and the Special Materials Complex. The HEUMF was subsequently built; the SMC was dramatically downsized due to "changing mission requirements."

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This is the context for the current Y12 SWEIS and OREPA's comments.

The Y12 SWEIS is supposed to undertake a comprehensive presentation and analysis of ongoing and future operations, activities and facilities at Y12. The purpose of a SWEIS, rather than a simpler EIS on the Uranium Processing Facility, is to take a more comprehensive look—to place proposed actions in the broader context. The Draft Y12 SWEIS [from this point forward, SWEIS, Y12 SWEIS, Draft, Draft SWEIS, and Draft Y12 SWEIS will refer to the October 2009 Draft Y12 SWEIS] fails to provide such analysis and evaluation, describing instead two proposed new construction projects:

1|2.F (cont)
1. facility(s) required to meet Uranium production mission requirements (five alternatives are considered, including three sizes of a new Uranium Processing Facility)
2. a new command post for security and emergency response operations (the Complex Command Center).

2|2.G.1 The SWEIS includes a vague assurance that the location for the new CCC will be chosen to avoid CERCLA issues. The description of the new facility contains no evaluation or analysis of environmental impacts associated with the CCC, despite its seven acre footprint. The vague assurance provided in the SWEIS Summary is insufficient to meet NEPA requirements for a Categorical Exclusion let alone an Environmental Impact Statement. Since NNSA has determined the CCC is covered by this SWEIS, a more thorough environmental analysis must be prepared.
It must include consideration of locations (outside the security zone v. proximity for emergency response), impact on remediation activities, an assessment of vulnerabilities associated with a consolidated center, and a complete accounting of costs over the lifetime of the facility. Other reasonable alternatives must be considered, including a No Action alternative. In today's economic climate—with a proposed three-year freeze on much federal spending and major sectors of the government being asked to endure sacrifices and reductions, NNSA must show the benefits of the CCC justify the considerable expense of this elective project; it is not enough to declare up-front savings through a privatization scheme. The CCC may be a wise expenditure of public money, and the proposed location may be ideal; given the absence of information in the SWEIS, there is simply no way to tell. The public should be able to look at real plans and numbers to determine whether the CCC is a valid, justifiable expense or a Security Taj Mahal and to comment before a Record of Decision is announced.

The vast majority of the content of the SWEIS is devoted to the
facility(s) required to meet the Uranium handling, processing and production mission requirements, including an analysis of five "reasonable" alternatives: No Action [hereinafter NA or No Action]; Upgrade-In-Place [hereinafter Upgrade]; a new Uranium Processing Facility with a throughput production capacity of 125 warheads/year [UPF125]; the "Capability-Sized UPF" with a production capacity range of 50-80 warheads/year [UPF80]; and the "No Net Production UPF, with a production capacity of 5 warheads/year [UPF5].

Initial comment on the presentation of Alternatives

3|2.G.2 The distinction between No Action, which includes a list of upgrades, maintenance and replacement activities already self-approved by NNSA, and Upgrade-in-Place is not clear from the analysis provided. Any assessment meant to inform a decision would have to include costs; none are provided, though statements about employment and economic impact, unsupported by real or estimated dollar numbers, are included in the assessment.

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4|7.A The physical distinction between the UPF80 and the UPF5 is not clear from the information presented in the SWEIS—the description suggests the two alternatives have identical floor space and equipment; the designations of throughput capacity appear to be a distinction without a difference. The only apparent difference is the number of people working, a difference that can be erased by an ad in the newspaper. If there is a real capacity difference between the UPF80 and the UPF5, the SWEIS should make it clear—the proliferation implications are enormous. The UPF80 expands US warhead production capacity and sends a powerful provocative message to the rest of the world; the UPF5 is more supportive of US nonproliferation goals and indicates the seriousness of the US commitment to a nuclear weapons free future.

5|10.C Failure to provide cost estimates is a serious deficiency. The United States is currently in a severe economic recession; funding for many social services and programs are being constrained at the very time they are most needed. The cost of each of the proposed alternatives is a significant if not determinative factor. The SWEIS is long on benefits, especially of its preferred alternatives, and makes claims of cost savings through efficiencies, workforce and footprint reduction, etc. But no legitimate cost estimates of the five alternatives is presented which would allow a comparison of costs and benefits associated with each alternative. The final decision will certainly be informed by such an analysis—since NEPA requires an analysis of socio-economic impacts, the analysis must be included in the SWEIS and subject to broad scrutiny.

The recent report of the General Accounting Office on DOE's cost- estimating practice does not inspire confidence in the cost estimates that have been publicized to date about the UPF; rather than follow accepted procedures for estimating costs, NNSA has provided estimates that apparently have no basis in reality and at least a 50% margin of error—the difference between two and three billion dollars is significant. NNSA should provide reliable cost estimates resulting from approved estimating procedures to allow a fair comparison of the cost/benefits of each alternative.

The Purpose and Need

This is the starting point for the SWEIS. The purpose and need are predicated on a number of documents and policies which define the mission requirements at Y12. The SWEIS lists several of the documents which govern current missions: the 2001 Nuclear Posture Review, the START Treaty (now expired), the Moscow Treaty. Each of these demonstrates the continuing reduction of the US nuclear stockpile.
Diminishing requirements have already led to the decision to downsize the Special Materials Complex.

6|1.A While it is impossible to predict the future with certainty, it is clear that US nuclear weapons policy is in transition. Presidents Obama and Medvedev are preparing to sign a new START Treaty which will reduce the current stockpile ceiling to 1,675 warheads.
President Obama has called these reductions a "first step" toward deeper reductions. Most experts foresee a stockpile size of 1,000 warheads or less within the decade. The Nuclear Posture Review being prepared for President Obama is now expected to be released in March of 2010—it will provide force structure requirements which will directly impact the mission requirements at Y12.

7|2.B After delaying the release of the Draft SWEIS for several years, NNSA has now declined to hold the public comment period open an extra sixty days to allow for an informed engagement with the public after the Y12 mission requirements are more clear. NNSA says it has built in flexibility with alternatives that cover a range of possibilities.

8|1.A This is not preferable to a focused examination of a specific proposal; it is inefficient and places an unnecessary burden on the public to address hypothetical scenarios.

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Within these constraints of uncertainty, it is still possible to reflect on the impact on Y12's mission requirements from what is known about the future of the US nuclear stockpile. Five critical facts:

6|1.A, 1.B (cont) 1. The stockpile will continue to get smaller. Reductions set in the START Treaty of 2010 will retire more than 500 warheads; President Obama has indicated his determination to pursue further deep reductions, and President Medvedev concurs.

9|1.A 2. The warheads which remain in the US arsenal will need to be maintained. Given the recent report of the JASON certifying the reliability of the US arsenal, it is clear that a program of surveillance and maintenance will be sufficient to guarantee the reliability of the existing US stockpile for the forseeable future—at least forty-five years. There is no urgent need for expanded warhead production capacity.

10|9.D 3. There is currently a significant backlog, at least ten years and maybe as many as fifteen years, of retired warheads awaiting dismantlement. Reports from Y12 indicate storage capacity issues for secondaries and cases continue to grow. It is clear that existing capacity is not sufficient to address the dismantlement requirements from previous arms reduction agreements and warhead retirements.

4. The need for dismantlement capacity will grow, rapidly and urgently, as new arms control agreements enter into force. Current facilities, already stretched beyond their capacity, will be expected to absorb and process hundreds more secondaries and cases over the next decade.

11|1.D 5. The US has no need for expanded warhead production capacity.
Statements from undersecretary Ellen Tauscher in January, 2010, affirm the US will not pursue new warhead design or expanded military capabilities for the nuclear arsenal.

The Nonproliferation Impacts of Expanded Warhead Production

12| 1.E.1 The impact of the UPF decision on US efforts to constrain nuclear proliferation is perhaps more important than the local or regional environmental and socioeconomic impact analyzed in the SWEIS. The SWEIS does not address nonproliferation concerns in detail, a shortcoming which must be rectified in the final SWEIS—or addressed in a Supplemental EIS on Nonproliferation Impacts. The Y12 SWEIS refers instead to nonproliferation analysis prepared for the Stockpile Stewardship and Management PEIS in 1996, asserts the program is fully consistent with US obligations under the Nonproliferation Treaty, and further asserts the analysis remains valid.

13|1.C The arguability of the 1996 assertion is obvious; it was not tested against the expectations or understanding of other NPT parties. The director of the International Atomic Energy Agency, Mohammed ElBaradei (recipient of the 2005 Nobel Peace Prize) referred to US continued weapons production activities when he said, in an article in the Financial Times, "The US government insists that other countries do not possess nuclear weapons. On the other hand, they are perfecting their own arsenal. I do not think that corresponds to the treaty they signed." Thomas Graham, leading US arms control negotiator for more than twenty years, has said, "In exchange for a commitment from the non-nuclear weapons states not to acquire nuclear weapons, the nuclear weapons states, in the Nonproliferation Treaty, undertook to engage in nuclear disarmament negotiations aimed at the ultimate elimination of their nuclear arsenals. But the nuclear weapons states have never really delivered on the disarmament part of this bargain."

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13|1.C (cont) To assert that a program designed to extend the life of the US nuclear stockpile for the indefinite future is in compliance with the NPT, in which the US promised to pursue in good faith complete disarmament at an early date defies common sense. The plain meaning of the words of the NPT contradict the DOE's 1996 assertion.

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Arguments about whether the DOE's 1996 self-absolution was valid can be set aside, though. The context—indeed the entire landscape—for nuclear nonproliferation discussions has changed so dramatically and so fundamentally that no clear-thinking person can imagine an analysis prepared in 1996 would be anything more than historically interesting. Since 1996, US nonproliferation goals have changed—what were then fears are now realities—North Korea has the bomb, and Iran has a suspect nuclear program. Proliferation fears—unfounded, as it turned out—led the United States to invade a sovereign country. The Nonproliferation Treaty Reviews in 2000 and in 2005 made clear the dissatisfaction of non-weapons states with US and other nuclear states' foot-dragging.

In 2007, and again in 2008, former Secretaries of State Henry Kissinger and George Shultz, along with Admiral William Perry and Senator Sam Nunn, opined in the Wall Street Journal that US security requires aggressive leadership toward disarmament. The basis for their argument was a recognition that US security is directly linked to preventing the proliferation of nuclear weapons, and the US can not hope to achieve its goals if it continues to maintain a nuclear arsenal. In an article in the spring issue of the Yale Divinity School Journal Reflections, Shultz writes: "So far as the proliferation of nuclear weapons and their potential use is concerned, we are at a tipping point. The danger is all too real. The simple continuation of present practice with regard to nuclear weapons is leading in the wrong direction. We need to change the direction." More than 60 leaders from around the world, diplomatic and military, have joined the Gang of Four; Britain's prime minister, speaking in New Delhi in January 2008, pledged the UK to be "in the forefront of the international campaign to accelerate disarmament amongst possessor states."

14|1.E

It is an undeniable fact that none of these people were saying these things in 1996. They are saying them now for two reasons: the nuclear geopolitical reality has shifted irreversibly since 1996, and with that shift comes a new understanding of the nuclear threat and the steps required of the US to successfully defuse the threat.

In other words, no analysis of nonproliferation concerns in 1996 can be relied upon with a straight face in 2010; to attempt to do so, as the Y12 SWEIS does, is either a demonstration of ignorance or a clumsy attempt to dodge the most serious and central concern attached to the proposal to build a new weapons production facility. Whichever of those explanations lies closer to the truth is not important—what is important is the necessity of a serious, thorough consideration of the nonproliferation impacts, circa 2010, of the proposal to build a new nuclear weapons production facility as part of a complex-wide effort to reconstitute full-scale warhead production capacity.

In December, 2009, Ambassador Robert Grey, formerly US Ambassador to the Conference on Disarmament and now director of the Bipartisan Security Group, addressed the issue directly in briefings on Capitol Hill saying, "If we modernize the weapons complex and develop new weapons, our credibility with the international community is zero."

US nuclear policy in the early days of 2010 has been likened to a puzzle being assembled from various pieces—renewal of the START Treaty, the Nuclear Posture Review, the Nonproliferation Treaty Review, decisions on modernization of the weapons complex, the effort to ratify the Comprehensive Test Ban Treaty, the 2011 budget—the picture that will emerge when these pieces are assembled is not yet clear. But US credibility with our negotiating partners is the table on which the puzzle will be put together. A decision to maintain or expand warhead production capacity beyond that needed for surveillance and maintenance of a diminishing

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14|1.E (cont) stockpile—in other words, any action that may be perceived as a commitment to reconstitute the full-scale warhead production capacity to maintain or expand the US nuclear arsenal for the indefinite future—will kick the legs out from under the Nonproliferation Table.

If the NNSA believes it can move forward with a UPF, or a UPF80, or even an "expandable" UPF5 without undermining US nonproliferation efforts in 2010, it has a responsibility to explain its rationale and subject it to external review.

Purpose and Need Reality Check

15|1.B.1 The Y12 SWEIS contradicts itself with regard to current stockpile requirements. (p. S-16: "The Moscow Treaty…commits the US and Russia to deep reductions (i.e. 1,675 operationally deployed strategic nuclear warheads by 2012)." Next sentence: "As of May 2009, the US had cut number of operationally deployed strategic nuclear warheads to 2,126, which meets the limits set by the Treaty for 2012."

16|1.A.1 According to the JASON study analyzing the Stockpile Stewardship Program completed in 2009, the US has a safe, secure, reliable stockpile. Since 1996, more than $90 billion has been spent "modernizing" the nuclear weapons stockpile. By 2018 (the time a new UPF would come on-line) the US stockpile of refurbished "Life Extended" warheads will exceed the maximum number allowed by the START Treaty.

Since 1996, the Stockpile Stewardship and Management Program (SSMP) has been responsible for maintaining the US nuclear stockpile and assuring its safety, security and reliability. This has been achieved by modifying and/or refurbishing current weapons systems. For instance, the B-61 was modified in the mid-1990's and resulted in the B61-Modification 11. The modifications included, among other things, a hardened nose cone which gave the weapon an earth-penetrating capability. Since the late 1990's, modifications and refurbishments have been performed as part of the Stockpile Life Extension Program— the W87 warhead was refurbished with more than 500 "Life-extended"
warheads reintroduced to the stockpile. Today, refurbishment and modification of the W-76 (resulting in the W76-Mod 1) are being conducted; according to the current schedule, approximately 2000
W76-1 warheads will be in the stockpile by 2018; a Federation of American Scientists/Natural Resources Defense Council fact sheet estimates 800 will be in the stockpile by 2012.

Add to this more than 400 W88 Trident (submarine-launched) warheads put in service in the late 1980's, and the total number of recent vintage warheads in the arsenal in 2012 is 1,786; by 2018, that number would swell to 2,986.

14|1.E (cont) At this point, it seems clear that the idea of a full-scale UPF, or any Alternative that would maintain a production capacity throughput of 125 warheads/year, stands outside the bounds of what is "reasonable." Construction of a $3.5 billion warhead production facility when the US is attempting to regain its stature as an international leader in nonproliferation efforts, to assuage concerns of non-nuclear weapons states on the eve of the NPT Review, and to dissuade Iran from further developing its nuclear capability is not only not reasonable, it is not rational.

17|7.B The UPF125 is no longer NNSA's bomb plant of choice. Whether NNSA has abandoned its original proposal because it recognized the changing realities of US nuclear stockpile force structure or because it recognized a full-scale UPF would be a hard sell to Congress does not matter. What matters is the NNSA no longer needs to be able to build
125 secondaries and cases/year.

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17|7.B (cont) By a not-so-remarkable coincidence, the warhead production capacity of the preferred alternative is 50/80 warheads per year—not 60/90 or 50/75—and 50/80 warheads per year matches the capacity of the Chemistry and Metallurgy Research Replacement-Nuclear Facility at Los Alamos. No explanation is given for this apparently arbitrary capacity or for the range of warheads rather than a target number.
Two points are worth noting. First, the range is meaningless—if the Capability-sized UPF has the capacity to produce 80 warheads/year, it is the UPF80. Second, the 50-80 capacity has no relationship to stockpile surveillance, stockpile stewardship, stockpile maintenance or Life Extension requirements—it reflects instead a commitment by the United States to reconstitute in toto production capacity for new nuclear warheads—pits at Los Alamos, secondaries at Y12, and nonnuclear components at Kansas City.

6|1.B (cont) Since taking office in January, 2008, President Barack Obama has made several public statements regarding the nuclear policy and commitments of the United States. In none of these statements has the President indicated the United States has a need for expanded warhead production capacity. To the contrary, the Administration has stated on several occasions that the United States expects to be a global leader in nuclear disarmament; President Obama has pledged the US to deep stockpile cuts while maintaining a safe, secure and reliable stockpile as we move to disarm. In a news report on January 13, 2010, undersecretary of state Ellen Tauscher, a key point person for the Obama Administration on nuclear weapons issues, said the NNSA will maintain the nuclear stockpile without adding to its capabilities, without testing and "without causing people to be concerned about what we are doing."

18|3.A At this point, it is clear that the equation of purpose and need has been significantly redrawn since the UPF was first proposed in 2005, and has continued to seek a new equilibrium since the Draft Y12 SWEIS was published in October 2009. The US has now disavowed new warhead production and significant modifications to the existing stockpile.
As Tauscher indicates, this shift is an effort to demonstrate the seriousness of the US commitment to nonproliferation. As the US commitment to nonproliferation grows, the "need" for the UPF80 evaporates.

17|7.B, 8.0 This leaves on NNSA's table three alternatives: No Action, Upgrade-In- Place, and the UPF5. Each of these is, according to the Y12 SWEIS, examined because it is reasonable. The UPF5 proposes a new facility, cost undeclared, sufficient to meet the needs of a Stockpile Stewardship program that provides passive surveillance and maintenance of the stockpile and can produce a limited number of replacements for components lost during destructive testing. What is most important about the UPF5 is the number—5. NNSA says this is the capacity needed to maintain the existing arsenal.

19|8.A NNSA identified the UPF80 as its preferred option in the SWEIS (pp.
3-41,42). OREPA notes that every single benefit of the UPF80 listed accrues equally to the UPF5. In other words, there is no distinguishing benefit of the UPF80 over the UPF5. On the other hand, the one distinctive difference—the UPF80 reconstitutes full-scale nuclear warhead production capacity—carries a profound liability; it undermines the President's commitment to demonstrate global leadership in disarmament efforts and it corrupts US nonproliferation goals. A policy of "do-as-we-say-not-as-we-do" is untenable on its face; it gives tacit permission to Iran and other states to develop nuclear capabilities, and is clearly provocative to nuclear weapons states. And since there is no need for an 80 warhead/year production capacity, it is unnecessarily provocative. (One test of the impact of the UPF80 argument in international nonproliferation discussions is
simple: If Iran were proposing to build this facility outside Tehran, what would the US response be?)

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20|16.A Since the stockpile can be maintained in a safe, secure and reliable state by the UPF5, or by a dismantled, down-sized 5-warhead/year production center in a upgraded existing facility, other factors may be determinative as NNSA makes its decision. In today's economic climate, cost must be a consideration. The safety of workers and the public is also an important consideration. Reliability of the facilities is a further consideration; history has shown us that operational interruptions for safety reasons are tolerable, so minor or temporary interruptions may be accommodated, but over the long- term facilities must be generally reliable. Ultimately, though, it is the changing mission of Y12 that should determine the direction the Y12 SWEIS sets out for the future.

Alternative 6: Dedicated Dismantlement Facility | Consolidate and Down-Size Production Capacity (5 warheads/year) in Existing Upgraded Facility

The Oak Ridge Environmental Peace Alliance proposes a sixth alternative to the five outlined in the Y12 SWEIS. OREPA believes its alternative most fully addresses Y12 mission requirements for the foreseeable future. It has the added virtue of maintaining more jobs than the UPF80 or the UPF5, and achieves the cost savings of a reduced security footprint.

21|9.A The future of Oak Ridge is in dismantling tens of thousands of nuclear weapons. Because this part of Y12's mission has been largely neglected for decades, there is a 12-15 year backlog of retired secondaries and subassemblies awaiting dismantlement and disposition.
The backlog is large enough to create storage issues and, on more than one occasion, criticality safety violations.

10|9.D (cont) Y12 projects future dismantlement at a steady rate—but this is not enough to meet the country's needs and certainly not enough to persuade other nations we are aggressively acting to reduce our stockpile and meet our obligations under the NPT. Y12 should establish the capability to more than double its throughput for dismantling nuclear weapons; a new dedicated, single-use facility, with security, safeguards, and transparency designed in, should be built in Oak Ridge.

The current Y12SWEIS pays little attention to dismantlement operations, treating them as an adjunct to the production mission of the UPF. Over the course of the next decade, however, the need for production capacity will continue to diminish, and the demand for dismantlement/disposition capacity will balloon. While there is some overlap of operations and equipment used in production and dismantlement operations, DOE/NNSA documents also suggest Dismantlement operations can stand alone. (See The Future of Y12, attached, for a detailed analysis.)

22|9.B OREPA proposes construction of a new, single-purpose Dedicated Dismantlement Facility, equipped only with machines and equipment necessary for dismantlement. The DDF must avoid dual-use capabilities if it is to remain unprovocative. The facility design should incorporate verification and inspection protocols as they are developed.

21|9.A (cont) Production capacity for the purpose of stockpile surveillance and maintenance can be accomplished at a 5 warheads/year throughput capacity within an existing facility, a capacity now known to be "reasonable" according to the NNSA. In keeping with the goals of NNSA's Integrated Facilities Disposition Project, operations can be consolidated and downsized in an existing facility, mostly likely Building 9212, which is slated to receive more than $100 million worth of upgrades in the next decade. Envisioning US participation in an international verification regime during disarmament, safeguard and transparency protocols should be

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19|8.A (cont) incorporated into the upgrades as they are designed. Throughput capacity of five warheads a year would be WD102 adequate to assure the safety and security of the current stockpile as it awaits retirement.

22|9.B (cont) The location of the DDF should be determined by a balancing of mission, security efficiency, and environmental, safety, and health requirements.

21|9.A (cont) Under OREPA's Alternative, not currently included in the Y12SWEIS, the high security footprint could be reduced by as much as 60%. The new, dedicated dismantlement facility could be designed and built at considerable savings over the proposed UPF, and would provide the most efficient and effective technologies for this increasingly critical mission as well as safe working conditions for its workforce over its 50-60 year life span.

The currently operating production facilities can be upgraded to standards protective of worker and public health and safety as well as protective of nuclear materials themselves for $100 million (NNSA's estimate)—a dramatic savings over the estimated $3.5 billion cost of the UPF.

23| 12.H Under NNSA's proposals, a new UPF would have a significant detrimental economic impact on the Oak Ridge community and surrounding regions. Workforce reductions range from 40% (nearly 2,600 jobs lost) in the UPF80 scenario to 48% (3,100 jobs lost at Y12, nearly 11,000 jobs lost in the region) under the UPF5 alternative. Compounding the regional negative economic impact: the jobs to be cut would belong-term, high-salary jobs (annual DOE median salary is $54,000) rather than lower-paying short term construction jobs (industry average $26,000).

22|9.B cont. Alternative 6 provides a win/win for the local workforce and regional economy. Construction of a new Dedicated Dismantlement Facility along with ES&H upgrades to existing facilities would preserve construction jobs and maximize job security for operational workforces—an increase in dismantlement jobs might be expected to mitigate the impact of any job losses experienced due to the inevitable reduction in Y12's production mission.

24|9.A In any scenario, the increase in security efficiency combined with a reduction in the high security area footprint will result in a decrease in security employment. Reduction of the high security footprint should permit acceleration of demolition and cleanup projects at Y12 which are currently hampered by security concerns—an aggressive effort by local leaders to secure funding for cleanup could offset losses in the security sector and minimize the regional economic impact. This is true for OREPA's alternative as well as NNSA's.

21|9.A (cont) OREPA's alternative is the only alternative that fully supports the nuclear policy goals of the current Administration: it supports maintenance of a safe, secure and reliable stockpile through passive surveillance and maintenance as the stockpile diminishes toward zero in a way that bolsters US nonproliferation efforts on the international stage by demonstrating leadership as called for by President Barack Obama in Cairo, Egypt. DOE's alternatives fail to walk this tightrope, sacrificing US nonproliferation/security goals on the altar of a reconstituted nuclear weapons production complex.

Finally, Alternative 6 has the potential to save billions of dollars, reducing the pricetag for new construction from $3 billion for a new UPF, to funding for a new dismantlement facility (cost to be determined, but likely in the neighborhood of $1 billion) and upgrades to existing facilities (NNSA estimate $100 million). The Final Y12 SWEIS should fully analyze the economic impact of Alternative 6. Given the recent findings of the General Accounting Office that "The cost estimates of the four projects we reviewed [one of which was the UPF] lacked credibility because DOE did not sufficiently cross-check the projects' cost estimates with ICEs, use best

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5|10.C (cont) practices when identifying the level of confidence associated with the estimates, or sufficiently WD102 analyzing project sensitivities,"
cost estimates for all alternatives should be subjected to a rigorous outside audit.

What's not in the SWEIS, but must be

Seismic events/Natural Phenomena

The Department of Energy's Safety Survey, circa 1993, identified seismic issues as a significant concern for the facilities at Y12.
According to an 1994 article in Science magazine, the East Tennessee seismic zone ranks second in the United States in seismic activity.
In the article, researchers at the University of North Carolina warned that the high frequency of low-level activity should not be taken as a sign that future activity would be low-level, but just the opposite—high frequency low-level activity could be expected to predict a significant seismic event in the future.

25| 12.M.1 The SWEIS does not address seismic risks in detail. It asserts that, under the No Action alternative, there is no change in risk from earthquakes. In assessing the UPF, the SWEIS states new construction would incorporate protections into the design of the new facility that would reduce risks from seismic activity, but absent specific design information, the SWEIS says a full analysis of consequences of an earthquake are not possible. Nevertheless, the SWEIS declares a UPF designed to Performance Category 3 would be sustain damage "less frequently than in existing facilities."

This fact does not relieve the NNSA of its obligation to conduct a rigorous analysis of the effects of earthquakes, including but not limited to those that can be "reasonably" expected. Given the nature of work, the number of workers and the materials placed at risk at Y12, all alternatives, including OREPA's alternative, should be fully analyzed with regard to structural building performance in severe events that may exceed the "reasonably expected", including catastrophic failure of some or all structures. This analysis should also examine other complications that might arise in the event of a significant earthquake which could impact activities in Bear Creek Valley. For instance, if an earthquake or tornado damages the pipeline that currently adds Clinch River water to the outfall at East Fork Poplar Creek, bringing Y12 in noncompliance with its water permit, what will the impact be on operations that depend on water?
If an earthquake causes a breach in the concrete quilt and the cap covering old burial grounds and leads to a release of volatile or other toxic materials to air, soil or water that limits worker access to the valley, what will the impact be on ongoing operations?

While it is not necessary that Y12 production operations continue uninterrupted in the event of a natural phenomena event, it is crucial that building integrity be maintained for security purposes as well as for worker, environmental and public health protection. It is not clear from the description provided in the SWEIS, that a PC2 or even a PC3 designation provides that level of building integrity.

Similar analysis addressing risks from tornadoes and flooding must also be conducted; the location of Y12 in a narrow valley, combined with the naturally high water table in Bear Creek Valley, indicate a significant risk from floods. The immersion of HEU in water changes criticality calculations dramatically, adding a unique dimension to the analysis required in assessing risks from flooding.

Accident scenarios and risk analysis of release events

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The SWEIS evaluation of accident scenarios cites methodologies used to "evaluate the potential consequences associated with a release of each chemical in an accident situation." (p. 5-91) This language suggests multiple materials were analyzed for risks to workers, the environment and the public from releases. But the actual accident scenario description says "the chemical analyzed for release was nitric acid," suggesting only one chemical was used for computer modeling to evaluate consequences associated with a release. There is no indication that nitric acid is a reasonable or realistic substitute for all possible chemical releases—does it match anhydrous hydrogen fluoride, for instance in solubility, migration in soils, dispersion in air? Is nitric acid chosen as a representative of the worst possible chemical released? 26|12.M.2

The SWEIS should analyze a range of accident/spill scenarios, including multiple contemporaneous excursion events due to catastrophic events. Chemicals and hazardous materials that represent the full range of risks posed by materials used at Y12 should be analyzed. "The purpose of a SWEIS is to provide…an analysis of potential individual and cumulative environmental impacts associated with ongoing and reasonably foreseeable new operations and facilities," [Y12 Draft SWEIS, p.1-22] not a narrow look at one scenario involving one hazardous material or an evaluation of impacts associated with one new facility or operation.

The bounding accident considered in the Y12 SWEIS is an aircraft crash/attack on the UPF. This may, in fact, be the bounding accident for the UPF, but it is not the bounding accident for Y12 site-wide, including the UPF. In the site-wide EIS, an earthquake of magnitude great enough to cause structural failure of several facilities—including the UPF and emergency response and security facilities (the CCC, if built, for instance), with ongoing or uncontrolled releases of hazardous materials—volatiles, fuels, toxic contaminants, uranium, lithium, beryllium, natural gas, mercury—into air and water, loss of material controls…this apocalyptic scenario is actually not outside the realm of probability given the confined and compact location of facilities at Y12. A detailed analysis of the cumulative and compounding impacts possible in a severe earthquake or tornado event should be analyzed in the SWEIS as a "bounding event." 25|12.M.1 (cont)

Impacts of the harm, potential or real, of releases of chemicals and materials are quantified in ways that evaluate risks to humans.
Environmental impact statements are required to analyze risks to the whole environment; impacts in accident scenarios should also be calculated for other life forms known to populate Y12 and the immediately surrounding environs. Human beings are not the only forms of life with value. Endangered or protected species are not the only species impacted—though they lack legal protections, impacts on other species should be quantified and considered; a fundamental premise of NEPA is that, all things considered, options that limit harm to the environment are preferable to those which cause more harm and, in any event, decisions should be informed fully about the environmental consequences likely to flow from them. 27|12.M.3

The impact on waste streams

Several of the alternatives proposed for the future of Y12—the UPF125, the UPF80, the UPF5, and the Dedicated Dismantlement Facility, will downsize the footprint of Y12's controlled access area and will permit decommissioning and demolition of a number of facilities, some of which are contaminated with radioactive and hazardous wastes from past operations. 28|12.L

The SWEIS must analyze the waste streams generated by accelerated D&D; wastes must be characterized fully and quantified. Treatment, disposal and/or storage options for those wastes should be evaluated.
In addition, the Y12 SWEIS should identify other cleanup operations which may have an impact on the environment that are likely to take place over the next five-seven years. In cases where waste streams might compete for limited storage or disposal space, the SWEIS should be clear about the criteria that will be used to

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make decisions. The use of off-site facilities, and the transportation hazards attendant to off-site shipments, should be evaluated and compared to the benefits and hazards of on-site treatment, storage or disposal.

The Draft SWEIS acknowledges that massive waste streams will be generated during D&D but does not analyze them, stating only that they "cannot be estimated without a detailed assessment of the facilities." This is insufficient and does not meet the standard required of an EIS. It may be true that it is not possible to fully characterize exact quantities of waste with specificity, but that does not mean gross generalizations are the only thing that can be said [e.g. "D&D activities would also cause health and safety impacts to workers (occupational and radiological), as well as potential health impacts to the public through the release of radiological materials…" p. 5-98] The Final SWEIS must do better—either attempt a thorough-going characterization of waste streams, or propose a timeline for preparing a Supplemental EIS on Waste Streams from D&D. 1|2.F (cont) 28|2.L (cont)

At present, there is no other forum for a comprehensive analysis of environmental management activities at Y12. When OREPA attempted to obtain from DOE or the state of Tennessee a list of all cleanup/waste management projects at Y12 in the last five years, along with a simple indicator of the status of projects, we were told that no such list exists. This segmentation of cleanup projects has obvious disadvantages—the SWEIS provides a vehicle for at least identifying cross-cutting issues and establishing a minimal level of information that can be used to coordinate cleanup/waste management activities.
Since no such vehicle exists otherwise, the SWEIS should be a site- wide environmental impact statement. 29|12.P

Risks from releases

The SWEIS treatment of potential releases to air and water is partial and deficient. It does not list materials/contaminants used at Y12, does not provide information about scenarios in which materials might be released, does not even use a probability/risk matrix to perform a cursory overview of risks posed by the various materials used in uranium processing operations at Y12. It may be true that some small fraction of these materials is classified, but the vast majority of materials have been documented elsewhere—in the Oak Ridge Health Agreement Steering Panel study, for instance. The SWEIS can provide detailed analysis of these materials and assessment of risks associated with release scenarios without disclosing their purpose. 30|12.J.3

In instances where releases are examined, the analysis must be complete and meaningful. With regard to Uranium discharged to the atmosphere, for instance, the amount of Uranium released is measured in curies. Uranium is also a toxic heavy metal which carries risks from its chemical properties; these risks must also be evaluated, along with an analysis that combines the biologic and radiologic risks. Use of curies as unit of measure gives no hint to the amount of material released. 31|12.J.4

An example of the level of detail appropriate for analysis in the SWEIS can be found on pages 2-16 and 2-17 of the Draft SWEIS, where NNSA provides detailed descriptions, including quantities, of reductions in materials through the Pollution Prevention, Conservation and Recycling Programs.

According to NNSA, "NEPA ensures that environmental information is available to public officials and citizens before decisions are made and actions are taken," (Y12 Draft SWEIS, p. 1-22). This has not been the case during the preparation of the Y12 SWEIS. No formal opportunity for questions was provided during the public hearing—NNSA provided instead a stand-up poster session with select personnel, a setting decidedly unconducive to in-depth discussion of public concerns. Requests by the Oak Ridge Environmental Peace Alliance for an informal work session that would permit questions and answers in order to fill in gaps in the Draft SWEIS and enhance public understanding of operations and requirements was flatly denied. 32|2.E

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Water Quality

33|12.D Water quality, particularly the negative impact of Y12's operations on East Fork Poplar Creek, continues to be a concern. The SWEIS indicates 70kg or Uranium was released to the offsite environment through liquid effluent in 2007 (apparently the most recent year for which numbers are available). The SWEIS also indicates NNSA has appealed for relief from water permits, and that mercury releases at Station 17 exceed Tennessee Water Quality Criteria 75% of the time.

As noted above, D&D, and likely new construction, has the potential to add to this burden, and the site-wide EIS is the starting point for an assessment of the characteristics of that additional burden.

Nuclear Materials from other Locations

Y12's mission includes support for the Global Threat Reduction Initiative. Y12's role is to support the retrieval, processing and disposition of Special Nuclear Materials. The SWEIS addresses this mission (p. 5-94ff) and refers to documentation prepared for previous shipments of materials to Y12.

The treatment in the SWEIS of materials received from foreign sources is inadequate. Impacts are assessed only for Special Nuclear Materials. In reality, special nuclear materials are often only part of the total material received. During Project Sapphire, for instance, more than 100 barrels of waste were received at Y12; the amount of Uranium was only 1,245 pounds, a miniscule fraction of the total amount of waste material imported to Y12. Environmental documentation ignored this other waste material. At the time the Project 34|12.Q Sapphire EA was completed, and a Finding of No Significant Impact issued, DOE had not even fully characterized the accompanying materials to determine what hazardous or toxic materials might be present; it asserted that characterization of a random sampling was sufficient, though the contents of 100 barrels were not homogenous.

The analysis of impacts from the GTRI must be comprehensive and detailed; the impacts of all materials, not just the Special Nuclear Material, must be included. In some cases this will be a relatively easy project. In other cases, like Project Sapphire, it may require an intensive effort. In all cases, workers and the public should be assured ahead of time ("before decisions are made," p. 1-22) that Y12 has the capacity and the capability to safely manage and dispose of all material associated with shipments under the GTRI, not just special nuclear materials.

Work for others

35|12.R The Work for Others Program at Y12 has continued to grow over the last nine years (since the last SWEIS). Work for Others Program activities should be described in detail in the SWEIS, along with the facilities in which the work takes place, materials used, waste streams generated, potential impacts of releases, etc.

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The above comments represent the concerns of the Oak Ridge Environmental Peace Alliance and its members. These comments will be supplemented by additional comments which may identify additional

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concerns by members of OREPA who submit their comments directly as part of the formal commenting process.

Questions about these comments should be addressed to OREPA, c/o Ralph Hutchison, coordinator, P O Box 5743, Oak Ridge, TN 37831; communications by email should be sent to orep@earthlink.net.

Supplementing these comments is The Future of Y12, also being submitted as part of the formal record.

Submitted 29 January 2010
Ralph Hutchison, coordinator
Oak Ridge Environmental Peace Alliance

finals=Final SWEIS Summary
finalf=Final SWEIS Full Set
rod=Record of decision

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[redacted]

From: Ralph Hutchison [mailto:orep@earthlink.net]
Sent: Wednesday, May 19, 2010 1:55 PM
To: Borgstrom, Carol
Cc: Gorman, Pamela (P1G)
Subject: Y12 SWEIS and wetlands disturbance

Dear Pam and Carol,

I am writing to call your attention to the current chain of events related to preparations for construction of the UPF and the Draft Y12 SWEIS.

On May 9 I became aware, through the posting of a public notice regarding an Aquatic Resource Alteration Permit application, of a proposal to build a haul road in support of UPF construction through a wetlands area—the haul road would require the fill of an acre of wetlands and the disturbance of two surface streams and Bear Creek. The permit notice states that impacts on fish and aquatic life were "not assessed."

1|12.T The reason I am addressing this concern to you is two-fold. First, the Y12 Draft SWEIS makes no mention of wetlands disturbance in its analysis of environmental impacts resulting from construction and operation of the UPF. Second, the Y12 Draft SWEIS says: "Proposed construction sites would be surveyed for the presence of special status species before construction begins, and mitigation actions would be developed. (p. 5-61, Draft Y12 SWEIS, §5.8.6.)"

While I realize the DOE's regulations permit certain preparation activities related to permits and design to proceed prior to the completion of an EIS, it seems to me that this particular permit application, which includes wetlands disturbances not considered in the Draft SWEIS and which, in addition, directly contradicts an assurance in the Draft SWEIS, should be subjected to rigorous examination. On its face, the permit application calls into question DOE's commitment to proceed in ways both cognizant of and protective of environmental resources.

Since the potential for wetlands disturbance was not addressed forthrightly in the Draft Y12 SWEIS, OREPA retains the right to raise questions in the Final Y12 SWEIS about this issue and other related water issues that were not addressed in the Y12 SWEIS.

2|2.F I do not know, and DOE/NNSA have not provided information that would enable me to know, what other activities are taking place in preparation for the construction of the UPF in advance of a decision to actually build a facility or even to determine the size of the facility. This instance, though, points to an inevitable lapse when a Site Wide EIS is prepared with the intention of providing NEPA coverage for a particular facility. In the case of the Y12 Draft SWEIS, the focus on the UPF to the exclusion of almost everything else at Y12 has given short shrift both to the non-UPF activities and operations at Y12 and, as we see here, to the more detailed considerations appropriate to a single-facility EIS.

3|2.E OREPA has asked the state of Tennessee to hold a public hearing on the ARAP permit currently under consideration and we hope they will grant our request. Earlier in the SWEIS process OREPA asked DOE/NNSA for a public workshop that would allow for questions/answers and detailed discussion (modeled on successful workshops held in 1994) of issues that can not reasonably be covered in a stand up "poster session," or the one-way conversation of a public hearing. Had our request been granted (and it's still not too late!) these issues may well have surfaced and been dealt with at that time in an appropriate way. To have them dribble out one at a time to be dealt with as separate instances, serves no one's interest—it is neither efficient nor responsible.

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3|2.E (cont.) OREPA has written to the state requesting a public hearing on DOE's permit application; it seems to me it would be in DOE/NNSA's interest to take advantage of a chance to explain the proposal and its implications to the public through this process.

Peace,
Ralph Hutchison, coordinator
OREPA

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Comments of the Oak Ridge Environmental Peace Alliance
on the Wetlands Assessment prepared by the
Department of Energy/National Nuclear Security Administration

9 July 2010

General comments

Subsequent to the publication of the Draft Y12 Site-Wide Environmental Impact Statement, and after the close of the public comment period on the Draft Y12SWEIS, the Department of Energy/National Nuclear Security Administration has disclosed its intention to construct a haul road to facilitate construction of the Uranium Processing Facility; the purpose of the haul road is ostensibly to transport large quantities of soil excavated from the UPF site in preparation for construction. The proposed haul road will bisect and impact several wetlands areas; hence this proposal.

1. OREPA's comments on the Wetlands proposal are submitted to meet the deadline for comments. They should not be construed as an acceptance of this piecemeal consideration of environmental impacts associated with the construction of the UPF. OREPA believes the Department of Energy must meet its obligations under NEPA by either:

1|12.T.9 a) reissue a new Draft Y12 SWEIS with detailed plans on the environmental impacts associated with the UPF, including the excavation and relocation of massive amounts of soil, the construction of the haul road, the disruption of wetlands areas, and any other additional environmental impacts expected as a result of construction. The public should have an opportunity to provide full comments prior to the issuance of a Final SWEIS. Or,

b) issue the Final Y12 SWEIS based on the Y12 Draft SWEIS and prepare a separate, comprehensive Environmental Impact Statement specific to the Uranium Processing Facility which includes plans for massive excavation, characterization and disposal of soil, the construction of the haul road, the disruption of wetlands areas, and any other additional environmental impacts expected as a result of construction.

2|12.T.10 2. The wetlands proposal addresses only one small piece of the larger excavation/soil characterization/transport/disposal picture. The wetlands proposal lacks sufficient information on the excavation/soil characterization/transport/disposal plans to permit meaningful comment on those pieces of the UPF construction plans, and is an inappropriate vehicle for addressing issues tangential to the actual impact on wetlands of the haul road construction. OREPA recognizes the DOE/NNSA has an obligation to present the public with details on this major action that was not covered in the Draft Y12 SWEIS and to accept comment on those plans, either as part of a reissued Draft Y12 SWEIS or a separate EIS on the UPF.

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3|12.T.11 3. As this wetlands proposal is apparently intended as an amendment to the Y12SWEIS (labeled Appendix G), it is appropriate and necessary that the federal government provide the proposal and an opportunity to comment to all those who submitted comments on the Draft Y12SWEIS.

4|12.T.12 4. The Wetlands proposal is difficult to understand; the descriptions of the haul road and the terrain through which it will pass and the wetlands it will impact are difficult if not impossible to understand from the narrative and poor quality photos included, some of which have illegible labels of sites referred to. Putting together a coherent picture of the proposed road, the route, the physical geography, and the proposed changes is impossible from the written description.

OREPA believes the public deserves to understand this proposed action and the potential impacts as well as a thorough discussion of alternatives, and we believe this can only happen in a public hearing/public workshop session. We are requesting the DOE/NNSA hold a public hearing to enable the public to clearly understand the nature of this proposal, to ask questions for clarification, and to submit appropriate comments.

OREPA requested a public hearing from the state of Tennessee after reviewing the application submitted to the state which was woefully inadequate (impact on aquatic resources "not assessed"). Though the state has not formally responded to our request, we learned via the newspaper that our request was denied because the comment period had ended (we had learned about the proposal less than one week before the end of the comment period).

OREPA then reviewed the more detailed proposal submitted to the Army Corps of Engineers—this application more closely resembles the DOE/NNSA Wetlands Proposal; it provides much more information than the state permit but, as noted above, also suffers from shortcomings that make it difficult to understand the exact scope and impact of the proposed action. We requested a public hearing from the Army Corps; we were joined in our request by the Tennessee Clean Water Network and the Foundation for Global Sustainability; we have yet to receive a response from the Army Corps.

Specific comments

5|12.T.13 5. The Wetlands Proposal mentions (p.3) a concrete batch plant and the massive excavation of soils in preparation for construction of the Uranium Processing Facility Neither of these issues appeared in the Draft Y12 SWEIS, and the Wetlands Proposal is not an appropriate vehicle for details comments (nor does the proposal provide detailed information). Consideration of the environmental impacts of massive excavation/soil characterization/transport and disposal as well as the construction of a concrete batch plant must be incorporated in a NEPA process which allows for informed public comment.

6|12.T.14 6. The haul road proposal indicates the designed of the road was modified to minimize wetlands impact, including increasing slope (p.3)s. It would seem this design would also increase pollution from large diesel trucks laboring up a steep hill. The wetlands proposal does not address pollution impacts from extensive and long-term heavy equipment traffic

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6|12.T.14 (cont.) through the wetlands. No mention is made of tailpipe emissions or oil or other fluid leaks which would impact wetlands.

7|12.T.15 7. The wetlands proposal says there will be a discharge of materials into wetlands or "other waterbody" (p.3) The proposal should be specific about any impacted water bodies.

8|12.T.16 8. The wetlands proposal describes a "buffer zone" to be constructed "when possible" (p.4). The proposal should make clear who decides what is "possible" as opposed to what is "feasible" and should make clear the factors being considered during the decision-making process.

9|12.T.17 9. The wetlands proposal says that work done within existing wetlands will be done with manual labor to minimize impacts (p.4). This strains credulity—will tons of soil be removed, fill dirt distributed, packed, and paved over using only manual labor? If not, the wetlands proposal should include a detailed description of what parts will be manual labor and what will be done with machines and equipment.

10|12.T.18 10. The wetlands proposal references dry soil "storage" on p.4. What does this mean? Is storage temporary or permanent?

11|12.T.19 11. The wetlands proposal describes the consideration of Bear Creek Road as an alternative (p.4), but the final statement of rejection does not match up with the considerations listed above.

12|12.T.20 12. The wetlands proposal includes a detailed description of the activities undertaken to characterize the wetlands soils (p.7) but does not contain, in narrative, summary or table form, the results of those characterization activities.

13|12.T.21 13. The wetlands proposal identifies two species of concern in the areas to be disrupted; roosting habitat for the Indiana bat (p.9), and habitat for the Tennessee dace (p.18). The proposal says nothing else about them—no description of efforts to address habitat issues or to mitigate impacts for these listed species.

14|12.T.22 14. The wetland proposal describes some areas as "primarily man-made" (p.17). It is important to note that "primarily man-made" does not equate to "therefore unimportant, inconsequential, or unnecessary." The document notes in other places that human made habitats have existed long enough to have been incorporated by wildlife as important habitat.

15|12.T.23 15. The wetland proposal references soil sample analysis and says "no contaminated soil is anticipated." Given the history of environmental surprises on the Oak Ridge Reservation, this statement is meaningless. What's more, it is unnecessarily meaningless. We don't have to guess what the samples might show—we can wait and see what the results are. The wetlands proposal provides insufficient information about the sampling process to allow the public to have confidence that the sampling is adequate.

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16|12.T.24 16. The wetlands proposal says affected streams were checked for the presence of the Tennessee dace in February 2010 (p.18), which is the dead of winter. The streams must be checked again in summer (most preferable would be an accounting of the presence of dace in each season), and data must be incorporated into the wetlands proposal and made available to the public.

17|12.T.25 17. In describing mitigation efforts (p.19), the wetlands proposal notes that some mitigation efforts are expected to maximize the likelihood of successful mitigation of wetlands, but that others (60%) will not conform to the "important priority in defining appropriate wetlands mitigation" and are less likely to succeed. (You can lead a dace to water, but you can't make it thrive.) This concern should be addresses in detail in the wetlands proposal.

18|12.T.26 18. The wetlands proposal identified .51 acres of disturbed wetlands to "comprise valuable wetland and water quality functions for the streams of the Bear Creek watershed." The proposal should describe those functions in detail and also describe how the mitigation measures will sufficiently replace these valuable functions.

19|12.T.27 19. The wetlands proposal says (p.28) that portions of Bear Creek "could" be modified, and in the next sentence, that 70 feet of downstream channel "would" be modified. It is not clear what decision-process would determine if the initial could might be transformed to a would.

20|12.T.28 20. The wetlands proposal should include a description of "electrofishing. (p.28)

21|12.T.29 21. The wetlands proposal makes reference, in its conclusion, to "site access and perimeter modification is also unavoidable in the western footprint of the UPF complex." The antecedent for this reference is not clear, nor is the implication of the statement.

Submitted on 9 July 2010
Ralph Hutchison, coordinator
on behalf of the Oak Ridge Environmental Peace Alliance

James, Alan

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OR2D03

Draft Y-12 Site-wide Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010.

1|5.0 2|7.0 I support the alternative 2A of

3|3.B UPF is needed as the existing facility needs to be replaced. Some of the key infrastructure systems are 60+ years old. Some of the equipment was not new when it was installed. Some of the equipment is 80 years old!

4|12.J The DNFSB repeatedly writes up the existing facility as having significant safety issues!

5|13.0 It pays for itself in short order, with savings of $200+ Million/year. It's a no-brainer!

Alan James
713 Fox Dale Lane
Knoxville, TN 37934

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:
http://www.Y12sweis.com

Johnson, Pete

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WD014

[redacted]

From: pete johnson [pjohnso6@wowway.com]
Sent: Tuesday, November 17, 2009 3:08 PM
To: DIV.Y12SWEIS.Comments
Subject: Form Post from Firefox

firstName=pete
lastName=johnson
organization=
email=pjohnso6@wowway.com
address1=5682 great woods blvd
address2=
city=columbus
state=oh
zip=43231
country=usa
subject=Draft Y-12 SWEIS
1|14.0 comments=I am opposed to this nuclear plant

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Joyner, Ann

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WD108

[redacted]

From: Ann Joyner [anjoy1@verizon.net]
Sent: Friday, January 29, 2010 4:01 PM
To: DIV.Y12SWEIS.Comments
Subject: OREPA alternative 6

Attention Pam Gorman:

1|9.A We don't need or want nuclear bombs. The expense is unjustified wherever it is proposed they be manufactured. My husband and I have just today become aware of this possibility due to a letter in the Asheville newspaper. We would prefer OREPA alternative 6. From: Ann Joyner, Weaverville NC

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Kapa, Don

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WD071

[redacted]

From: Don Kapa [hotjpepper@gmail.com]
Sent: Friday, January 22, 2010 1:36 PM
To: DIV.Y12SWEIS.Comments
Subject: Oak Ridge Uranium Processing Facility

1|14.0 I was disappointed to learn that the US government continues to produce nuclear weapons.
I especially oppose the construction of the Y12 Nuclear Weapons Complex in Oak Ridge, TN.

2|10.D The price to build this complex is $3.5 million. I think spending this money on education, health research, and promoting peace would be a more prudent use of taxpayer funds.

As I learned of this proposal, I was reminded of a quote attributed to President U.S. Grant when he said after the end of the Civil War, " Let us have peace." After all these years, I think it's time for us to have peace.

Don Kapa

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Kavanaugh, John

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WD092

[redacted]

From: John Kavanaugh [johnkavanaugh1@yahoo.com]
Sent: Wednesday, January 27, 2010 7:01 PM
To: DIV.Y12SWEIS.Comments
Cc: KIM JOY BERGIER; Sigrid/Ron Dale; McClatchy News; Teresa Maxwell Kelly; D. BUKOWSKI; Nancy Pelosi; DEMOCRATIC PARTY; GREEN PARTY; REPUBLICAN PARTY; ACORN; Color of Change; United Farm Workers
Subject: COMMENT ON: PROPOSED $3.5 BILLION NEW URANIUM PROCESSING FACILITY:

Ms. Pam Gorman
Y-12 SWEIS Document Manager
Y-12 Site Office, Suite A-500
800 Oak Ridge Turnpike
Oak Ridge, TN 37830

Ms. Gorman:

The single constant that seems to run through all recent Presidential Administrations is a weapons policy that I consider insane.:

Former President Dwight Eisenhower phrased it as a "Military-Industrial Complex".

That phrase embodies actual people:

My guess would be that the present strain was begun when President Woodrow Wilson appointed Herbert Walker to supply the Pentagon.

Mr. Walker allied with his son-in-law, Prescott Bush, in forming a company, Brown Brothers (i.e. the "B" in present day HBR) in Germany prior to World War II. It has been pointed out that Brown Brothers came to the aid of Adolph Hitler at a point when that "gentleman(?)" was having some problem.

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Kavanaugh, John

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WD092

Brown Brothers was a part of the Harriman Empire. One of the Harriman's had set up shop in Russia. With Brown Brothers in Germany, the Harriman's, Walker, and Bush seemed set to make money off of the Second World War no matter which side won. And, indeed, the profits from that war were the base upon which the Bush family fortune was built.

I would suspect that the Bush family held onto their shares in Brown. So, I figure that the Bush family is still profiting from the wars they started.

There has been some talk recently (Daniel Ellsberg is one example) that we are now in a permanent state of war. That would not surprise me!

It did not surprise me, either, when George W. Bush spoke of putting Nuclear Weapons and radar equipment right at Russia's border. That is all the way within Russia's "area of influence."

By the same token, Russia could claim a right to place nuclear weapons in Venezuela and Cuba. We have no more right to "an area of influence" than Russia does. If we want to eliminate the safety valve of such cushions of nations between ourselves and other large powers we run the risk of our confusion of policies backfiring.

What bothers me is the vacillation of President Obama's policies: Moving back from Poland and Czechoslovakia with regard to nuclear weapons and radar equipment made a great deal of sense. His moving the weapons off

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Kavanaugh, John

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shore on ships was counter-productive to his earlier move. WD092

His reduction of weapons proposal is countered by the proposal of the new Uranium Processing Facility.

1|9.c **I get the impression that the hope embodied in the election of President Obama may be misplaced in the sense that it seems that the President no longer has the power to make decisions with regard to war and/or nuclear policy.**

The question no longer seems to be what the President wants to do. Rather, the question seems to revolve around what the President can be forced to do.

Some journalist asked if the ten thousand troops sent to Haiti are intended to be permanent. That would amount to another base in the Mexican Gulf. That would amount to reinforcing an "area of influence" we no longer claim.

More basic: Are we still a Democracy?

It seems that elections are either bought, won through suppression, or even decided by Judicial Coup.

As I understand it, John McCain was slated to "win(?)" up until about a week before the election; until Carl Rove was threatened with having to face a judge; until that computer guy conveniently ran out of gas flying from Columbus to Cleveland.

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Kavanaugh, John

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Between Republicans, kooks, and the Corporate Media: It looks like the Democrats and Obama are being set up to lose in 2010 and 2012. WD092

My bet is that the Bush family is pulling for Jeb!

2|14.0 **I SEE THE "Y 12 SWEIS" AS EVIDENCE OF ARROGANCE OVER-REACHING ITSELF!:**

MY RECOLLECTION OF THE GREEK CONCEPT OF THE CYCLE OF FATE MAY PORTEND THE CAT TRYING TO PLAY WITH ALL OF WE MICE TO A POINT WHERE THE CAT GETS CAUGHT UP IN THE CONFLAGRATION IT STARTED.

YOU KNOW HOW A SKITTISH CAT CAN KNOCK OVER A LANTERN ONTO THE HAY IN A BARN!

MY ONLY, PERHAPS MORBID, SATISFACTION IS KNOWING THAT THE SO-CALLED "MILITARY INDUSTRIAL COMPLEX" CANNOT KILL ALL OF U. S. WITHOUT COMMITTING SUICIDE!

John Kavanaugh

cc: A whole lot of folk.

PS: Sent blind copy to just under one hundred primarily activists, some friends, and a few family. jk

PPS: Anyone who wishes to unsubscribe from my e-mail lists may do so by sending me a clearly phrased request to that effect. jk

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Keeton, Ricky

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Office of County Mayor

MD019

Ricky A. Keeton
2845 Baker Highway
P.O. Box 180
Huntsville, TN 37756

(423) 663-2000
(423) 663-2355
Fax (423) 663-3803
scottexec@highland.net

November 18, 2009

Ms. Pam Gorman
Y-12 SWEIS Document Manager
Y-12 Site Office
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Dear Ms. Gorman,

1|13.0 I am writing to support the proposed Uranium Processing Facility (UPF) at the Y-12 National Security Complex in Oak Ridge. This facility will supplement the modernization initiative currently underway at Y-12. The draft Site-Wide Environmental Impact Statement (EIS) presents this as the preferred option from several alternatives.

1|13.0 (cont) Scott County has several people employed by the DOE and NNSA as part of the regional workforce. Our county and region have always been strong supporters of the Oak Ridge complex. Our region has always been responsive to the safe conduct of the operations associated with these missions. We are prepared to continue to invest in regional workforce development

2|3.B that is required for these operations. We do believe that Y-12's continued role should be conducted in modernized facilities with cost effective and safety focused processes. The preferred option of a new UPF achieves this objective.

Thank you for your consideration of these comments.

Best Regards,

Ricky A. Keeton

Ricky A. Keeton
Scott County Mayor

Kelley, Marylia

Page 1 of 2

WD003

[redacted]

From: Marylia Kelley [marylia@earthlink.net]
Sent: Friday, October 30, 2009 1:34 PM
To: DIV.Y12SWEIS.Comments
Subject: Y-12 Draft SWEIS initial comment

Dear DOE NNSA:

I have just received notice of the public comment period for the Y-12 Draft Site Wide Environmental Impact Statement. I have left a message on the document manager's phone line requesting a full copy of the Draft SWEIS.

This initial comment is regarding the lenght of the public comment period.
I see that it is presently set to expire on January 4, 2010. This means that the public comment period runs through numerous holidays - Thanksgiving, Christmas/Channukah/Kwanza (etc.) and New Years.

I am the Executive Director of Tri-Valley CAREs in Livermore, CA. I would like to prepare detailed, thoughtful comments on the Y-12 draft SWEIS.

In order to do so, and to simultaneously conduct other Tri-Valley CAREs activities and enjoy family holidays, I will need addtional time, i.e., an extension of the public comment period.

I believe that my situation is not unique.

As I have yet to receive the full document, I cannot tell you in this initial comment how many pages it contains. But, you already know that. I suspect that the answer is that the draft SWEIS is long, dense and cumbersome -- as are all NNSA draft SWEIS documents that I have read over the years.

1|2.B

I point this out because as a member of the public who intends to offer comments, I want to emphasize the time commitment that commenting requires.

Further, the decisions that are to be made in the Y-12 draft SWEIS are among the most important that our Nation will make in the coming years.
Thus, the draft document should be read and considered carefully by commentors, not skimmed like a romance novel (as I am sure you will agree).

For these reasons, on behalf of Tri-Valley CAREs, I formally request an extension of the public comment period through the end of January.

Moreover, on behalf our our colleagues, friends and group members in and around TN, I ask you to also extend the period of time between the release of the draft (which many folks have yet to receive) and the public hearings.

I have already heard from some people in and around TN that they had been assured of a 30-day period between the release of the draft SWEIS and the first public hearing (and also that they had been told there would be a 90-day public comment period overall).

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Kelley, Marylia

Page 2 of 2

1|2.B (cont) I am confident that you will receive more - and more thoughtful and complete - comments if you extend WD003 the public response times. To do less hinders the public's ability to adequately comment under NEPA.

Thank you for your consideration of this important public issue. Please let me know the duration of any extension.

And, please expedite the mailing of the full document to the address I left on the document manager's voice mail, and which also follows my signature below.

Sincerely,

Marylia Kelley,
Tri-Valley CAREs

Marylia Kelley,
Executive Director

Tri-Valley CAREs
2582 Old First Street
Livermore, CA, USA 94551

Ph: (925) 443-7148
Fx: (925) 443-0177
Web: www.trivalleycares.org
Email: marylia@trivalleycares.org or marylia@earthlink.net

"Stopping nuclear weapons where they start..."

Kelley, Marylia

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MD059

Tri-Valley CAREs
Communities Against a Radioactive Environment
2582 Old First Street, Livermore, CA 94551 • (925) 443-7148 • www.trivalleycares.org

Peace Justice Environment since 1983

January 29, 2010

Pam Gorman
Y-12 SWEIS Document Manager
Y-12 Site Office
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Re: Comments on Draft Site-wide Environmental Impact Statement for the Y-12 National Security Complex (DOE/EIS-0387) (Draft Y-12 SWEIS)

Dear Ms. Pam Gorman,

Tri-Valley CAREs (TVC) is a non-profit organization founded in 1983 by Livermore, California area residents to research and conduct public education and advocacy regarding the potential environmental, health and proliferation impacts of the Department of Energy (DOE) nuclear weapons complex, including the nearby Lawrence Livermore National Laboratory.

Since its inception, TVC has participated in numerous National Environmental Policy Act (NEPA) administrative review processes involving the nuclear weapons complex, including Y-12. The group has also participated in federal litigation to uphold NEPA at Y-12 and other sites in the DOE National Nuclear Security Administration (NNSA) complex.

Due to concerns in our community about the implications of increasing the US nuclear weapon production capabilities, TVC submits the following comments on the Draft Site-wide Environmental Impact Statement (SWEIS) for the Y-12 National Security Complex (Y-12) at Oak Ridge, Tennessee.

There is a recognized need to increase the security and safety at Y-12, which has long been the NNSA's primary site for enriched uranium (EU) processing and storage. This stated purpose of this (SWEIS) is to analyze the potential environmental impacts of alternatives for ongoing and foreseeable future operations, facilities, and activities at Y-12. However, the document is limited almost exclusively to analyzing just one large construction project at Y-12, the Uranium Processing Facility (UPF). Though over $100 million dollars has been earmarked for upgrading existing facilities at Y-12 through 2018, this SWEIS focuses all attention on justifying a UPF to enable the production of uranium secondaries and cases. We note the "preferred alternative" would build an oversized, unneeded and wrongly-missioned UPF to produce 50/80 nuclear weapons' secondaries and cases annually. 1|3.B

This draft SWEIS document lacks sufficient analysis in a number of ways described below.

Kelley, Marylia

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I. Lack of need for a UPF.

The Obama Administration has communicated to the world that the US will be taking a leadership role in nuclear disarmament through various means, including shrinking the US nuclear weapons arsenal. In his April 2009 speech in Prague, President Obama declared the US will show global leadership in getting to zero nuclear weapons. In September 2009, the US presented a UN resolution, adopted by the security council, which calls on nuclear weapons states to renew their efforts to meet their obligation (in the Non-Proliferation Treaty) to "pursue in good faith…disarmament at an early date." It is also estimated that the follow on agreement to the START Treaty with Russia will reduce the US stockpile to 1,675 strategic nuclear warheads; when President Obama announced this, he also said it was the starting point for deeper cuts. It is clearly foreseeable that the size of the US stockpile will be going down in both the near and long term future.

Currently, the US has a safe, secure, reliable stockpile. Since 1996, more than $90 billion has been spent on so called Stockpile Stewardship activities. By 2018 the US stockpile of refurbished "Life Extended" warheads will exceed the maximum foreseen in the new START Treaty. Yet if one includes all of the nuclear weapons in the US stockpile that have been refurbished since the late 1980s, by 2012 we will have 1,786 warheads of recent vintage and by 2018 that number will have grown to 2,986, and that is without a UPF or Chemistry and Metallurgy Research Replacement (**CMRR**) Nuclear Facility at Los Alamos National Lab.

With nearly 3000 nuclear weapons in the stockpile already refurbished by the time the UPF is constructed (2018), the need for a UPF of the scale proposed in the Preferred Alternative, or even one of the size proposed in the No Net Capability Alternative clearly does not exist.

2|3.b

Additionally, the existing facilities at Y-12 are already being upgraded to meet health, safety, security and environmental standards whether a new UPF is built or not. More than $100 million will be spent on upgrades to existing facilities between now and 2018. These upgrades will not expire and ensure that the existing facilities can maintain the stockpile through 2018, giving ample time to allow for the planned reductions in the stockpile to become a reality. Indeed, those reductions should be the basis for planning the future of Y-12, as we will describe below. Instead, NNSA offers only production based alternatives.

It has repeatedly been found by the JASON and others that narrowly defined, careful surveillance and evaluation of the existing arsenal is sufficient (and essential) to assure its safety, security and reliability, as it awaits dismantlement.

3|1.a

These narrowly defined maintenance activities can be performed in existing facilities. For example, consolidating operations in a down-sized, upgraded existing facility (capable of performing 10 or fewer assessments a year, a number considered "reasonable" in the draft SWEIS) could provide mission confidence and send a powerful signal to the rest of the world that the US is not investing enormous amounts of money in new production capability.

Moreover, the draft SWEIS does not distinguish between the equipment "needs" for dismantlement of nuclear weapon secondaries at Y-12 and the equipment "needs" for their production, including the production of new and modified designs. While there is some crossover or dual use, it is nonetheless true that one can draw a line between equipment for dismantlement and equipment fo production. They are not the same from a technical perspective. They are not the same from a NEPA

4|9.d

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Kelley, Marylia

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compliance perspective. Further, the people of the US and the world can and do distinguish between disarmament and dismantlement of nuclear weapons and producing new ones. They are not the same in terms of policy and political impacts.

4|9.d cont.

The draft SWEIS is fatally flawed by its willful refusal to substantively distinguish between these two different activities (production and dismantlement). All of the UPF options presented, including the "preferred alternative" fail to analyze a dismantlement-missioned UPF and distinguish it from the production oriented UPF options. Thus, the alleged alternatives in the draft SWEIS are reduced to being mere variations on the same production theme with only a marginal difference in square footage between them.

II. Improper segmentation/ failure to analyze cumulative impacts.

This project is connected to the already completed HEUMF, both physically and in terms of its environmental impacts. In addition the Consolidated Manufacturing Complex (CMC) that is planned for the near term future at Y-12 will also be linked to these facilities. The DOE is required by NEPA to analyze connected actions together in one Environmental Impact Statement. By improperly segmenting the HEU storage (HEUMF), HEU processing (UPF), and the "production operation zone" upgrades, (which are envisioned as developing into a small complex or possibly a CMC) the required "hard look" at the cumulative impacts of these facilities together is avoided. Pursuant to the CEQ's NEPA regulations, "'Cumulative impact' is the impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency or person undertakes such other actions." 40 C.F.R. §1508.7. The cumulative impacts section of the draft SWEIS unreasonably fails to include a look at the connected impacts of the three facilities in one NEPA review document.

While, ideally the cumulative impacts of the three projects should have been analyzed in the NEPA review for the HEUMF before any action was taken, a comprehensive "hard look" at their cumulative impacts should be taken in this SWEIS. Clearly additional information about the CMC will need to be developed and included for this analysis to meet NEPA's statutory requirements.

5|12.n

Additionally, the "preferred alternative" in this Draft SWEIS suggests that the UPF should produce 50/80 secondaries and cases per year, a figure that matches the number of pits to be produced in the preferred alternative for the proposed CMRR. These two projects are inextricably linked in that, together, they will produce the physics packages for nuclear weapons in the US arsenal. It is no coincidence that the CMRR project proposes this same 50/80 figure. Due to the connected nature of the projects, there should be an analysis into the cumulative impacts of the projects together, specifically regarding the proliferation and environmental contamination that these projects will cause.

III. Failure to adequately prepare for upcoming nuclear posture review.

The Draft SWEIS relies on the 2001 Nuclear Posture Review (NPR) as a principal national security policy for guidance on nuclear weapons policy. The draft SWEIS states conclusively that to achieve the goals in support of the Nuclear Posture Review of 2001, the continued operation of a facility such as Y-12 is necessary. However, the draft SWEIS fails to take into account the anticipated changes that will be implemented in the new NPR (due in March 2010). Drafting a SWEIS that relies on a document that, given the new administrations disarmament positions, is expected to drastically change in the upcoming months is unreasonable. The new NPR will provide guidance on the new nuclear weapons policy and as such, NNSA should not issue a draft SWEIS for public comment that relies

6|1.a

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Kelley, Marylia

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entirely on national security policies that are likely to be rendered irrelevant in the near future, let alone in 2018 when the UPF is set to open.

The Y12 SWEIS has no urgent driver that compels a decision prior to the release of the NPR in march and the Non-Proliferation Treaty (NPT) Review Conference in May, since NNSA confirms that work is being done safely and responsibly now. Both the NPR and the NPT, along with the START follow on agreement and other measures are expected to clarify the nuclear terrain and will redefine "mission requirements" across the nuclear weapons complex, including at Y-12.

6|1.a cont.

The Congressional Bipartisan Commission on US Strategic Nuclear Posture said as much, as the SWEIS notes: delaying the process to allow clarification will allow for a better decision. Further, it will permit the public to better comment on alternatives.

In order to be timely and reasonable, the draft SWEIS should proceed on the basis of the 2010 NPR and its force structure, and the SWEIS should not proceed with a decision on the UPF based on an insider guess, however educated, when waiting six more months (after a four year delay) will offer significantly more certainty about the future.

Building a new bomb production plant now will corrupt President Obama's overall vision and negate any gains we might hope to make in nonproliferation efforts through the START follow on agreement, the Comprehensive Test Ban Treaty ratification, the NPT Review, or a Fissile Materials Cutoff Treaty, among other measures being considered.

The US is expending huge amounts of political capital to try to constrain the worldwide spread of nuclear weapons. Building a new bomb production plant will undermine these efforts to establish credibility on nonproliferation on the global stage.

7|1.e

It is not overreaching to say that building a new bomb plant in Y-12 will likely trigger nuclear proliferation in nations that believe they need to protect themselves from possible US aggression. At a minimum it will stymie progress toward a safer and more peaceful world without nuclear weapons.

A policy which attempts to discourage other nations from pursuit of nuclear capability while expanding our own capacity to proliferate our own arsenal is duplicitous and inconsistent.

IV. The analysis of the "preferred alternative" fails and is inadequate

The stated "preferred alternative" of the NNSA is the 'Capability-Sized UPF Alternative'. This veiled attempt to split the difference (between the full scale 125 warhead per year UPF and the No-Net Capability UPF alternatives) is not adequately analyzed in this SWEIS and fails on several counts:

• Building new production facilities with a 50-80 warhead/year capacity will be a provocative act that undermines US moral standing and credibility and, more practically, negates our nonproliferation efforts.

8|7.b

• Little detail is given to support the need for the production figures of the Capability-Sized UPF, nor is there any discussion of the fact that the "preferred alternative" here for new secondaries equals the production level for new pits at the CMRR nuclear facility and what the implication of that are for international nuclear proliferation.

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Kelley, Marylia

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• Building a Capability-Sized UPF when the demand for production capacity is expected to decline to near-zero in the next decade is unacceptably wasteful. By the time any production facility is completed, it will no longer be needed, as US stockpile levels will, by treaty commitments, have declined to a level below that of the current Life Extended stockpile.

9|3.a

• Building a Capability-Sized UPF will require an investment in expensive technology that will cost Oak Ridge workers jobs and, ultimately, prove to be a waste as the demand for production operations diminishes and then disappears.

• The only conceivable motive for building a Capability-Sized UPF is transparent to other nuclear weapons, nuclear-capable, and nuclear wannabe states: to maintain an enduring nuclear arsenal far into the future and to pursue production of new or modified warhead designs.

• There is no reasonable or rational scenario under which a throughput capacity of 50-80 warheads/year would be required to maintain our current stockpile in its present safe, secure and reliable status.

• The draft SWEIS does not adequately provide information to support the square footage requirements asserted for the space in the preferred alternative, what amount of the UPF would be used for what stated purpose and what amount of the facility is set aside for future purposes. This failure to adequately describe space requirements for the individual operational requirements of UPF violates NEPA and prevents the public, elected officials and decision makers from their ability to comment on the analysis. A much more detailed and thorough description of space requirements for the each purpose of the project, the amount of space set aside for future purposes and other information relevant to analyzing the adequacy of the size and scale of the facility proposed in the preferred alternative is required by law.

10|7.c

V. Failure to analyze the impacts of increased uranium mining that would be necessary to meet the preferred alternative's uranium needs.

The exploration and mining of uranium causes significant destruction to the environment. Yet, the draft SWEIS fails to include an analysis of the environmental impacts that the increased demand caused by the "preferred alternative's" 50/80 secondaries a year production level will have on the sure to follow increase in uranium exploration and mining. The DOE already exerts significant pressures on ecosystems around the United States where there is uranium speculation, including a 42-square-mile uranium leasing program that threatens water and wildlife in the Dolores and San Miguel rivers in western Colorado and eastern Utah.

11|16.b

NEPA requires the indirect cumulative impacts of an action be analyzed in an EIS. Cumulative Impacts include indirect effects, which are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable. Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems. CEQ 1508.8(b). The increase in uranium exploration and mining caused by the preferred alternative are an indirect cumulative impact of the facility that must be fully analyzed in the SWEIS.

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Kelley, Marylia

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VI. Failure to adequately analyze special needs for likely increase in dismantlements above 2009 levels.

12|9.d The future of Oak Ridge must include the dismantling of many thousands of nuclear weapons. Because this part of Y12's mission has been largely neglected for decades, there is a 12-15 year backlog of retired secondaries and subassemblies awaiting dismantlement and disposition. The backlog is large enough to create storage issues and, on more than one occasion, criticality safety violations, yet the dismantlement responsibility goes largely unmentioned in the Y-12 draft SWEIS.

Y12 projects future dismantlement at a steady rate—but this is not enough to meet the country's needs and certainly not enough to persuade other nations we are aggressively acting to reduce our stockpile and meet our obligations under the NPT.

13.9b Y12 should establish the capability to more than double its throughput for dismantling nuclear weapons; a dedicated, single-use facility, with security, safeguards, and transparency designed in, should be constructed, in either a renovated or new building. A full assessment of dismantlement facilities and realistic future projections of dismantlement demand should be conducted as part of the SWEIS for Y12.

12|9.d cont. The SWEIS's treatment of the UPF fails to give exact figures and details about the extent of the dismantlement work that can be done under any of the alternatives, including the extent of the floor space, if any, that will be designated to dismantlement under each alternative and the number of dismantlements that can be accomplished under any of the alternatives.

VII. Failure to adequately analyze costs.

14|10.c The SWEIS does not provide sufficient cost figures for the alternatives for regulators and decision makers to make comparisons. The price tag for a new, full-blown UPF is $3.5 billion. The price tag for the NNSA's preferred alternative, a "Capability-Sized UPF," which is 10% smaller than the full-size UPF, would likely approach $3 billion. Even the "No Net Production" Alternative proposes a near-full size facility (same as Capacity-Size UPF).

It is irresponsible to spend billions on a bomb plant which, by the time it is completed in 2018, should no longer be needed due to forecasted weapons reductions. This is especially true considering that the existing facilities at Y12 will be upgraded to meet health, safety, security and environmental standards, whether a new UPF is built or not. Already, more than $100 million is to be spent on upgrades to existing facilities between now and 2018; however it goes unmentioned in the draft SWEIS.

15|9.b A full assessment of dismantlement facilities and realistic future projections of dismantlement demand should be conducted and a responsible decision reached about the wisdom of building a dedicated single-purpose dismantlement facility in conjunction with the Highly Enriched Uranium Materials Facility already nearing completion.

16|10.c In addition, the recent GAO Report to the House Subcommittee on Energy and Water Development, Committee on Appropriations entitled 'Actions Needed to Develop High-Quality Cost Estimates for Construction and Environmental Cleanup Projects' assessed the Cost-Estimating Criteria for the UPF and found that the NNSA did not meet the standards for credibility and used improper estimations for the "foundation for the cost estimate" for the facility that was submitted to Congress.

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Kelley, Marylia

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16|10.c cont. Beyond just the costs associated with the UPF the SWEIS fails to analyze other site plans, including the costs of maintaining current facilities at Y-12 in a "ready-to-use" state as proposed in the "preferred alternative."

VIII. Failure to adequately consider environmental risks posed by lithium and other hazardous materials used in Y12 operations.

The draft SWEIS mentions lithium in numerous places but neglects to detail the forms in which it is used and the attendant environmental risks. Lithium hydride, for example, is "extremely hazardous" to health (requiring full protective suits); it is flammable, and reactive. In particular, it reacts violently with water (including human perspiration).

17|12.m.2 In general, lithium is corrosive to the eyes, the skin and the respiratory tract. It is corrosive on ingestion. Inhalation may cause lung oedema. Lithium may spontaneously ignite on contact with air when finely dispersed. Upon heating, toxic fumes are formed. It reacts violently with strong oxidants, acids and many compounds (hydrocarbons, halogens, halons, concrete, sand and asbestos) causing fire and explosion hazard. Lithium in various forms reacts violently with water, as noted.

Because little was said about it in the draft SWEIS, it is impossible to comment more fully on the specific hazards posed by lithium at Y-12 and how to mitigate them. We note, however, that the weapons activities at Y-12 that would use lithium generally would present all of the above-listed hazards. Therefore, a more complete analysis of lithium risks and mitigation measures must be included in the SWEIS. In this context, we note also the failure to include other hazardous materials used at Y-12 in this draft SWEIS.

IX. Failure to adequately analyze and prioritize cleanup of existing contamination.

18|12.0 In its February 2001 comment, Tri-Valley CAREs urged DOE to prioritize environmental justice and the cleanup of polluted areas near the Y-12 site in its SWEIS, including contamination around the community of Scarboro. The draft SWEIS does not comply. Thus, we repeat that comment here. Additionally, we have learned of other areas around Y-12 that are known or suspected of being contaminated. Groundwater to the west and east, and aquifers below Y-12 have reportedly been contaminated by radionuclides, metals, and hazardous chemicals such as TCE.

The draft SWEIS fails to adequately analyze the existing contamination and then compounds the failure by not properly prioritizing cleanup in considering the future of Y-12. Cleanup and dismantlement of secondaries are examples of two crucially important (and reasonable) future missions for Y-12 that must receive a more detailed consideration than given in the draft SWEIS.

X. Failure to adequately and appropriately describe security considerations in a manner that would allow public comment.

19|11.d The effects on the population surrounding Y-12 of a terrorist detonating an improvised nuclear device would be devastating. At the request of the Project on Government Oversight, the Natural Resources Defense Council (NRDC) performed a simulation of the effects of a 10-kiloton nuclear explosion at the approximate location of the HEU storage site at Y-12. NRDC's calculation concluded that the detonation of an improvised nuclear device at Y-12 could cause over 60,000 casualties, including nearly 5,000 fatalities, if the detonation occurred during the day. Casualties were calculated based on the residential population only. That does not include the 13,000 workers at Y-12 and ORNL,

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who would be killed immediately. The total number of fatalities would likely be about 18,000 people. Because a disaster scenario of this magnitude at Y-12 exists, a thorough analysis of the terrorism risk in for any new actions at Y-12 should be includes in the action's NEPA review.

In order for interested stakeholders to "take a hard look" at the safety and security of the new UPF and the significant changes and reduction to the high-security area and overall security that the project proposes, the SWEIS must make enough disclosures to enable interested stakeholders of information to "take a hard look" at the safety and security of the new project in the context of the overall facility.

19|11.d cont.

However, the analysis of terrorism risks in the SWEIS relegates much of this information into a classified summary. An unclassified or declassified summary that particularly includes information regarding the potential health impacts and other information that does not disclose access or other security vulnerabilities must be made available for public review. It is neither appropriate nor legally adequate to tack on a classified appendix without first carefully analyzing what information can and should be disclosed in the body of the SWEIS. For example, an analysis of the risks to workers and nearby populations in the event of a terrorist attack can be accomplished without revealing specific security vulnerabilities. NEPA is a procedural statute, intended to inform elected officials, other stakeholders and the public and to involve them in decisions. Here, public comment on the risks and on possible mitigation measures to address the risks is stymied by excessive classification. This must be remedied.

XI. Failure to include a reasonable range of Alternatives.

a. Moving uranium processing activities into the HEUMF rather than constructing a stand-alone UPF.

Another reasonable alternative is the possibility of moving small-scale uranium processing activities, or a portion of thereof, into the existing HEUMF. Regarding production, it is reasonable to analyze whether the floor space needed for an annual throughput of approximately 5 secondaries a year, which is sufficient to provide assurances of the safety, security and reliability of the stockpile as it awaits dismantlement, is available in the large and already constructed HEUMF. The draft SWEIS goes into great detail to describe the rational for placing the UPF in close proximity to the HEUMF, thus it is reasonable to examine the impacts of downsizing, re-missioning to dismantlement (as opposed to production) and constructing it into the existing building.

20|9.f

b. Alternative 6, the Curatorship Alternative

A reasonable Curatorship alternative should be added to the SWEIS. This Curatorship alternative would analyze management of the nuclear weapons stockpile to assure its existing safety, security and reliability. The implications for the Y-12 SWEIS include that a Curatorship alternative could reasonably be performed in a down-sized facility at Y12, with major activities reoriented to enhance surveillance and evaluation as well as dismantlements. The Y-12 facilities, under Curatorship, would not focus on producing new and modified secondaries (as is the case with the alternatives in the draft SWEIS). Under Curatorship, parts are replaced only if the safety or reliability of the weapon is compromised by the part's degradation (usually called an "actionable defect"). In such cases, parts are remanufactured as close to the original specifications as possible. Adding "new" and "modified" designs is avoided. In this regard, we note that the capacity to produce new and modified designs for secondaries and cases is central to the alternatives in the draft SWEIS, and to the "preferred alternative" in particular. Thus, the

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Curatorship alternative is a truly different, albeit reasonable, approach. Included in a Curatorship alternative would be a new dismantlement area, with designed-in safeguards and appropriate transparency per foreseeable treaty requirements. To offer some parameters showing how the Curatorship alternative should be analyzed in the SWEIS, we provide the following details explicating this approach:

21|9.a cont.

The Curatorship Path and Why it is a Reasonable and Better Alternative for Maintaining the Nuclear Weapons Stockpile as it Awaits Dismantlement

In 1992, the U.S. Congress cut off funding for nuclear test explosions unless certain conditions were met. This led the United States into negotiations on a Comprehensive Test Ban Treaty and an immediate moratorium on underground testing of nuclear weapons, which continues today. In 1993, Congress directed NNSA's predecessor, DOE's Office of Defense Programs to initiate a modest program, called "Stockpile Stewardship," for maintaining nuclear warheads in the absence of testing. Fearful that its traditional nuclear weapons research programs, which were heavily tied to testing and development of new warheads, would be cut drastically, Defense Programs defined Stockpile Stewardship as requiring it to replace nuclear testing with the enormously technically challenging goal of using computers to model precisely the behavior of exploding nuclear weapons. This new goal required vast new experimental and computational capabilities. As a result, rather than experiencing serious post Cold-War consolidation and funding cuts, the Defense Programs/NNSA weapons R &D complex actually prospered. Appropriations for nuclear weapons activities soared, from a low of $3.2 billion in 1995 to over $6.6 billion in FY 2005. While the growth has flattened out, NNSA spending on the activities and facilities of the nuclear weapons complex remains around $6.4 billion per year.

While it has been enormously costly, NNSA has made considerable progress in its efforts to model nuclear weapons explosions. NNSA now claims its modeling and simulation capabilities are sufficient not only to maintain existing weapons, but also to design and certify certain new nuclear weapons, without underground nuclear testing.

There is a fatal flaw in this strategy. The more confident the weapons labs have become in their modeling capabilities, the more they have been tempted to modify the nuclear weapons in the stockpile. However, computer simulations cannot provide the same level of confidence in modified warheads that was provided for the original warheads through full-scale nuclear tests. Over time, if changes continue to be introduced into warheads, the level of confidence in the stockpile will inevitably diminish. NNSA officials themselves have repeatedly stated their concern that as changes accumulate in existing warheads, it will become increasingly difficult for the laboratories to certify their performance. However, instead of adopting a policy and process to scrupulously avoid changes, NNSA proposed designing a completely new, so-called "Reliable Replacement Warhead" (RRW), which would only compound the problem. Without nuclear testing, questions will always remain about the performance of any new warhead, particularly one that is outside of the existing "design envelope" of test-proven designs. Furthermore, designing and producing a new warhead is a provocative act that runs counter to U.S. commitments under the NPT.

We recommend a more conservative approach to maintaining the existing test-certified stockpile, which is based on adhering to the original design parameters and characteristics of the nuclear explosive package. A key to this approach is our conclusion that there is no need for the United States to design any new nuclear weapons or to make performance or safety-enhancing modifications to existing ones. Presidents Clinton and Bush, on the advice of their Secretaries of Defense and Energy, have repeatedly certified that the nuclear weapons in the current stockpile are safe and reliable. We would continue and

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strengthen that record by ensuring that those safe and reliable warheads are not changed in any way unless there is a well documented finding that corrective action is needed to fix a component or condition that could significantly degrade the performance or safety of the warhead and that no compensating measures are feasible.

22|9.a We call our methodology "Curatorship." Just as a museum curator maintains artistic treasures and occasionally restores them to their original condition, so too would NNSA and DoD maintain nuclear weapons to their original design and condition, with occasional restorations. NNSA's role in maintaining nuclear weapons would focus on scrupulous surveillance and examination of warheads to determine if any component has changed in any manner that might degrade the safety or performance of the warhead. If so, it would restore that part as closely as possible to its original condition when the warhead was first certified to enter the stockpile. If that were not possible, NNSA could craft a replacement part conforming as closely as possible to the performance specifications of the original component. With changes to warheads strictly controlled, confidence in the performance of the remaining warheads would be higher than under Stockpile Stewardship, but the financial cost and the loss of international credibility regarding nuclear proliferation would be much lower under Curatorship.

No New Nuclear Weapons or Changes to Existing Ones

The current U.S. nuclear weapons stockpile is diverse, resilient, and more than sufficient for any conceivable nuclear deterrent mission. Its broad range of capabilities could be preserved in our proposed 500-warhead stockpile. Depending on which weapons the Government chooses to keep, a 500-warhead stockpile could include as many as seven types of strategic warheads and four kinds of delivery vehicles -- land-based ballistic missiles; submarine-based ballistic missiles; aircraft; and cruise missiles. Such a stockpile would retain considerable flexibility for responding to new security demands should they arise. Warheads in the current stockpile have explosive yields that vary from 0.3 kilotons to 1,200 kilotons. None of that diversity need be lost at the 500-warhead level, but on cost-effectiveness grounds, some reduction in the number of warhead types retained in the stockpile may well be warranted. U.S. nuclear warheads can explode at various heights above the ground, on impact with the ground, with a delay after ground impact, and even after penetrating several feet into the ground to attack underground bunkers. With the exception of an improved earth-penetrating warhead, which Congress has emphatically rejected, the Defense Department has not identified any new capability that it proposes to add to the existing stockpile.

It is impossible to conclude categorically that there will never be any new threat against which a new type of nuclear weapon might be useful. However, in a time when there is a political imperative for the U.S. and other nuclear nations to devalue nuclear weapons, as a precursor to their eventual elimination, it is very difficult to foresee a new threat that would compel the U.S. to respond by designing a new nuclear weapon. The Curatorship approach would not preclude designing a new warhead, should the President and the Congress decide to do so in the future. Rather, it would suspend
23|9.a research on new nuclear weapons technologies and efforts to develop new warheads, pending identification of a new threat justifying such activities.

Existing U.S. nuclear weapons are extremely safe, secure, and reliable. An accidental nuclear explosion of a U.S. weapon is precluded by its inherent design. To initiate a nuclear explosion, the chemical high explosive, which surrounds the weapon's plutonium pit, must first explode and compact the pit in a highly symmetrical manner. This requires the explosive to detonate in at least two specific places simultaneously. All U.S. nuclear weapons are certified to be "one-point safe." One-point safe

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means that if the chemical explosive were accidentally detonated, at the worst possible place, there would be no nuclear yield greater than the equivalent of two kilograms of high explosive. Designers conducted numerous underground tests of one-point safety in which they detonated weapons at their most sensitive points under a variety of conditions. Over the past decade, the weapons labs have repeatedly checked and verified the one-point safety of U.S. warheads using the modeling and simulation methods developed in the Stockpile Stewardship program. Even if a projectile is shot into a nuclear weapon or some other shock to the system initiates a chemical explosion, it is exceedingly unlikely that there would be any nuclear explosion.

The chemical explosive in most types of U.S. nuclear weapons is so-called "Insensitive High Explosive" (IHE). IHE can withstand severe shocks without exploding, which lowers the risk that a chemical explosion might disperse plutonium and other hazardous materials over a wide area. The only U.S. nuclear warheads without IHE are the W-76 and W-88 warheads on submarine-launched ballistic missiles (SLBM), and the W-78 on Minuteman III ICBMs. Little would be gained by redesigning those warheads to function with IHE. The SLBMs use a very energetic propellant, which is relatively easy to detonate. Any accident that causes the missile propellant to detonate would likely break the warhead apart and scatter plutonium, regardless of whether the warhead contains IHE. All W-78s could easily be replaced by the more modern W-87, which has IHE, as the stockpile is reduced in size. Furthermore, procedural changes, including the removal of all nuclear weapons from aircraft in peacetime and loading/unloading missiles without their warheads mounted aboard, have significantly reduced the risk from warheads that lack the most modern safety features.

24|9.a Proponents of developing new warheads have claimed that over time, as nuclear warheads age, their safety and reliability might degrade. However, safety can only improve with age. Extensive tests have shown that the chemical high explosive becomes more stable and predictable as it ages, further reducing the risk of accidental explosions. Surprisingly, key measures of performance, such as detonation-front velocities have also been shown to improve systematically with age.[1]

To prevent accidental or unauthorized initiation of a weapon's normal firing systems, U.S. nuclear weapons have so-called enhanced nuclear detonation safety (ENDS) systems. The ENDS system typically includes at least one "weak link" and two "strong links." All of them must be closed in order to arm and fire the warhead. The weak link is normally closed, but is designed to fail (open), like a circuit breaker, and prevent power from reaching the detonators in an abnormal environment, such as lightening, fire, or physical shock. The strong links generally isolate the systems that arm the warhead and fire the detonators from their power sources using devices such as motorized switches or mechanisms that physically interfere with the implosion until the proper arming sequence is followed. One strong link, called a Permissive Action Link (PAL), requires that the weapon receive properly coded electronic signals. Two different codes must be received simultaneously. This is the "two man rule," which ensures that an individual acting alone cannot arm a nuclear weapon. The other strong link can be closed only by a particular environmental event or sequence of events that would occur during the normal delivery of the warhead. Such events may be a deceleration force, a temperature, or a pressure that would normally occur only during delivery. Thus, if terrorists were somehow to obtain a U.S. nuclear warhead, they could not detonate it without first making complex internal adjustments. In the unlikely event that the terrorists were capable of making the necessary adjustments, the time required would provide a substantial opportunity for the U.S. to recover or destroy the weapon.

[1] "Science-Based Stockpile Stewardship," Dr. Raymond Jeanloz, Physics Today, December 2000, p. 5, www.physicstoday.org/pt/vol-53/iss-12/p44.html

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Even though nuclear weapons are extremely safe and secure, it is possible to do even better. The NNSA and the Department of Defense can and should make additional operational improvements in how nuclear weapons are handled and protected that would improve their safety and security. One significant measure would be to reduce the alert status under which the military maintains many nuclear weapons. If the alert status were reduced, the frequency of handling live weapons, including loading, unloading, and transporting them would be greatly reduced as would the opportunities for their exposure to accidents or hostile actions. And obviously, other things being equal, the fewer nuclear weapons there are, the less chance there is of a safety or security lapse.

25|9.a

Proponents of weapons development claim that they can design and fabricate new warheads that would be safer and more secure than existing weapons. That may be true, but the relevant question is whether the marginal improvements to safety and security, which NNSA may make through design changes, are worth the substantial negative effects that weapons development programs have on our national security. It is also worth noting that new warheads may just as well wind up being less safe and reliable than existing warheads. Designing and building new nuclear warheads without testing them is risky, even with the sophisticated models of the Stockpile Stewardship Program. As Hoover Institution fellow, Sidney Drell, and former U.S. Ambassador, James E. Goodby, have stated, "It takes an extraordinary flight of imagination to postulate a modern new arsenal composed of such untested designs that would be more reliable, safe, and effective than the current U.S. arsenal based on more than 1,000 tests since 1945."[2]

The latest argument from weapons designers is that we need to improve the "surety" of existing weapons. Surety is a single word that incorporates the safety, security, and control of nuclear weapons. Proposals that strive for near absolute surety designed into the weapon itself should be viewed with deep skepticism. We believe that surety is simply the justification *du jour* for more weapons development. Built-in surety mechanisms, such as a mechanism to destroy a warhead remotely on command, may have potential utility in some very low probability theft scenarios. On the other hand, they may have a higher probability for affecting the pit implosion process in unexpected ways. Such new systems could severely degrade confidence in reliability. Arguably, only a full-scale nuclear test could truly resolve confidence issues regarding some built-in surety measures. Moreover, when it comes to keeping U.S. nuclear weapons secure, there will always be a need for "guards, guns and gates" that should never be qualitatively diminished (although we do hope to dramatically lower security costs by having far fewer nuclear weapons and storage sites, less separated fissile material, and smaller areas to guard). Furthermore, development of new and potentially improved warheads, whether the improvement is limited to surety or includes new yields and missions, is counter to U.S. non-proliferation goals.

26|9.a

Behind the superficially appealing promise of higher levels of nuclear warhead "surety" lies a thinly disguised effort by weapons advocates to circumvent obligations inherent in the NPT and the CTBT to abandon the technological competition in nuclear armaments. Improved "surety" is but one of several technological trap doors leading to reinvigoration of the nuclear arms race, which would restore prestige and resources to the nuclear weapons laboratories, but only at the cost of diminishing national and international security.

[2] "What are Nuclear Weapons For? Recommendations for Restructuring U.S. Strategic Nuclear Forces," Sidney Drell and James Goodby, an Arms Control Association Report, October 2007, p. 20.

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How Would Curatorship Differ From Stockpile Stewardship?

Curatorship would fundamentally change how the weapons laboratories go about their business. The biggest difference would be that the numerous changes that NNSA makes to nuclear weapons each year would be strictly limited.

A key activity for maintaining nuclear weapons under Stockpile Stewardship is the so-called Life-Extension Program (LEP). NNSA, in cooperation with the DoD, has taken an aggressive approach to LEPs. In practice, "life extension" has become a misnomer for nearly complete rebuild and upgrade of a warhead system that is nowhere near the end of its life. Under the Life Extension Program, NNSA and DoD have jointly reexamined the performance features, specifically military characteristics and stockpile-to-target sequence requirements, of almost all U.S. weapons designs and reevaluated the design of every component in those weapons against revised requirements. The two agencies have authorized hundreds of changes to nuclear weapons, adding new components and modifying weapons' military characteristics. Few, if any, of the replacements were required to extend the life of aging components. Rather, NNSA and DoD have chosen to make weapons lighter, more rugged, more tamper proof, and more resistant to radiation. In addition, NNSA installed new components that improved design margins, added arming and fuzing options, improved targeting flexibility and effectiveness, and put in advanced tritium delivery systems.

27|9.a

Under LEPs, DOE is seeking to upgrade every type of nuclear warhead in the planned arsenal. Upgrades have already been done on the W87 and B61 warheads. NNSA is now ramping up the LEP for the most numerous weapon in the stockpile, the sub-launched W76, which it estimates will cost over $3 billion. The planned modifications are so extensive that the weapon is being given a new number: the W76-1/Mk4A (the latter refers to its modified reentry vehicle). Under the W76 LEP, NNSA is replacing organics in the primary; replacing detonators; replacing chemical high explosives; refurbishing the secondary; adding a new Arming, Fuzing & Firing (AF&F) system, a new gas reservoir, a new gas transfer support system, a new lightning arrestor connector and making numerous other alterations to components that still function adequately.[3] The change to the AF&F system alone is creating a weapon with significantly improved military capability over the old version. While the old fuze permitted targeting of only soft targets via air bursts, the new AF&F system would add a ground burst capability, which delivers much greater damage to underground facilities. In addition, a new reentry body and other modifications would allow the W76 to be delivered by the D5 missile, which has much greater accuracy than the previous delivery vehicle. Taken together, these changes give the W76 a hard target kill capability against missile silos, command and control centers, etc. for the first time.

With the exception of replacing some organic adhesives, few, if any, of the changes under the W76 LEP address age-related problems that would require fixing under the Curatorship option. The Bush Administration planned to convert 2,400 W76 warheads to W76-1s.[4] Needless to say, the Obama Administration will have to clarify exactly how many W76s, if any, it plans to convert to W76-1's and how many it plans to retire and dismantle under its new proposal for bilateral reductions with Russia to reduce each nation's stockpile to 1,000 nuclear weapons. We recommend that the existing W76 LEP, and ongoing LEPs for other warheads, be suspended pending institution of the change control process described below that would constrain new Life Extension Programs to replace only components that demonstrably need to be replaced.

[3] "Administration Increases Submarine Nuclear Warhead Production Plan," Hans M. Kristensen, Federation of American Scientists, www.fas.org/blog/ssp/2007/08/us_tripples_submarine_warhead.php
[4] Ibid.

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Recently, following the congressional rejection of funding for the RRW program, officials at the weapons laboratories and with the U.S. Strategic Command have called for expanding the Life Extension Program even further.[5,6] To date, NNSA has refrained from modifying or replacing plutonium pits during an LEP. Under a concept referred to as "extensive reuse LEP" (erLEP), also referred to as a "heavy LEP," that Rubicon would be crossed. NNSA would be allowed to reuse pits from retired warheads to provide "higher system margins" for warheads remaining in the stockpile. NNSA would make additional modifications to those warheads directed at improving their surety. Under the new erLEP concept, NNSA could also modify and reuse secondaries from retired warheads, recycle and reuse difficult to fabricate materials, such as fogbank,[7] and modify and add new electronic components using "modern technologies." It is not clear what changes NNSA wants to make to warheads using these recycled or rebuilt components.

In contrast, Curatorship would take a very conservative approach to modifying warheads. Only if NNSA could present compelling evidence that a warhead component has degraded, or will soon degrade, and that such degradation could cause a significant loss of safety or reliability, would NNSA replace the affected parts. The replacements would be remanufactured as closely to their original design as possible.[8] These replacement parts would truly extend the life of the warhead, without modifying its performance. NNSA currently takes apart approximately eleven warheads of each type per year and examines them under its Surveillance and Evaluation Program. Under Curatorship, NNSA would increase the scope and importance of the Surveillance and Evaluation Program to assure that sufficient numbers of every component of every warhead design are scrupulously examined and tested each year. The Surveillance and Evaluation program would supplant the Life Extension Program as the predominant mechanism for determining when components are replaced.

28|9.a

Scientists and engineers at the weapon labs are working to develop sensors that they can embed into existing warheads under NNSA's proposed erLEP program. The sensors would monitor each warhead's condition and identify if there is any degradation that might affect its performance. According to the laboratories, such sensors would allow NNSA to reduce its surveillance activities. We believe that reducing surveillance is the wrong way to go. Embedded sensors cannot possibly provide as much information as disassembling a warhead and examining and testing its components. Embedding sensors into existing, well-tested warheads could provide new opportunities for component failure. Even worse, it could affect the performance of the warheads in poorly understood ways. We prefer to minimize stringently any changes to the well-tested and certified safe and reliable warheads of the existing stockpile.

Stockpile Stewardship requires a massive R & D enterprise and the use of ever expanding modeling capabilities in a complex process to certify each year that the changing stockpile is safe and reliable. Under Curatorship, continued confidence in the stockpile would be based on an absence of

[5] "Military's RRW Alternative is Warhead Life Extension," Elaine Grossman, Global Security Newswire, Sept. 12, 2008, www.gsn.nti.org/gsn

[6] "Stewarding a Reduced Stockpile," Bruce T. Goodwin and Glenn L. Mara, AAAS Technical Issues Workshop, April 24, 2008, Washington, DC.

[7] Fogbank is a codeword for a classified material that is believed to be an aerogel (somewhat like Styrofoam) used in some warheads as interstage material between a nuclear weapon's primary (i.e. the plutonium pit and surrounding high explosives) and its secondary.

[8] In some cases, current environmental regulations might not allow exact remanufacture of old components. In others, original specifications have been lost or are incomplete. In those cases, NNSA would attempt to match the performance of the old component as closely as possible. Those cases would require more analysis and testing than exact replacements, but would still be far less costly and introduce much less uncertainty than under the current approach, which allows for major modifications.

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change and reference to the extensive historical testing and certification activities that have already demonstrated existing warheads to be safe and reliable. Absent any observed physical changes to a warhead, or hidden changes in performance that may be inferred from nonnuclear test and evaluation activities, the warhead's continued safety and reliability would be assumed, because of its known testing pedigree. In other words, "If it ain't broke, don't fix it." The key to maintaining the stockpile would be determining whether significant degradation has occurred. NNSA would still need skilled engineers and designers, with good judgment, to examine warheads and to determine if components are degrading and when they must be replaced. NNSA would continue to operate state-of-the-art testing and engineering facilities to examine components. It would retain sufficient scientific and computing capabilities to apply analytical models to questions of weapon safety and reliability using all the knowledge that the NNSA has gained to date through the Stockpile Stewardship Program. NNSA would make use of evolutionary improvements in computing technology to better appraise problems with weapons systems, but it would no longer be the engine for making and funding such improvements.

On the other hand, NNSA would have no need to continue enhancing its understanding of weapons science or to maintain cutting edge research facilities in a wide range of technologies. Those capabilities are needed primarily to design and certify new components. Under Curatorship, most of NNSA's weapons-related research and experimentation programs would cease and numerous facilities would be closed.

The Curatorship approach to managing the nuclear weapons stockpile builds on an impressive lineage. It stands on basic concepts advocated by Norris Bradbury, Director of the Los Alamos Laboratory (LANL) from 1945-1970, J. Carson Mark, former head of the LANL's Theoretical Division, Richard Garwin, former nuclear weapon designer and current JASON, Ray Kidder, senior staff scientist and former weapons designer at Lawrence Livermore National Laboratory (LLNL) and others.

Curatorship is Better than Stockpile Stewardship

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The NNSA is currently engaged in a major effort to rebuild the nuclear weapons complex, the aforementioned Complex Transformation. According to the NNSA, the benefits it is seeking through Complex Transformation include, "improved safety, security, and environmental systems, reduced operating costs, and greater responsiveness to future changes in national security policy."[9] Curatorship would be more beneficial in all of these areas than any of the alternatives that NNSA considered under Complex Transformation.

Improved Safety – Under Curatorship, and particularly with the stockpile reduced to 500 warheads, there would be far less work involved in maintaining the nation's nuclear deterrent. Thus, NNSA would significantly reduce the scale of plutonium and enriched uranium operations associated with maintenance. By reducing worker exposures and the risks of accidents, a lower workload is inherently safer. In addition, studies of defects in nuclear weapons have shown that many more problems have occurred in new weapons and components than in weapons that have been in the stockpile for a considerable period. Thus, maintaining existing weapons much as they are today, under Curatorship, is more likely to keep them problem free than introducing new components through LEPs or designing new warheads under Stockpile Stewardship. This is a familiar effect common to products as diverse as computer software, automobiles, and nuclear power plants. The reliability of software most often improves with age, as frequent revisions and updates in response to operational experience

[9] Final Complex Transformation Supplemental Programmatic Environmental Impact Statement (SPEIS), DOE/EIS-0236-S4, NNSA, October 2008, p.S-1.

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progressively eliminate sources of error in the code. Similarly, with automobiles, if you want a problem-free vehicle, it is best not to rush out and buy the first year of any new model, particularly if it incorporates substantially new technology.

Improved Security – Security would be improved under Curatorship for the same reasons that safety would be better. Under Curatorship, the weapons complex would be more secure, simply because there would be fewer sensitive activities conducted at fewer sites. There would be fewer R & D facilities requiring protection and less new classified information to be safeguarded against espionage or inadvertent disclosure. There would be fewer contractor employees with access to sensitive facilities and classified information. There would also be fewer shipments of nuclear weapons and components around the country, which offer opportunities to terrorists. In addition, fissile materials would be consolidated to fewer and more secure facilities.

Improved environmental systems – Under the Curatorship approach, NNSA would close numerous facilities and in some cases entire sites that use high explosives, tritium, or other hazardous materials, such as Site 300 at LLNL. Those closures would produce significant environmental benefits and cost savings beyond the alternatives the NNSA is considering under Complex Transformation.

29|9.a cont.

Reduced operating costs – Operating costs would be dramatically reduced under Curatorship, well beyond the obvious savings from reducing the number of nuclear weapons. NNSA currently spends about fifty percent of the Weapons Activities budget on R & D. That is appallingly out of step with any industrial activity in the United States. Large companies in the most research-intensive industries, such as computers and electronics, chemicals, aviation, and biotechnology, spend less than twenty percent of their revenue on R & D. Most spend less than ten percent. With over sixty-five years of experience in designing, producing, and maintaining nuclear weapons, there is no reason for NNSA to spend such a large percentage of its funding on R & D. Under Curatorship, NNSA would devote no more than twenty percent of its Weapons Activities budget to R & D.

Strengthen non-proliferation efforts -- Most importantly, Curatorship is superior to the Stockpile Stewardship Program, because it would more closely align with United States' responsibilities under the Non-Proliferation Treaty and the nation's non-proliferation goals. Strengthening non-proliferation is not one of NNSA's goals in Complex Transformation, but it certainly should be. The New Agenda Coalition (NAC), a diverse and influential group of signatory states to the NPT, has called upon the nuclear weapons states to stop modernizing their arsenals.[10] The NAC stated, "Any plans or intentions to develop new types of nuclear weapons or rationalization for their use stand in marked contradiction to the NPT, and undermine the international community's efforts towards improving the security of all states." Whether one agrees with the NAC that improving nuclear weapons is contrary to U.S. NPT obligations (and we believe it is), it is clearly detrimental to U.S. non-proliferation objectives. Stemming the proliferation of nuclear weapons requires the cooperation of all nations. To the extent that the NNSA's development of new and improved nuclear weapons alienates nations such as the New Agenda Coalition, it is undeniably contrary to U.S. non-proliferation goals.

Changes to Nuclear Weapons Should be Better Controlled

As noted above, NNSA and DoD have authorized hundreds of changes to nuclear weapons, the vast majority of which were not needed to extend the life of the weapon. The administrative control of nuclear weapon designs is currently under the auspices of the Nuclear Weapons Council (NWC). The NWC is a joint DoD/DOE organization established by Congress in 1987 to coordinate all joint activities

[10] The membership of the New Agenda Coalition includes: Brazil, Egypt, Ireland, Mexico, New Zealand, South Africa, and Sweden.

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regarding the nuclear weapons stockpile. The NWC is chaired by the Under Secretary of Defense for Acquisition, Technology, and Logistics. The other members are the Vice Chairman of the Joint Chiefs of Staff, the Under Secretary of Energy for Nuclear Security (NNSA Administrator), the Under Secretary of Defense for Policy, and the Commander of the U.S. Strategic Command (STRATCOM). Among its activities, the NWC coordinates, determines, and schedules all activities regarding the maintenance and refurbishment of nuclear weapons. Much of that coordination is done in Project Officers Groups (POGs), which are chartered by the NWC with cradle to grave responsibility for each type of nuclear weapon. POGs typically have as many as a dozen members from various DoD organizations, the military services, DOE, NNSA, and the nuclear weapons complex's laboratories and production plants.

The POGs, working with the NNSA laboratories, annually assess each warhead type with regard to its military characteristics (yield, reliability, safety in normal and abnormal environments, nuclear hardness, weight and balance, use control features, and a host of other factors) and its stockpile-to-target sequence requirements for withstanding extremes of temperature, pressure, acceleration and other conditions a warhead might have to withstand throughout its lifetime. These assessments have become forums for examining, not only whether the warhead continues to meet it existing requirements, but also for considering changes to warheads to improve performance, add new capabilities, or modify components for any reason. Unfortunately, there is little resistance to making changes to warheads in this process. The POGs are simply too immersed in the mission of enhancing their weapon systems and are unable to see the forest for the trees. They have an institutional bias, which leads them to magnify minor questions about warhead performance, to look for potential improvements (including surety improvements), and to recommend modifications, without realizing the long-term problems with that approach.

30|9.a

We believe that a more rigorous and formal change control process is needed. A rigorous change control process is the embodiment of the Curatorship approach. The Administration and the Congress must first declare support for the Curatorship approach of minimizing changes to existing warheads and then establish a change control process to enforce it. We recommend that President Obama issue a Presidential Decision Directive (PDD) prohibiting any change in the military characteristics or the stockpile-to-target sequence requirements of any nuclear weapon, unless the change is essential for maintaining the safety or reliability of the existing warhead. However, announcing a policy to limit changes to warheads, by itself, is not enough. Congress must establish an institutional mechanism to enforce that policy.

Independent experts should review any proposed change to a nuclear weapon (no matter how seemingly minor) and make recommendations to senior Administration officials, who then would have the final say. To further that end, we recommend that Congress establish through legislation a stringent change control process for nuclear weapons, including a requirement for outside review of all changes. Major changes, including any that would alter the military characteristics or the stockpile-to-target sequence of a nuclear weapon in any manner, should require authorization and funding by the Congress as a separate line-item.

The process for independent assessment of proposed changes could take many forms, but we believe it should include some form of review from outside the weapons laboratories. Independent review might be solicited from the JASON scientific advisory group, the National Academy of Sciences, or a new entity established solely for that purpose.

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Final decisions, except those requiring separate funding from the Congress, could remain with the Nuclear Weapons Council (NWC), be made by a new Federal nuclear weapons change control board, or be made by an expanded NWC to include senior Executive Branch officials who bring a big picture view of national security. Potential additions to the NWC include the Under Secretary of State for Arms Control and International Security and the President's National Security Advisor. In any event, we recommend that Congress establish the change control process in legislation and require that both outside reviewers and the decision makers weigh the potential benefits of any proposed change against the adverse non-proliferation consequences and the likelihood that the change could, over time, contribute to reduced confidence in the performance the warhead. 31|9.a

The Process for Assessing and Certifying Nuclear Weapons Should be Revised 32|9.a

When President Clinton submitted the Comprehensive Test Ban Treaty to the Senate for ratification in 1995, he enunciated a number of safeguards to assure the Congress that the nuclear stockpile could be maintained without testing. He announced, as "Safeguard F," that

> *"if the President is informed by the Secretaries of Energy and Defense, advised by the Nuclear Weapons Council, the directors of the weapons laboratories, and the Commander-in-Chief of Strategic Command that a high-level of confidence in the safety or reliability of a weapon type critical to the nuclear deterrent could no longer be certified, the President, in consultation with the Congress, would be prepared to withdraw from the CTBT under the Supreme National Interest Clause in order to conduct whatever nuclear testing might be required."*

President Clinton also directed the DoD and DOE to conduct a rigorous annual certification process to determine the overall safety and reliability of the stockpile.

Congress formalized this process in section 3141 of the National Defense Authorization Act for Fiscal Year 2003 (P.L. 107-314), which specifies a number of assessments that must be performed each year leading to an annual report on the stockpile to the President and the Congress from the Secretaries of Defense and Energy. The nuclear weapons establishment has responded to these requirements with an elaborate system of technical investigations and the preparation of seven major series of reports, including:

- *Weapons Laboratory Annual Assessment Reports (AARs)*: Prepared for each weapon type by the technical staff of the weapons laboratory responsible for the nuclear explosive package (LANL or LLNL) and their engineering counterpart at SNL.
- *Weapons Laboratory Red Team Reports*: Prepared by a separate "red team" at each weapons laboratory that peer reviews the technical information contained in the laboratory's AARs.
- *Weapons Laboratory Director Reports*: An assessment of the safety, performance, and reliability of the nuclear stockpile to the NWC and the Secretaries of Energy and Defense by the director of each weapons laboratory, based on the AARs and the Red Team reports.
- *Strategic Advisory Group Stockpile Assessment Team (SAGSAT) Report*: Prepared for the STRATCOM Commander, which expresses the SAGSAT's confidence as to whether each warhead type will perform as designed.
- *Commander of STRATCOM Report*: The Commander of STRATCOM's assessment of the safety, performance, reliability and military effectiveness of the nuclear stockpile, submitted to the NWC and the Secretaries of Energy and Defense.

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- *POG Reports*: A technical assessment, submitted to the NWC, from each POG on the warhead type for which it is responsible.
- *Report on Stockpile Assessments*: The final package, prepared by the NWC on behalf of the Secretaries of Energy and Defense, which summarizes and transmits the above reports to the President and the Congress.[11]

The assessments in these reports, in actuality, have little to do with certification of the stockpile. According to NNSA and laboratory officials, "once a warhead is certified, it remains certified until it is either decertified or retired."[12] Furthermore, this convoluted process has nothing to do with notifying the President about the need for a nuclear test, which was ostensibly its original purpose. According to agency and congressional officials, "if an issue with a weapon were to arise that required a nuclear test to resolve, the Secretaries of Energy and Defense, the President, and the Congress would be notified immediately and outside of the context of the annual assessment process."[13] What the process has turned into is make-work for dozens of national laboratory scientists and technicians, as well as weapons specialists in NNSA, the NWC, the military services, STRATCOM, and other DoD agencies. It also serves as one more mechanism for the laboratories and the services to propose modifications to U.S. nuclear weapons.

The annual assessment process is a major underpinning for much of the research and development work at the weapons laboratories, which is performed under Stockpile Stewardship. In order to prepare their Annual Assessment Reports, the laboratories use all of their testing and simulation capabilities to quantify estimates of the margins and uncertainties for a host of factors, which they use to determine whether the nuclear explosive package of a nuclear weapon would meet its military characteristics. The labs continue to investigate minute details of nuclear weapons technology, in order to produce new and improved bottom up assessments each year.

This elaborate process of ever improving simulation capabilities and annual reviews is conceivably needed only if there are significant changes to the warheads each year. Under Curatorship, with few, if any, modifications to the well-tested designs in the stockpile, the laboratories would need only to analyze the potential effects of changes due to aging on components, which are identified under the upgraded surveillance program. Existing diagnostic, assessment, and modeling capabilities are sufficient for this task. As is the case now, if the surveillance program and subsequent analysis were to identify a problem that threatened the adequate performance of a weapon in the stockpile, the Nuclear Weapons Council, the Secretaries of Defense and Energy, and the President and Congress would all be informed promptly about the problem. 33|9.a

Thus, recurring annual assessments or certification of the safety and reliability of the stockpile should not be necessary. Nevertheless, to provide additional assurance that the weapons in the stockpile remain safe and reliable, the laboratories and the military services might update the assessment of each weapon system every five years. The assessments could be similar to those required under Section 3141, but would not be as elaborate since they would have to examine only the few changes that were produced by or made in response to aging. One change we recommend to the assessment process is to make the existing Red Teams at LANL, LLNL, and SNL truly independent. The Red Teams review the analyses of those laboratory scientists with direct responsibility for maintaining each warhead. The Red Teams consist primarily of other laboratory personnel who currently report to the same management

[11] From "Nuclear Weapons: Annual Assessment of the Safety, Performance, and Reliability of the Nation's Stockpile," U.S. Government Accountability Office (GAO-07-243R), February 2, 2007., p. 9.
[12] Ibid. p. 6.
[13] Ibid. p. 3.

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team as those performing the initial assessments. We recommend that the Red Team members be hired under a separate contract from the management contract of the laboratories at which they are situated and that they report their findings directly to the NNSA, rather than through their laboratory directors.

As is the case now, if any of the laboratory analyses find a significant problem with a weapons system, their report should include a discussion of the options available to resolve the problem. The options should include replacing one or more components with new versions of the original design, replacing components with modified versions, changing weapon handling procedures, changing the military characteristics or stockpile-to-target sequences, retiring specific warheads, replacing warheads with others, and any other compensatory measures that could enable accomplishment of the missions of the nuclear weapon types to which the assessments relate. Only if it concludes that none of those options is feasible, should a laboratory be allowed analyze whether conducting one or more underground nuclear tests might help NNSA resolve the problem.

34|9.a It is hard for us to imagine a circumstance in which one of the measures listed above could not resolve any problem, without a need to resort to nuclear testing. Nevertheless, to prepare for the remote possibility that a President might request authority from the Congress for NNSA to conduct a nuclear test, we recommend that Congress require any such request to be accompanied by independent analyses from the Central Intelligence Agency (CIA) and the State Department on the effects of a U.S. nuclear weapons test on the CTBT, the NPT, and all other nations possessing nuclear weapons or those which may be seeking to acquire them. Congress could then decide whether the benefits of a nuclear test outweigh the adverse national security consequences of withdrawing from the CTBT and/or breaking the current moratorium on nuclear weapons tests.

How Would Weapons Research, Development, and Testing Change Under Curatorship?

35|9.a This section provides an overview of the changes we recommend to research, development, and testing facilities and activities in the weapons complex in accordance with the Curatorship approach.

Under the Curatorship approach, we recommend that the NNSA de-emphasize nuclear weapons science and technology and cease its quest for more and more detailed simulations of exploding thermonuclear weapons. The existing codes are sufficient, in conjunction with limited use of hydrotesting, for the analyses needed to maintain the stockpile as it is. Improved codes have little use except for designing new types of nuclear weapons or verifying the impact of major changes to existing ones. Designing new nuclear weapons would run counter to U.S. commitments under Article VI of the NPT and would set a bad example for the rest of the world. President Obama has already declared that the United States will not design new nuclear weapons. The NNSA's claim that it needs better computer codes to maintain existing weapons is tantamount to Iran's claim that it needs a domestic uranium enrichment capability for nuclear power. Both claims may provide fig leaves for thinly-veiled nuclear weapons development programs.

We recommend that NNSA dramatically reduce its research efforts in several areas, including equation of states studies, dynamic modeling, studies of the physical and chemical properties of Pu and HEU, hydrodynamics experiments, and sub-critical tests. Most of this research has no purpose for anything except improving nuclear weapons. We recommend that NNSA continue validating its codes against existing test data and applying those codes to questions of relevance to the existing stockpile. We would expand the testing and analysis of components taken from actual warheads in the stockpile to assure that any changes to components due to aging are discovered and analyzed before they become detrimental to nuclear weapons performance. This empirical approach to stockpile surveillance and

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maintenance is far superior and should be prioritized over endless "nuclear weapons science." A simple way of putting it is that we recommend an "engineering" rather than a "science-based" approach to stockpile maintenance.

35|9.a cont. With significantly less weapons R & D under Curatorship, NNSA could shrink its R & D infrastructure. We recommend reducing the number of facilities and personnel dedicated to nuclear weapons research, development, and testing and consolidating the remaining efforts to LANL and SNL-NM. In particular, we recommend closing all nuclear weapons R & D facilities at LLNL or transferring them to other DOE programs for non-weapons research. Under our plan, LLNL would retain a small capability to examine surveillance issues and a "red-team" of experts to provide peer review for changes to nuclear weapons and for certification-related actions. The Red Team would report directly to NNSA rather than to LLNL management. Any related experimental investigation, which may be necessary to support that activity, would have to be performed elsewhere.

DOE would shift LLNL's primary mission from nuclear weapons research to basic science and energy research, while maintaining strong programs in non-proliferation, safeguards, transparency and verification of warhead dismantlement, intelligence, and nuclear emergency response.

In addition, we recommend that NNSA cease, or transfer to SNL-NM, all weapons-related activities at SNL-CA. All facilities at SNL-CA would be closed or transferred to other DOE offices or to other agencies.

36|9.a Furthermore, we recommend that NNSA cease all sub-critical testing and most other nuclear weapons-related tests and experiments at the Nevada Test Site (NTS) and transfer the landlord responsibility for the site to another DOE office or other appropriate entity. Operations at the U1A facility should be suspended and the facility closed. DOE or other agencies could continue to operate other research, development, and testing facilities at NTS, including the Big Explosives Experimental Facility (BEEF) and large gas guns, as user facilities. The NNSA weapons program could use those facilities infrequently, but only for tests that are necessary to resolve problems identified with weapons in the existing stockpile.

Following is a summary of our recommendations by major classes of research, development, and testing facilities.

Advanced Simulation and Computing (ASC) - One of the major initial goals of the Stockpile Stewardship program was to improve NNSA's computing capabilities to better model nuclear weapons performance. Today, fifteen years and billions of dollars later, NNSA has gone from one-and two-dimensional codes, which modeled all nuclear explosions as if they were perfectly symmetrical, to three-dimensional codes that can model real-world issues that might affect the performance of aging nuclear weapons, such as cracks and corrosion. NNSA has also incorporated a vast amount of new experimental data into the codes, which reflect observed material properties and more refined extrapolations based on such new observations, rather than ad hoc assumptions. This is believed to have greatly improved the accuracy of the codes, as well as NNSA's confidence in their predictive results. Improved confidence in the codes has led some weapons designers to believe they are good enough to be used to design and certify new nuclear weapons, without full-scale underground nuclear weapons tests. Designers' ability to certify new nuclear weapons, without testing, is controversial. However, modeling existing weapons of the legacy stockpile is a much easier task. It is easier because the extensive results from nuclear testing of those weapons has been used to baseline the new sophisticated codes. In addition, this

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original test data had been augmented by an enormous amount of test data from recent hydrodynamic and other tests on the legacy designs.

Consistent with the Curatorship approach, we recommend that NNSA halt all systematic efforts to improve the computer codes it uses to model nuclear explosions. This action would be a major step in abiding by the commitment to halt the arms race under Article VI of the NPT. In addition, it would save hundreds of millions of dollars per year that is now spent developing new computer codes and acquiring ever more powerful computing platforms. Furthermore, it would allow NNSA to close numerous nuclear weapons research facilities, whose primary purpose is to feed results into code development.

36|9.a cont. We also recommend that NNSA cease its current practice of subsidizing development of new computer technology by continually upgrading its computer facilities to the fastest computers in the world through joint development programs with supercomputer manufacturers. DOE might continue to subsidize development of supercomputing in this manner via other programs with greater scientific and social merit (for example, meeting the immense computing needs of predicting global climate changes). However, development of supercomputers would not be a mission of the nuclear weapons program under Curatorship.

Under Curatorship, as improvements in computer technology become available in the commercial marketplace, NNSA could adapt its existing codes to run on those faster computers. NNSA could also continue to validate its computer codes by comparing new calculations to existing test data and could continue to apply its codes to better understand the behavior of the legacy stockpile under a variety of conditions.

High Energy Density and Pressure (HEDP) R & D - NNSA has numerous facilities it uses to create high pressures, densities, and temperatures for studying the behavior of materials under conditions similar to those in an exploding nuclear weapon. These facilities, including large lasers, pulsed power machines, and gas guns, are referred to collectively as HEDP facilities. HEDP facilities are used primarily to provide information on material properties in extreme conditions. NNSA primarily uses that information to improve the computer codes used to model exploding nuclear weapons. NNSA also uses HEDP facilities for integrated tests of those codes. Since NNSA would no longer seek to improve its modeling capabilities under the Curatorship approach, all HEDP facilities would be candidates for closure, unless they had some other legitimate scientific use.

36|9.a cont.

36|9.a cont.

Some of the HEDP facilities can produce X-rays or other effects, which NNSA may use in "environmental testing" to qualify replacement components or as part of the surveillance program. NNSA has numerous other facilities that produce similar effects, many of which would remain in operation under Curatorship (see Major Environmental Test Facilities below). Selected HEDP facilities might also remain in operation, if they are cost effective or crucial to environmental testing. In addition, some HEDP facilities might have applications in fields other than nuclear weapons, including fusion energy, astrophysics, and as sources of X-rays for research in numerous areas. Those facilities might be transferred to other DOE offices or other agencies and remain in operation. The remaining HEDP facilities would be closed.

36|9.a cont.

Hydrodynamic Testing - Hydrodynamic Testing is sometimes used (in conjunction with computer modeling) to examine issues that are discovered during surveillance. It is more often used to perform weapons physics research, to improve modeling of nuclear weapons performance, to study new nuclear weapons geometries, to design and certify new nuclear weapons, and to evaluate the performance of new materials and components. Under Curatorship, it would be used for the first purpose only. That would require only a small fraction of the current testing rate.

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Under Curatorship, all hydrodynamic testing facilities would be closed, except for the ***Dual-Axis Radiographic Hydrodynamic Test*** (DARHT) facility at LANL. DARHT is the most modern of NNSA's hydrotest facilities. When DARHT becomes fully operational, it will be capable of performing tests with multiple shots from two different viewing angles on targets including full-scale mockups of any warhead in the current stockpile. About 100 hydrotests per year are performed at DARHT, which would be more than sufficient for all of the hydrotesting required under Curatorship. Under our plan, any planning for a follow-on Advanced Hydrotest Facility, part of NNSA's long-term vision for the Nevada Test Site, would end.

36|9.a cont.

Sub-critical tests are a special class of hydrodynamic test, in which small amounts of Pu or HEU are compressed in ways that produce some fission, but cannot lead to a self-sustaining fast neutron chain reaction in the material. They are currently performed at the U1A underground test facility at the NTS. Sub-critical tests would cease under Curatorship and the U1A facility would be closed.

Major Environmental Test Facilities – NNSA's *Final Supplemental Programmatic Environmental Impact Statement (SPEIS) on Complex Transformation* identifies more than thirty "Major Environmental Test Facilities (ETFs)." NNSA uses those facilities for multiple purposes including R & D on new component and weapon designs and for certification of new components and weapons. Under Curatorship, there would be no development of new components or weapons and those uses would drop out. Some Environmental Test facilities have also been used to test and validate changes in computer models. Those uses would also drop out.

36|9.a cont.

NNSA also uses many of the ETFs to test components from weapons randomly drawn from the stockpile as part of its surveillance program. That activity would expand under Curatorship. In addition, testing for certification and quality assurance of necessary replacement parts would also continue under Curatorship. Under Curatorship, NNSA would retain or replace only those ETFs that are essential to the surveillance program. Many of the facilities that are retained or replaced under NNSA's preferred alternative -- consolidate major environmental testing at SNL-NM -- appear to meet that criterion. There is, however, insufficient information in the SPEIS to determine whether each of those facilities would do so. Some ETFs are likely to have very limited roles under Curatorship and would be transferred to another DOE office, another agency, or closed.

36|9.a cont.

36|9.a cont. High Explosives (HE) R & D - Most of the HE R & D that NNSA currently supports is focused on formulation of new explosives. This work would cease under Curatorship. Studies of aging of HE formulations in existing weapons and components could continue at Pantex. Surveillance activities and quality assurance (QA) studies of HE in existing components would be expanded.

36|9.a cont. Tritium R & D - NNSA performs R & D on tritium primarily to improve its understanding of mixing issues in imploding primaries or to design new gas handling systems. We recommend halting both of those activities under Curatorship. R&D at SNL-NM for production support and quality improvement of neutron generator production could continue.

Microsystems, Nanotechnology, and Advanced Electronic R & D - NNSA supports a substantial amount of R & D on microsystems, nanotechnology, and advanced electronics. This work is applicable only for designing and fabricating new nuclear weapon components. Under Curatorship, there would be little or no introduction of new components into nuclear weapons and little need for NNSA to perform such research. Research in microsystems, nanotechnology, and advanced electronics contributes to other missions, including fostering the competitiveness of US industry. However, unless

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NNSA's state of the art facilities for R & D on those technologies are supported by other programs or agencies, they would be closed under Curatorship.

(NOTE: Significant portions of this comment's Curatorship section first appeared as part of the report, *Transforming the U.S. Strategic Posture and Weapons Complex for Transition to a Nuclear Weapons-Free World*, published in April 2009. Its lead author was Dr. Robert Civiak, with contributing authorship by Marylia Kelley, Christopher Paine, Jay Coghlan, Peter Stockton and Ingrid Drake. Additions and changes from the report's original text to highlight its NEPA relevance to the SWEIS are the responsibility of Marylia Kelley and Tri-Valley CAREs.)

XII. Conclusion

NEPA requires that the proposed SWEIS fully analyze an alternative for Y-12 that offers the site a future that differs substantially from its past. Tri-Valley CAREs looks forward to seeing these alternatives comprehensively and thoroughly described in the next iteration of the SW EIS. The other deficiencies of the draft SWEIS noted above must likewise be remedied.

As there is a significant difference between the present draft SWEIS and a NEPA-compliant draft SWEIS, we further request that NNSA re-circulate an adequate draft document for public comment before finalizing it and publishing a Record of Decision based thereupon.

Thank you for your consideration.

Sincerely,

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Kelly, Bev

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WD013

[redacted]

From: bev kelly, ph.d. [bev@bevkellyphd.com]
Sent: Tuesday, November 17, 2009 2:25 PM
To: DIV.Y12SWEIS.Comments
Subject: NO NUCLEAR WEAPONS PLANTS ANYWHERE

firstName=bev
lastName=kelly, ph.d.
organization=self
email=bev@bevkellyphd.com
address1=248 La Verne
address2=
city=Long Beach
state=ca
zip=90803
country=USA
subject=Draft Y-12 SWEIS
1|14.0 comments=Please!! for the sake of our environment and the safety of all beings, NO NUCLEAR WEAPONS PLANTS ANYWHERE--

Bev Kelly, Ph.D.

Kemp, David

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WD058

[redacted]

From: David Kemp [davidkemp21@gmail.com]
Sent: Monday, December 28, 2009 11:43 PM
To: DIV.Y12SWEIS.Comments
Subject: Form posted from Windows Internet Explorer.

firstName=David
lastName=Kemp
organization=United States citizen
email=davidkemp@juno.com
address1=1854 Hoopes Street
address2=
city=Alcoa
state=TN
zip=37701
country=USA
subject=Draft Y-12 SWEIS
1|14.0 comments=I do not support further nuclear armament by our nation. I am sorry it is part of your job to try to develop and build WMD's. Please use your talents more peacefully.

1

Kuykendall, David

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MD017

To:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN. 37830

The need to maintain a reliable nuclear weapons production facility is more relevant today than in years past. From my personal view point, today's threats are far more dangerous and menacing than during the cold war. I need not go into the reasoning behind this view point, but rather stress the need to modernize the production facilities at Y-12.

1|3.B

The buildings, equipment and facilities for production are run down and out of date. When these production machines and buildings were built, the only hand held communication devices available were in the sci-fi movies. The calculating and computing power in today's cell phone exceeded the computing power in all of Y-12 when these same facilities, many being used today, were built and put in operation. Some of the same outdated buildings are currently being used with outdated production equipment. Band-Aids and paint can only go so far.

Consider the analogy, one can keep the old car running, as long as you keep spending a little here and some there, and then an engine rebuild every so many years. The car keeps breaking down time to time, but a bit more money will get it back on the road for another month or so. Much better to nickel and dime that "old car", keep it going, than spend the money on a new one, right? Would you, yourself, take your family or loved ones on a cross country trip in this car?

With something as important such as National Security, why would America not desire to maintain a reliable nuclear deterrent along with the facilities and infrastructure to assure reliability? The entire free world relies on America to have their backs, and maintain a reliable deterrent. I realize a perfect world without nuclear weapons is noble, but this is not a perfect world; not by a long shot, especially today.

In order to maintain a deterrent, required in today's world, we must maintain our facilities and infrastructure. The Y-12 Nuclear Weapons Complex is the place to continue this important mission. The extensive manufacturing technical expertise is already in place. The track record dating from many years shows that Y-12 is best suited to maintain this mission as needed well into the future. Y-12, as demonstrated in the past and present, is best suited to handle the special materials, safety and security required. Y-12's National mission and plant location is supported by the community, town and state in which it is currently located.

1|3.B (cont)

2|13.0

Thank you for considering my comments,
David Kuykendall

Larson, Jean

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MD070

Draft Y-12 Site-wide
Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

NNSA National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010.

1|9.b An upgraded facility that provides a safe work place for those dismantling nuclear weapons is a priority. Any facility for producing new nuclear weapons should not be ~~built~~ built. Producing more nuclear weapons will increase the likelihood of their use, which in turn would be devastating for the environment of our planet.

Thank you for considering all comments.

Jean Larson
349 Clark Branch Rd
Leicester, NC 28748

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:
http://www.Y12sweis.com

Lassiter, Mike

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MD037

Draft Y-12 Site-wide
Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

NNSA National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010.

1|13.0 Lest any confusion result from my ramblings, let me say up front that I support the Uranium Processing Facility project.

When I comment, I do so as a person that lives just down the road; not someone that comes here on a plane, bus, or train. I also work at Y-12 so I have a perspective that many others may not share.

To begin with, our country must determine whether or not we want to have nuclear weapons. I think we must. Unfortunately, there are some rather ambitious and unsavory characters in the world now that have or will soon have nuclear weapons. Without them we are extremely vulnerable. One of our forefathers once said,"Those who beat their weapons into plowshares will plow the fields of those who don't".

That said, Y-12 does some things to help maintain our nuclear capability that cannot, at the present time, be done anywhere else in our great country. Y-12 has done a miraculous job of meeting the needs of the country from the time the first shovel went into the ground in the Bear Creek Valley in the 1940s. That Mission has become increasingly difficult in recent years. The current facilities are a collection of buildings that have been added to and modified over the years as requirements have changed. They are old, have obsolete technology, and were designed to meet cold war requirements that no longer exist.

2|3.B My primary concerns are the safety of the people that work in these facilities, the security of the materials in these facilities, and the possibility that some piece of the aging process may fail resulting in some sort of release outside the plant. I remember the disaster in Bhopal, India in 1984. With these concerns in mind, I feel it is imperative that modernization go forward at Y-12 and that the Uranium Processing Facility be completed.

Mike Lassiter

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:
http://www.Y12sweis.com

Lentsch, Mary Dennis

Page 1 of 2

MD064

January 25, 2010

Pam Gorman
Y-12 SWEIS Document Manager
Y-12 Site Office
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge TN 37830

Dear Ms. Gorman:

1|3a I consider myself a citizen of the United States as well as a citizen of the world, and believe we should be making every effort to move toward a nuclear free future. I believe nuclear weapons are instruments of death and massive destruction. They can cause physical death and also spiritual death. Spiritual death results when the funds used for the designing, production, testing and upgrading of nuclear weapons is not available for quality education, developmental childcare, safe and affordable housing, accessible 2|10.b health care, and nourishing food. From this perspective I present my comments on the Draft Y12 Site Wide Environmental Impact Statement.

3|10.c I received my copy of the Draft SWEIS and believe that that all reasonable alternatives are not presented as required by law. I reject the 5 alternatives described in the Draft SWEIS and urge that another reasonable alternative be considered. The exorbitant capital expenditures required for the "modernization program" presented in the 5 alternatives cannot be justified. They do not adequately address the demand for dismantlement and disposition of retired nuclear weapons and nuclear waste.

As we strive to move toward a nuclear free future, I believe Alternative 6 should embody the following:

----Consolidate the current production facilities, and down-size into an existing facility, with upgrades as necessary to meet environmental, safety and health standards.

4|9.a ----Incorporate the protocols for safeguard and transparency into the upgrades as they are designed, in order for the US to participate in international verification during disarmament.

----Initiate a production capacity of 10 warheads a year or less that should be adequate to assure the safety and security of the current stockpile as it awaits retirement.

----Design and construct, at the same time, a new state-of-the-art single-purpose facility dedicated to dismantlement and staging for disposition of retired nuclear weapons (secondaries/cases).

----Ensure protective regulations of public and worker health and safety are carried out.

Lentsch, Mary Dennis

Page 2 of 2

4|9.a cont. ----Provide for adequate security protection of nuclear materials themselves.

I urge NEPA to seriously consider Alternative 6 because it is more responsive to future nuclear requirements, more protective of the nation's security and more supportive of nonproliferation efforts. The high security footprint could be reduced by as much as 60%. The new, dedicated dismantlement facility could be designed and built at considerable savings over the proposed Uranium Processing Facility. Alternative 6 moves us in the right direction for a nuclear free future.

As we look forward, I believe the US should commit resources to pursue our stockpile security goals with the minimum investment necessary to maintain a safe and secure stockpile and a maximum commitment to full-capacity dismantlement and disposition.

Mary Dennis Lentsch PBVM
(Elizabeth Ann)
5818 General Diaz Street
New Orleans LA 70124

Mary Dennis Lentsch PBVM

Lloyd-Sidle, Tricia

Page 1 of 1

WD096

[redacted]

From: Tricia Lloyd-Sidle [revtjls@yahoo.com]
Sent: Thursday, January 28, 2010 4:45 PM
To: DIV.Y12SWEIS.Comments
Subject: Form Post from Firefox

firstName=Patricia
lastName=Lloyd-Sidle
organization=
email=revtjls@aol.com
address1=197 N Bellaire Ave
address2=
city=Louisville
state=KY
zip=40206
country=
subject=Draft Y-12 SWEIS
comments=

1|14.0 I am opposed to the use of nuclear weapons; and thus to any project that builds elements related to those weapons. We must work to dismantle nuclear weapons -- not plan to build more of them!

1

Lombardo, Dan

Page 1 of 1

WD117

[redacted]

From: Dan Lombardo [dan@lomb.us]
Sent: Saturday, January 30, 2010 11:26 PM
To: DIV.Y12SWEIS.Comments
Subject: No

Dear Sirs,

1|14.0 No! to the "Uranium Processing Facility" and YES! to a world free of nuclear weapons.

Daniel Lombardo
660 east Preda Dr.
Waterford MI
48328

1

Love, Andy

Page 1 of 1

WD084

[redacted]

From: Andy Love [a-love@charter.net]
Sent: Wednesday, January 27, 2010 9:33 AM
To: DIV.Y12SWEIS.Comments
Subject: alternatvie to weapons factory

To whom it may concern,

1|9.A I am writing to express my strong preference for OREPA alternative 6. It is less costly and would eliminate building more nuclear weapons.

Thank you,
Andy Love

1

Lovelace, Claire

Page 1 of 1

WD044

[redacted]

From: Claire Lovelace [clairejlovelace@embarqmail.com]
Sent: Sunday, November 29, 2009 5:00 PM
To: DIV.Y12SWEIS.Comments
Subject: Form posted from Windows Internet Explorer.

firstName=Claire
lastName=Lovelace
organization=
email=clairejlovelace@embarqmail.com
address1=113 Heritage Place Drive
address2=
city=Jonesborough
state=TN
zip=37659
country=
subject=Draft Y-12 SWEIS

1|9.A comments=I wish to support Alternative 6 of the SWEIS because it best reflects the current policy of the United States as expressed by President Obama. Assuring safety and security by means of consolidated, down-sized, upgraded existing facilities at Y-12 will meet the present need. We do not need a new uranium bomb plant.

2|9.C In view of the fact that the US presented a UN resolution, which was adopted by the security council,that calls on nuclear weapons states to "pursue in good faith . . .disarmament at an early date," it is obvious that a new bomb plant will not help the US abide by its own resolution.

Currently the US has a safe, secure, reliable stockpile. We have spent more than $90 billion since 1996 "modernizing" the nuclear weapons stockpile. By the time a new bomb plant would come on-line (2018), the US stockpile of refurbished "Life Extended" warheads will exceed the maximum number allowed by the START Treaty which was recently renewed with Russia.

Please heed the desires of the citizenry in regard to the Environmental Impact Statement.

1

Lubthisophon, Ken

Page 1 of 1

WD068

[redacted]

From: Lubthisophon, Ken S (3GI) [lubthisophok@y12.doe.gov]
Sent: Thursday, January 21, 2010 9:13 AM
To: DIV.Y12SWEIS.Comments
Subject: Form posted from Windows Internet Explorer.

firstName=Ken
lastName=Lubthisophon
organization=
email=ken.lubt@gmail.com
address1=259 Dogwood Glen Lane
address2=
city=Powell
state=TN
zip=37849
country=
subject=Draft Y-12 SWEIS

1|3.B 2|10.D comments=No matter what the mission, the need to have the Uranium Processing Facility built is vital. The existing conditions of the current facilities, while operating safely, are in desperate need of replacement. To be good stewards of the taxpayerâ€™s money, is part of the operating contractor and NNSAâ€™s responsibility. Continuing to put money into aging facilities, maintain the current security footprint and still meet the mission is not the right decision. Any concerns to having this facility are outweighed exceedingly by these reasons for it:

1|3.B (cont)
- â€¢ Cost savings by reducing the size of the protected areaâ€™s â€˜footprintâ€™
- â€¢ Upgraded safety features for both workers and the general public
- â€¢ External assessments agree that a replacement is needed just on potential safety issues alone (i.e. DNFSB)
- â€¢ More efficient processing to meet the nationâ€™s strategic goals
- â€¢ Continued support of a skilled workforce and economic mainstay
- â€¢ Flexibility to adapt to changing U.S. missions and/or policies
- â€¢ The continuation to secure this highly desirable asset from adversaries in an increasingly dangerous global environment.

These reasons are ones that should be considered as to why I firmly believe and support the need to build the UPF is important to East Tennessee and this nation. Thank you.

finalcd=Final CD-Rom Only

1

Lynch, Rex

Page 1 of 1

MD010

ANDERSON COUNTY
REX LYNCH
COUNTY MAYOR

November 10, 2009

Ms. Pam Gorman
Y-12 SWEIS Document Manger
Y-12 Site Office
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Dear Ms. Gorman,

1|13.0 I am writing you as the Anderson County Mayor in support of the proposed Uranium Processing Facility (UPF) at the Y-12 National Security Complex in Oak Ridge. This facility will be another anchor to the modernization initiative currently underway at Y-12. The draft Site-Wide Environmental Impact Statement (EIS) presents this as the preferred option from several alternatives considered.

Prior to being elected Anderson County Mayor I worked inside the Y-12 plant and have a unique working knowledge of its operation. Also the Y-12 Plant, as well as part of the City of Oak Ridge are in Anderson County.

1|13.0 (cont) Our county and region have always been strong supporters of the uranium processing and nuclear related missions of the Oak Ridge complex. Our Region has invested in the development of a highly skilled workforce that has always been responsive to the safe conduct of the operations associated with these missions for more than 60 years. We are prepared to continue to fully support such missions and to continue to invest in regional workforce development that is required for these operations. We do believe

2|3.B that Y-12's continued role in manufacturing and disassembling nuclear warhead components should be conducted in modernized facilities with cost effective and safety focused processes. We think this preferred option of a new UPF achieves this objective.

Thank you for your consideration of these comments. Please include them in the official record of this EIS.

Best Regards,

Rex Lynch
Anderson County Mayor

cc: Ted Sherry
Congressman John Duncan
Congressman Lincoln Davis
Congressman Zach Wamp
Senator Bob Corker
Senator Lamar Alexander

100 NORTH MAIN STREET • SUITE 208 • CLINTON, TENNESSEE • 37716
PHONE: (865) 457-5400, EXTENSION 200-201 • FAX: (865) 457-6270

Malloy, Randall

WD053

[redacted]

From: Malloy, Randall S (7AQ) [malloyrs@y12.doe.gov]
Sent: Wednesday, December 16, 2009 7:36 AM
To: DIV.Y12SWEIS.Comments
Subject: RE: Show Your Support for a New Uranium Processing Facility

1|5.0 I support Alternative 2, Uranium Processing Facility Alternative.

Randy Malloy
UPF Process Design Group
Product Certification/ANSER Sub-Lead
1099COM, N56A, MS8116
Phone: 865-241-2257
Pager: 865-417-6766
Email: 7AQ or MalloyRS@y12.doe.gov

From: Pharis, Jeri L (J9J)
Sent: Tuesday, December 15, 2009 4:09 PM
To: UPF B&W; UPF BOA; UPF Staff Aug's; UPF YSO
Subject: Show Your Support for a New Uranium Processing Facility

The NNSA is asking for input into its Draft Site-Wide Environmental Impact Statement (SWEIS) for the Y-12 National Security Complex.

NNSA held a public hearing on the SWEIS in November but is urging further input until January 29. Please view the attached sheet.

They left several of these flyers and some comment sheets, along with a collection box. They are on the small round table behind the seating area in the lobby of 1099. We will be bringing a box and some comment forms to OSTI as well.

If you choose to provide any comments please feel free to do so and deposit them in the box provided. They will come by a few times between now and January 29 to pick them up.

This is your chance to provide your opinion! Please take advantage of it!

Thank you.

<< File: UPF Show your support.pdf >>

Jeri Pharis
Office and Admin Services - UPF Project
Phone: 241-0249
Pager: 873-5595

Martin, Mary Kay

Nov. 16, 2009

MD012

Dear Mr. Gorman,

We do not not want or need and should not tolerate further production of nuclear weapons. They are not simply bigger bombs, are not useable, and are the means of ending all human and animal life on this planet. New nuclear weapons or new facilities should not be built. The Y 12 facility function should be dismantling of nuclear weapons in negotiated verifiable steps with other nuclear weapons countries. 1|3.A 2|9.B

Our nuclear weapon policy should renounce first strike use and abandon implicit threats of use against non-nuclear countries. We should end all actions that drive non-nuclear countries to seek nuclear weapons and begin finally to implement our obligations - long ignored - under the Nuclear Non Proliferation Treaty. 3|1.B 4|1.C

Sincerely,
Mary Kay Martin
43620 Via Antonio
Sterling Heights, Mi. 48314

Mason, Robert and Marita

WD050

[redacted]

From: ltahm@aol.com
Sent: Thursday, December 10, 2009 2:22 PM
To: DIV.Y12SWEIS.Comments
Subject: comment for Y12sweis

1|14.0 We do not need to make more bombs.
Period.
We need to dismantle bombs.
Period.
We need to show the world we will stop proliferating bombs.
Period.
Thank You.
Period.

Robert Mason and Marita Hardesty
1235 Lonesome Pine Rd
Kingston Springs TN
37082

Do not postal mail us anything ..use this E address if you wish to respond...

Thank you,
Marita

1

McCollum, Jr., William

MD021

TVA

William R. McCollum, Jr.
Chief Operating Officer

Tennessee Valley Authority
1101 Market St
Chattanooga, TN 37402

November 24, 2009

Ms. Pam Gorman
Y-12 SWEIS Document Manager
Y-12 Site Office
800 Oak Ridge Turnpike
Suite A-500
Oak Ridge, Tennessee 37830

Dear Ms. Gorman:

1|13.0 The Tennessee Valley Authority fully supports the continued operation and modernization of the Y-12 National Security Complex. For more than 50 years, Y-12 has provided unique national security services, and TVA is proud to have contributed to Y-12's important mission.

2|3.B Construction and operation of a new, modernized Uranium Processing Facility (UPF) will result in increased security for the facility and improved health and safety for workers. A new UPF also means significant cost reductions and higher efficiency for Y-12. And those improvements will, in turn, provide benefits for East Tennessee and the Tennessee Valley as a whole.

We recognize Y-12's critical role in supporting national security, and TVA is committed to providing the power needed to support your operations.

Sincerely,

William R. McCollum, Jr.

McNally, Randy

Page 1 of 3

WD009

[redacted]

From: Debbie Martin [debbie.martin@capitol.tn.gov]
Sent: Monday, November 16, 2009 5:19 PM
To: DIV.Y12SWEIS.Comments
Cc: Keim, David M (DK1)
Subject: Letter of support
Attachments: 20091116161156323.pdf

Pam:

Attached is a letter of support for the upcoming hearings on the Site-Wide Environmental Impact Statement at Y-12.
<<20091116161156323.pdf>>
Please let me know if you can not open the attachment.

Thank you,

Deborah Martin
Legislative Executive Secretary to
Senator Randy McNally
615-741-6806

1

McNally, Randy

Page 2 of 3

WD009

RANDY McNALLY
SENATOR
5TH SENATORIAL DISTRICT
ANDERSON, KNOX,
LOUDON AND MONROE COUNTIES

307 WAR MEMORIAL BUILDING
NASHVILLE, TENNESSEE 37243-0205
(615) 741-6806
1-800-449-8366 ext. 16806
FAX (615) 253-0285

Senate Chamber
State of Tennessee
NASHVILLE

CHAIRMAN
FINANCE, WAYS AND MEANS
COMMITTEE

MEMBER OF COMMITTEES
GENERAL WELFARE, HEALTH & HUMAN
RESOURCES
RULES

November 16, 2009

To Whom It May Concern:

1| 3.B I am writing you in support of the construction and operation of a new uranium processing facility and the construction of a new complex command center at the Y-12 National Security Complex in Oak Ridge, Tennessee. It is imperative the operation and modernization of the Y-12 plant be continued and improved for numerous reasons including national security, energy technology, and the economic impact it has on our community and state.

The history of the Y-12 plant is a source of great pride for our community. It has played a vital role to help ensure our nation's freedom. With the goal of preventing the spread of weapons of mass destruction, the Y-12 plant continues to be just as important in making our world safer at this pivotal time in our nation's history as it was when the plant began operations in 1943. The continued operation of this plant is critical to our homeland security.

2|13.0 The Y-12 plant plays other roles which are also important to the future of this nation. The energy mission of this plant is crucial in meeting the growing demands to fuel America in this new age of worldwide technology. Clean, efficient energy is vital to America's future and the Y-12 plant is on the cutting edge with new technology to help us provide the power needed to compete with these growing demands.

The Y-12 plant has demonstrated a high commitment to environmental stewardship by continually working to improve their record with respect to safety and efficiency. It is obvious that those engaged in the operations of this plant live and work in our communities and care about the environmental legacy they will leave to their children and grandchildren. Incorporating sustainable design principles to minimize the impact to the environment will greatly help in those efforts.

McNally, Randy

Page 3 of 3

WD009

November 16, 2009
Page 2

Y-12 is very engaged in Tennessee's future. Their efforts to reach out to area citizens continue to show our community that they are a good neighbor, committed to leaving this area a better place to live. This is evident in their complementary work for other government and private-sector entities, which has been a tremendous asset in helping to create new jobs for Tennessee.

3|12.H

As the 15th largest employer in our state, continuing Y-12 is critical to our state's overall well-being, especially in a time of high unemployment in our state. It contributes more than $4 billion in direct and indirect economic impact to the East Tennessee area, and helps generate over 24,000 jobs.

2|13.0 (cont)

The Y-12 plant is a national resource of tremendous benefit to our state and this nation. It has put our community on the map as the nexus of research and development in a new age of technology. I ask you to join me in support of their mission.

Sincerely,

Randy McNally

Randy McNally
State Senator

RMc/dkm

Morner, David

Page 1 of 1

MD050

Draft Y-12 Site-wide
Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

NNSA
National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010.

1|7.0 I support Option 4 for continued growth and progress of Y-12 Complex.

David S. Morner

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:
http://www.Y12sweis.com

Morris, Jim

Page 1 of 1

WD035

[redacted]

From: Jim Morris [jmorris@processengr.com]
Sent: Wednesday, November 18, 2009 4:37 PM
To: DIV.Y12SWEIS.Comments
Subject: Comments for the Draft Y-12 SWEIS

November 18, 2009

Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike
Suite A500
Oak Ridge, TN 37830

Subject: Draft Y-12 SWEIS

Ms. Gorman,

I was unable to be present at the public hearing and would like to offer the following comments.

1|3.B Y-12 has done an admirable job meeting missions over the past couple of decades with little capital investment. However, today facilities are old and changes in the missions and in the health, safety, and environmental regulations since the cold war's end have highlighted facility inefficiencies.

I support the preferred alternative which will effectively address current inefficiencies and make necessary improvements that will lead to a reliable manufacturing infrastructure for the next 50 years.

2|7.0 Some detractors of the preferred alternative promote an alternative that would build only a new "smaller" dismantlement facility. What must be recognized is that if a decision were made to only dismantle our nuclear weapons stockpile, a significant investment is still required at Y-12 to ensure that every gram of uranium can be collected and accounted for, configured in a safe and secure configuration, and prepared for secure storage. This "smaller" facility would require 1) a significant secure facility, 2) weapons dismantlement equipment, 3) chemical laboratory space, and 4) chemical processing equipment. This "smaller" facility would be comparable in size and cost to the preferred alternative. Such a facility would not, however, provide any flexibility to maintain our weapons stockpile.

The world is too dangerous and our future is too uncertain to eliminate the capability to maintain our stockpile. The preferred alternative is the logical choice.

James S. Morris
436 Old Sweetwater Rd
Sweetwater, TN 37874
Email: jmorris@processengr.com

1

Mueller, Heinz

Page 1 of 7

MD056

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

January 29, 2010

Ms. Pam Gorman
Y-12 SWEIS Document Manager
Y-12 Site Office
800 Oak Ridge Turnpike
Suite A-500
Oak Ridge, TN 37830

SUBJ: EPA Review and Comments on
Draft Site-Wide Environmental Impact Statement (DEIS)
Y-12 National Security Complex (DOE/EIS-0387) Project,
To Support the Stockpile Stewardship Program and to
Meet the Mission Assigned to Y-12, Oak Ridge, Tennessee
CEQ Number 20090368

Dear Ms. Gorman:

The U.S. Environmental Protection Agency (EPA), pursuant to Section 102(2)(C) of the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act, reviewed the subject DEIS for the Y-12 National Security Complex. The purpose of this letter is to provide EPA's NEPA review comments regarding the proposed project.

This DEIS evaluates alternatives for proposed new actions and changes subsequent to the 2002 Y-12 EIS ROD. The alternatives support modernization of the Y-12 facility, which began construction during World War II, with the majority of the floor space constructed before 1950. The DEIS evaluated five alternatives: No action; Uranium Processing Facility (UPF); Upgrade-in-Place; Capability-sized UPF; and no net production/capability-sized UPF.

The Capability-sized UPF (Alternative 4) is the DOE's preferred alternative. This alternative will maintain a basic manufacturing capability to conduct surveillance and to produce and dismantle secondaries (nuclear weapons components) and cases (which contain secondaries and other components). It would also provide for laboratory and experimental capabilities to support the stockpile, including uranium work for other National Nuclear Security Administration (NNSA) and non-NNSA customers.

The Complex Command Center (CCC) is also part of this alternative and the other action alternatives. The CCC would consist of a new facility for housing equipment and personnel including plant management, Fire Department, and the Emergency Operations Center (EOC).

Mueller, Heinz

Page 2 of 7

Construction of the Capability-sized UPF and CCC would require approximately 39 acres; this would occur on previously developed industrialized land at the Oak Ridge facility, including a parking lot. Land uses at Y-12 would remain compatible with surrounding areas and with the existing land use plan.

The DEIS states that radiation from normal operations would be below regulatory standards, with no statistically significant impact on the health and safety of workers and the public. Wastes generated from the facility would include liquid and solid low-level radioactive wastes (LLW), mixed-LLW, hazardous and nonhazardous wastes.

There are inherent environmental concerns regarding storage, transportation and disposal of hazardous waste and radioactive wastes, and the DEIS notes the need for continuing radioactive and hazardous materials and waste management, environmental monitoring to prevent ecological impacts, emergency preparedness, and radiological monitoring to ensure safety for workers and the public. Long-term onsite storage and disposition of wastes will need to be addressed as the project progresses.

Based on EPA's review of the preferred alternative in this DEIS, the project received a rating of "EC-2," meaning that environmental concerns exist regarding aspects of the proposed project and some clarifying information is requested for the Final EIS (FEIS). (See enclosed *Summary Of Rating Definitions And Follow Up Action*.) The EC-2 rating is based on the selection of the Capability-sized UPF Alternative. However, if a different alternative is ultimately pursued that would result in increased impacts, then additional NEPA evaluation could be expected by EPA.

We appreciate the opportunity to provide these comments. If you have questions, please coordinate them with Ramona McConney (404/562-9615).

Sincerely,

Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management

Enclosures: EPA review comments
Summary of Rating Definitions and Follow up Action

Mueller, Heinz

Page 3 of 7

EPA Review and Comments on
Draft Site-Wide Environmental Impact Statement (DEIS)
Y-12 National Security Complex (DOE/EIS-0387) Project,
To Support the Stockpile Stewardship Program and to
Meet the Mission Assigned to Y-12, Oak Ridge, Tennessee

General

1|12.L The proposed action will require continuing management of radioactive and hazardous materials and waste, environmental monitoring to prevent ecological impacts, emergency preparedness, and radiological monitoring to ensure safety for workers and the public. There are inherent environmental and worker safety concerns regarding storage, transportation and disposal of hazardous waste and radioactive wastes. Long-term onsite storage and disposition of wastes is a concern that will need to be addressed as the project progresses.

Purpose and Need

The DEIS describes the purpose and need for the action as modernizing the Y-12 facility to increase its cost-effectiveness and to supply future stockpile needs. The DEIS states that the majority of the existing floor space was constructed before 1950. Worker safety, protection, environmental and security concerns were cited, in addition to the need for increased flexibility and use of advanced technologies, while reducing costs and improving operating efficiencies.

Air Emissions

The DEIS states that all radiation doses from normal operations would be below regulatory standards. Consolidation and modernization of the facilities is expected to reduce accident risks. Ongoing radiological monitoring will be required at Y-12.

Water Resources

2|12.D Water supply for all the alternatives would come from the Clinch River, with no plans for withdrawal from groundwater. The site is expected to increase water usage during construction, with operational water use being approximately 1.2 billion gallons per year under the preferred alternative. Evaluation of potential water withdrawal impacts to the Clinch River during droughts should be evaluated in the FEIS.

Groundwater contamination from past activities onsite requires ongoing monitoring. The preferred alternative is not expected to impact groundwater quality.

3|12.D NPDES discharges from the Y-12 facility require ongoing monitoring. Regular monitoring and storm water characterization is required under the NPDES Permit. The Final EIS (FEIS) should include updated information regarding NPDES monitoring.

Mueller, Heinz

Page 4 of 7

Alternatives

The DEIS Summary document, page S-28, refers to Alternative 2 as the proposed action. Per our communication with the DOE, we understand that this statement is a misprint and that Alternative 4 is the DOE's preferred alternative/proposed action.

Ecological Impacts

The DEIS discusses the Agency for Toxic Substances and Disease Registry (ATSDR) fish consumption recommendation for the Clinch River, EFPC and Poplar Creek, based on the level of PCBs found in several local fish species, and associated with past Oak Ridge Reservation activities. The DEIS states that impacts from the new facilities to ecological resources are not anticipated, because the new facilities will be sited on previously developed land that does not contain habitats to support a biologically diverse species mix.

Waste Management

Under all the alternatives, Y-12 would continue to manage low-level radioactive waste (LLW), mixed LLW, polychlorinated biphenyl (PCB), hazardous wastes, and nonhazardous wastes. Three land disposal facilities are currently in operation at Y-12, and two more have been permitted and constructed. Hazardous waste sites at Y-12 are regulated under RCRA and CERCLA.

Environmental Justice (EJ)

Consistent with Executive Order 12898, potential EJ impacts were evaluated in this DEIS. The purpose of an EJ survey is to ensure equitable environmental protection regardless of the demographics, so that no segment of the population bears a disproportionate share of the consequences of environmental pollution attributable to a proposed project. The DEIS concludes that the project's short-term socioeconomic impacts would be positive, and that the project would not result in any disproportionately high and adverse effects to EJ populations.

Cultural Resources

The DEIS states that the Y-12 site includes a proposed National Register Historic District, consisting of buildings associated with the Manhattan Project, that are eligible for listing the in the National Register of Historic Places. Preservation of these cultural resources is planned. Coordination with the SHPO should be ongoing, and documented as the project progresses. The DEIS states that the evaluation and cultural resource recovery would be guided by plans and protocols approved by the SHPO in consultation with Native American tribes. The FEIS should include updated information regarding these coordination activities.

4|12.G

Mueller, Heinz

Page 5 of 7

4|12.G cont. If suspected cultural artifacts are encountered during the construction process for the proposed project, all construction activities should cease and the situation should be addressed in consultation with the SHPO.

Transportation

Transportation of radioactive materials and wastes is a concern. The preferred alternative would involve less radiological transportation impacts in comparison with the other alternatives. In addition, because of reduced production, less shipping of radioactive materials would take place and Y-12 would generate less radioactive wastes.

Threatened and Endangered Species

5|12.F No federally-listed nor state-listed threatened or endangered species are known to be at the Y-12 site. EPA defers to the FWS regarding endangered species assessments, and encourages the DOE to continue coordination with the FWS as appropriate.

Construction Impacts

The DEIS notes that construction activities would result in temporary traffic and noise increases at the Y-12 site. Construction impacts related to exhaust emissions from construction vehicles, equipment, and fugitive dust are disclosed in the document. We suggest that DOE consider the use of diesel retrofit technologies, such as diesel oxidation catalysts, to reduce the air quality impacts of diesel-powered equipment during the construction phase. The FEIS should clarify the expected timeline of construction.

Diesel Exhaust

6|12.C NIOSH has determined that diesel exhaust is a potential human carcinogen, based on a combination of chemical, genotoxicity, and carcinogenicity data. In addition, acute exposures to diesel exhaust have been linked to health problems such as eye and nose irritation, headaches, nausea, and asthma.

Although every construction site is unique, common actions can reduce exposure to diesel exhaust. EPA recommends that the following actions be considered for construction and operating equipment:

- Using low-sulfur diesel fuel (less than 0.05% sulfur).
- Retrofit engines with an exhaust filtration device to capture DPM before it enters the workplace.
- Position the exhaust pipe so that diesel fumes are directed away from the operator and nearby workers, thereby reducing the fume concentration to which personnel are exposed.
- A catalytic converter reduces carbon monoxide, aldehydes, and hydrocarbons in diesel fumes. These devices must be used with low sulfur fuels.

Mueller, Heinz

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6

- Ventilate wherever diesel equipment operates indoors. Roof vents, open doors and windows, roof fans, or other mechanical systems help move fresh air through work areas. As buildings under construction are gradually enclosed, remember that fumes from diesel equipment operating indoors can build up to dangerous levels without adequate ventilation.
- Attach a hose to the tailpipe of a diesel vehicle running indoors and exhaust the fumes outside, where they cannot reenter the workplace. Inspect hoses regularly for defects and damage.
- Use enclosed, climate-controlled cabs pressurized and equipped with high efficiency particulate air (HEPA) filters to reduce operators' exposure to diesel fumes. Pressurization ensures that air moves from inside to outside. HEPA filters ensure that any air coming in is filtered first.
- Regular maintenance of diesel engines is essential to keep exhaust emissions low. Follow the manufacturer's recommended maintenance schedule and procedures. Smoke color can signal the need for maintenance. For example, blue/black smoke indicates that an engine requires servicing or tuning.
- Work practices and training can help reduce exposure. For example, measures such as turning off engines when vehicles are stopped for more than a few minutes; training diesel-equipment operators to perform routine inspection and maintenance of filtration devices.
- When purchasing a new vehicle, ensure that it is equipped with the most advanced emission control systems available.
- With older vehicles, use electric starting aids such as block heaters to warm the engine, avoid difficulty starting, and thereby reduce diesel emissions.
- Respirators are only an interim measure to control exposure to diesel emissions. In most cases an N95 respirator is adequate. Respirators are for interim use only, until primary controls such as ventilation can be implemented. Workers must be trained and fit-tested before they wear respirators. Personnel familiar with the selection, care, and use of respirators must perform the fit testing. Respirators must bear a National Institute of Occupational Safety and Health (NIOSH) approval number. Never use paper masks or surgical masks without NIOSH approval numbers.

6|12.C cont.

Mueller, Heinz

Page 7 of 7

7

SUMMARY OF RATING DEFINITIONS AND FOLLOW UP ACTION*

Environmental Impact of the Action

LO-Lack of Objections
The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC-Environmental Concerns
The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impacts. EPA would like to work with the lead agency to reduce these impacts.

EO-Environmental Objections
The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU-Environmentally Unsatisfactory
The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS sate, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1-Adequate
The EPA believes the DEIS adequately sets forth the environmental impact(s) of the preferred alterative and those of the alternatives reasonably available to the project or action. No further analysis or data collecting is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2-Insufficient Information
The DEIS does not contain sufficient information for the EPA to fully assess the environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the DEIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3-Inadequate
EPA does not believe that the DEIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the DEIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the DEIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised DEIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640 Policy and Procedures for the Review of the Federal Actions Impacting the Environment

Mulvenon, Norman

Page 1 of 1

MD060

LOC INC
Oak Ridge Reservation
Local Oversight Committee

January 12, 2010

Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike
Suite A-500
Oak Ridge, TN 37830

Subject: Draft Site-Wide Environmental Impact Statement (SWEIS) for the Y-12 National Security Complex

Dear Ms. Gorman:

The Citizens' Advisory Panel (CAP) of the Oak Ridge Reservation Local Oversight Committee (LOC) has the following comments on the draft SWEIS for Y-12.

1|7.0 After attending the public meetings and reviewing the document, the CAP supports the preferred alternative (Alternative 4) of a capability-sized Uranium Processing Facility (UPF). In particular, the CAP sees a major environmental benefit from moving out of the old facilities, which would allow them to be decommissioned and demolished and the underlying soils remediated. We also appreciate that a new UPF will be safer for the workers and for the community, as well as saving money during continued operations.

2|2.G The CAP had identified what appears to be an error in the document. Figure 5.1.1-2 does not indicate any significant excess or new construction facilities (for example, the UPF is not labeled as new construction) expected for 2018, and facilities that are planned to be replaced are still labeled as operating. Please review and correct this figure.

The CAP appreciates the opportunity to review the draft SWEIS for Y-12.

Sincerely,

Norman A. Mulvenon
Chair, LOC Citizens' Advisory Panel

cc: LOC Document Register
LOC Board
LOC CAP
John Owsley, Director, TDEC DOE-O
Pat Halsey, FFA Coordinator, DOE ORO EM
Ted Sherry, Manager, Y-12 Site Office, NNSA
Amy Fitzgerald, City of Oak Ridge
Ron Murphree, Chair, ORSSAB

Anderson • Meigs • Rhea • Roane • City of Oak Ridge • Knox • Loudon • Morgan

102 Robertsville Rd., Suite B • Oak Ridge, Tn 37830 • Phone (865) 483-1333 • (888) 770-3073 • Fax (865) 482-6572 • loc@lcx.net • www.local-oversight.org

Munger, David

Page 1 of 1

WD082

[redacted]

From: Gorman, Pamela (P1G) [gormanpl@yso.doe.gov]
Sent: Wednesday, November 25, 2009 9:40 AM
To: Buenaflor, Delight; Rose, Jay
Subject: FW: UPF Project Public Comment

Importance: High

[redacted]

[redacted]

From: Dave Munger [mailto:dave.munger@merrick.com]
Sent: Tuesday, November 24, 2009 4:37 PM
To: Gorman, Pamela (P1G)
Subject: UPF Project Public Comment

Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike
Suite A-500
Oak Ridge, TN 37830

Ms. Gorman:

1|3.B I would like to go on record as supporting the need for a new, consolidated Uranium Processing Facility (UPF) at the Y-12 National Security Complex. I have seen the condition of the current facilities and believe that the nation cannot afford to put in jeorpady our nuclear security by the continued long-term use of obsolete facilites. Please include me in the list of strong supporters of the project.

Regards,

David H. Munger
795 Nichols Road
Lenoir CIty, TN 37772

1

Murphy, Jennifer

WD088

[redacted]

From: Jennifer Murphy [Jennifer@jmurphyart.com]
Sent: Wednesday, January 27, 2010 11:55 AM
To: DIV.Y12SWEIS.Comments
Subject: Draft Y-12 SWEIS

I am against any new projects at the Y-12 site who's purpose will be building nuclear weapons.

1|9.A I prefer the OREPA (Oak Ridge Environmental Peace Alliance) Alternative 6, which would cost 100 million and would not include the actual making of nuclear bombs at the facility.

2|3.A It is senseless and irresponsible to spend billions on a facility which, by the time it is completed in 2018, will no longer be needed because the US stockpile of "life extended" warheads will exceed the number allowed by the START treaty at that point.

3|12.H I am also very concerned about the 2,500 jobs that would be lost in Oak Ridge with the new facility, since it would be largely automated.

Thank you for your consideration of these points.

Jennifer Murphy
95 Blue Ridge Ave.
Asheville, NC 28806

Myers, Stacy

WD052

[redacted]

From: Stacy Myers [scmyers@msn.com]
Sent: Friday, December 11, 2009 2:09 PM
To: DIV.Y12SWEIS.Comments
Subject: Modernization of Y-12

Dear Ms. Gorman,

1|3.B I am writing in support of the future modernization of the Y-12 plant in Oak Ridge, TN. Specifically I would like to speak in support of the construction and operation of a new uranium processing facility (UPF) that would have a reduced capacity while maintaining all enriched uranium processing capabilities. In addition I would like to speak in support of a new Complex Command Center (CCC).

2|13.0 Currently it is my understanding that even if we do not build any new nuclear weapons, we have a 20 year backlog of work in dis-assembly that would require a UPF. It seems obvious to me that the Y-12 facility is the most appropriate place to do that. We have the space, technology, and people that understand this vital work.

In addition, I would support the construction of a new emergency management facility generally referred to as the Complex Command Center (CCC). For many reasons that I am sure you have heard, this facility should be built on an easily accessibly site, be on the public tax roles, and capitalize on the sizable investment already made in emergency management on the Oak Ridge Reservations.

Thank you for your time and the opportunity to express this support.

Stacy C. Myers

Stacy C. Myers, Ph.D., President Advanced Management, Inc. 1936 Oak Ridge Turnpike Oak Ridge, TN 37830 Phone: 865-483-9500 Fax: 865-483-6655 Email: scmyers@msn.com Web: www.ami-tn.com

Nobles, Jim

Page 1 of 2

MD034

Draft Y-12 Site-wide
Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010.

1|13.0 My name is Jim Nobles, a resident of Anderson County and the city of Clinton. I'd like to express my support for NNSA's preferred alternative – construction of a new UPF and a new CEC

2|3.B A new UPF is needed for the continued protection of the environment, its citizens, our nation, and in fact, the world. The processes used to work with materials that have become fundamental to the protection and position of our country have improved through advances in knowledge and technology. A new facility is required to maintain safety and security, while taking advantage of efficiencies that have not been available before.

The benefits of a new UPF will also be seen in the form of deterrence. Our country is where it is today, a recognized world leader, free, offering unlimited opportunities for all who would choose to reside here, largely because of the responsibility and commitment to develop certain resources and use them responsibly. To think that Oak Ridge, East Tennessee, or the USA would be better off with less capability in this area,

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:
http://www.Y12sweis.com

Nobles, Jim

Page 2 of 2

Draft Y-12 Site-wide
Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010.

while optimistic, is impractical and somewhat naive. In fact, by having the opportunity to comment on this alternative, is a testimony to the value and importance of us maintaining an adequate nuclear capability. Consequently, it is not only necessary, but imperative, that we further develop our capabilities to safely and more efficiently process uranium and other materials required not only for the enduring security of the USA, but to ensure the continued quality of life that we all have come to enjoy and expect.

2|3.B (cont)

Jim Nobles
105 Sapphire Ct.
Clinton, TN 37716

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@tetratech.com

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http://www.Y12sweis.com

O'Neil, Kay

Page 1 of 1

WD075

[redacted]

From: Sisters Michelle & Kay [sistersmandk@mchsi.com]
Sent: Monday, January 25, 2010 2:21 PM
To: DIV.Y12SWEIS.Comments
Subject: Form posted from Windows Internet Explorer.

firstName=Kay
lastName=O'Neil
organization=Presentation Sisters Justice email=sistersmandk@mchsi.com
address1=203 Swan Street
address2=
city=Le Sueur
state=MN
zip=56058
country=
subject=Draft Y-12 SWEIS

1|9.C comments=We are praying and begging you to halt new nuclear weapons projects. Our U.S. nuclear weapons policies appear to be running in contrary directions. President Obama has a vision for nuclear disarmament--so do we! These plans for Oak Ridge will not contribute to disarmament. We have visited Oak Ridge and have carefully studied and prayed about these plans!NO NO NO...As Dr. Martin Luther King said the night before his assassination: "It is no longer a choice between violence and nonviolence. It is nonviolence or non-existence!" Please put your energies in the new moment for nuclear disarmament, not nuclear advancement.

2|14.0 peace, Sister Kay O'Neil

1

Oehler, Susan

Page 1 of 1

MD027

December 7, 2009

Pam Gorman
Y-12 SWEIS Document Manager
Y-12 Site Office
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Dear Ms. Gorman:

1|3.A I want to see a world free of nuclear weapons. I think all the children of the world have a right to live without fear or harm from nuclear weapons. In light of that goal, I think there is no need to build a new bomb plant at Oak Ridge. I also do not believe there is any need to refurbish old warheads or provide modifications to extend the life of current warheads.

2|9.A I would like to see you follow an alternative that reflects the current policy of the US as expressed by President Obama – that is passive curatorship of the current stockpile to assure safety and security. This can be done in the same facilities currently at Y-12 by upgrading and consolidating the facilities.

3|1.E There is no need for a new uranium bomb plant. If we continue with building and updating nuclear weapons, then so will Russia, and nuclear proliferation will continue. A policy that attempts to discourage other nations from pursuit of nuclear capability while expanding our own capacity to proliferate our own arsenal is duplicitous and inevitably counterproductive.

4|9.B The future of Oak Ridge is in dismantling tens of thousands of nuclear weapons. I hope this is the path you choose to follow.

Thank you for your time.

Sincerely,

Susan Oehler

Susan Oehler
2605 Vineyard Blvd
Asheville NC 28805

Oliver, Ann

Page 1 of 1

MD006

Please consider my request for your endorsement of OREPA's Alternative 6. 1|9.A

I strongly object to war weapons in this day of no-win, over priced, high civilian casualty, in-humane, and arrogant-seeming conflicts.

Thank you for this opportunity to speak. Sincerely,

Ann McCulloch Oliver

Ownby, Greta

Page 1 of 1

OR2D02

Draft Y-12 Site-wide Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010.

1|7.0 I support the preferred alternative (4) for the Uranium Processing Facility at the Y12 Plant in Oak Ridge, Tenn.

Greta Ownby
234 Park Meade Place
Oak Ridge Tn 37830

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@tetratech.com

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http://www.Y12sweis.com

Owsley, John

Page 1 of 3

MD063

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DOE OVERSIGHT DIVISION
761 EMORY VALLEY ROAD
OAK RIDGE, TENNESSEE 37830-7072

January 25, 2010

Pam Gorman
Y-12 Site Office
800 Oak Ridge Turnpike
Suite A- 500
Oak Ridge, TN 37830

Dear Ms. Gorman

National Environmental Policy Act (NEPA), Draft Site-Wide Environmental Impact Statement (SWEIS) for the Y-12 National Security Complex (DOE/EIS-0387)

The Tennessee Department of Environment and Conservation, DOE Oversight Division has reviewed the above subject document in accordance with the NEPA-associated regulations of 40 CFR 1500-1505 and 10 CFR 1021, as implemented.

General Comments

1|7.0 DOE's preference for Alternative 4 seems reasonable.

Discussions of disposal of LLW and MLLW should include more potential options for disposing of this waste.

The status of down-blending operations at Y-12 is difficult to discern from the document. Will the proposed UPF include increased down-blend capacity?

Specific Comments

2|2.G **Section, 3.2.2.1.1**
Is ARGUS an acronym? If so, please define.

Section, 3.3.5
Is the area in which the construction is taking place contaminated with mercury (Hg)? Will soils excavated during construction require treatment?

Page 4-84 Groundwater Treatment Facility paragraph
Please correct the sentence in the paragraph that reads as follows: "The Groundwater Treatment Facility treats wastewater from the Liquid Storage Facility at Y-12 seep water collected at East

Owsley, John

Page 2 of 3

Gorman Letter **Page 2**
January 25, 2010

Chestnut Ridge waste piles to remove Volatile Organic Compounds (VOCs), non-VOCs, and iron and elsewhere." Please clarify the "and elsewhere" portion of this sentence.

Table 5.12.2.2-4. Current Fish Advisories page 5-79

2|2.G cont. This table is not correct because the reservoirs do not match with the counties as listed. Please correct the information.

Section, 5.3
The power requirements are presented as annual usage in Table 5.1.1-1 but are presented as monthly consumption for Alt 2 and as a percentage of the No Action alternative usage for all the other alternatives. These numbers should be presented on a consistent basis to facilitate comparison between alternatives.

Section, 5.7.2.2 Operation
This section states that the UPF operation would require 105 million gallons of water per year, about 5 percent of the 2 billion gallons required by Alt 1. It goes on to say that overall use would decrease from 2 billion gallons per year to 1.3 billion gallons per year. If overall use and operations for the No Action alternative are the same (2 billion gallons per year), how come the UPF alternative increases overall use by 1.2 billion gallons per year? If the UPF operation requires only 5 percent of the No Action Alternative water usage, will the discharges into East Fork Poplar Creek (EFPC) also be 5 percent of the current discharge? How will this affect the raw water addition from the Clinch and what will be the impacts of this on EFPC? The effects of reduced discharges also need to be evaluated for Alternatives 4 and 5.

Table 5.13-1
Why would the document show the 2007 baseline waste generation as the construction waste for Alternative 1? The next table shows the same numbers as operations waste. If there is no construction involved in implementation of the No Action Alternative, then the column entries should say "None" rather than presenting the operations generated waste as construction generated.

Page 5-16, Paragraph 4, Line 2
The number of monitored workers for the Capability-sized UPF Alternative given here (about 3,680) does not agree with the number of monitored workers for that alternative given in Table 3.2.4-1 on page 3-24 (i.e., 1,825).

Page 5-16, Paragraph 6, Line 2
As above for the Capability-sized UPF Alternative, the number of monitored workers for the No Net Production/Capability-sized UPF Alternative (about 3,300) does not agree with the number of monitored workers for that alternative given in Table 3.2.5-1 on page 3-25 (i.e., 1,600).

Owsley, John

Page 3 of 3

Gorman Letter
January 25, 2010

Page 3

Page 5-57, Paragraphs 1, 3 & 4
For the UPF Alternative, Capability-sized UPF Alternative, and No Net Production/Capability-sized UPF Alternative, it is indicated that "Water usage for operations would be the same as the No Action Alternative". This does not seem to be true as annual water usage at Y-12 for the three alternatives is significantly less than for the No Action Alternative.

2|2.G cont.

Page 5-79, Table 5.12.2.2-4. Current Fish Advisories
All the information provided for Melton Hill Reservoir is actually data for Fort Loudon Reservoir, which was not included in this Table. Fort Loudon Reservoir should be included here and the data for Melton Hill Reservoir corrected.

If you have any questions concerning these comments, please contact Chudi Nwangwa or me at 865-481-0995.

Respectfully

John A. Owsley, Director

cc Chuck Head, TDEC
Mary Parkman, TDEC

jao966

Patterson, Devin

Page 1 of 1

OR2D06

Draft Y-12 Site-wide Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

SUBMITTED BY:
DEVIN PATTERSON
100 UNION VALLEY
OAK RIDGE, TN
37830

Written Comment Form

Must be received on or before January 29, 2010.

DEVIN PATTERSON - NETGAIN CORPORATION.

NETGAIN CORPORATION HAS APPROXIMATELY 150 EMPLOYEES DISTRIBUTED ACROSS SEVERAL NNSA SITES INCLUDING THE NNSA SERVICE CENTER, Y-12, AND LAS VEGAS. NETGAIN SUPPORTS A CADRE OF PERSONNEL SECURITY, SUBSTANCE ABUSE TESTING, AND OCCUPATIONAL HEALTH SERVICES FOR THE NNSA AND PROTECTION OF SPECIAL NUCLEAR MATERIALS.

1|13.0 NETGAIN CORPORATION WHOLLY SUPPORTS EFFORTS TO INCREASE NUCLEAR MATERIAL PROTECTION, NON PROLIFERATION, AND HUMAN RELIABILITY AND PERSONNEL SECURITY PROGRAMS FOR THE NNSA Y-12 SITE AND THE NNSA IN ITS ENTIRETY.

-DEVIN PATTERSON

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:
http://www.Y12sweis.com

Peterson, Allan

Page 1 of 1

WD010

[redacted]

From: Allan Peterson [apeterson71@mchsi.com]
Sent: Tuesday, November 17, 2009 3:34 PM
To: DIV.Y12SWEIS.Comments
Subject: No New Bomb Facility for Oak Ridge

firstName=Allan
lastName=Peterson
organization=
email=apeterson71@mchsi.com
address1=5397 Soundside Drive
address2=
city=Gulf Breeze
state=FL
zip=32563
country=United States
subject=Draft Y-12 SWEIS
comments=I am against the building of an enormous and enormously expensive facility that will spur another pointless arms race. 1|3.A
We hardly need a larger arsenal and "streamlining" is no rationale.
No more bombs no more militaristic solutions to everything.
Building more nuclear capability while decrying other country's attempting to do the same is counterproductive and hypocritical. 2|1.E

1

Phillips, J.L.

Page 1 of 1

MD054

Draft Y-12 Site-wide
Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

NNSA National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010.

I would like to support option #2. It would be vital to the economic health of our area. We (y-12) are the most qualified site for UPF. 1|5.0

Thank you
J.L. Phillips #51339

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:
http://www.Y12sweis.com

Pomerat, Dixie

Page 1 of 1

WD089

[redacted]

From: D Pomerat [pommill@bellsouth.net]
Sent: Wednesday, January 27, 2010 1:07 PM
To: DIV.Y12SWEIS.Comments
Subject: Build Jobs Not Bombs

1|9.A Don't build a costly, high-maintenance nuclear facility here. Build the OREPA alternative 6, which would cost 100 million and would not include the actual making of nuclear bombs in Oak Ridge.

Dixie Pomerat

1

Price, Jr., James

Page 1 of 1

MD038

To whom that will take the time to read with an open mind.

1|13.B I am very proud of this country and feel we have things here under control with the technology and the ability to protect her and all she stands for. The infrastructure required to maintain the stability of this country is becoming weathered and out dated. The need to reinforce the security and technology for these processes will require us to move forward to insure we not only continue to grow and maintain stability for our own but for the others around this ever changing world that depend on us having the ability to protect freedom. We as others do not ever want to make the decision to deploy equipment that has the ability to devastate others. But in the world as it is today the need to have if only as a deterrent is a necessity. My father once told me a man that wants a war in most cases has never been in one. I feel the United States having the ability to defend from major aggression has played a large part in keeping this country free. We cannot turn our backs on all that have served and defended and gave their lives for this county and many other countries. The thing that keeps us going is, when we look behind us America is there. I would hate to think how it would have all turned out if we had not used this technology to defend ourselves and all that was saved from the aggression in WWII.

2|13.0 I hope I have addressed the issue at hand and the need for this country to go forward and continue to maintain the ability to defend. The need is now, process facilities and infrastructure are becoming obsolete, costly to maintain and unsafe. The Y12 team has been working on an approach to takes us into the future needs of this process. Help us continue our progress and allow this project to move forward.

We have elected all of you as our voice and as our protectors. Give us the ability to contribute to the protection of those that live and choose to live in Freedom and Democracy.

Just one more team of proud Americans doing the best we can. Signed: James H. Price Jr.

Ragsdale, Michael

Page 1 of 1

MD009

OFFICE OF COUNTY MAYOR MIKE RAGSDALE

400 Main Street, Suite 615, Knoxville, TN 37902

November 12, 2009

Ms. Pam Gorman
Y-12 SWEIS Document Manager
Y-12 Site Office
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Dear Ms. Gorman,

1|13.0 I am writing you in support of the proposed Uranium Processing Facility (UPF) at the Y-12 National Security Complex in Oak Ridge. This facility will be another anchor to the modernization initiative currently underway at Y-12. The draft Site-Wide Environmental Impact Statement (EIS) presents this as the preferred option from several alternatives considered. This letter documents Knox County's full support of this preferred capability based option.

Knox County with a population of 420,000 currently is home to about 45% of the DOE and NNSA regional workforce. Our county and region have always been strong supporters of the uranium processing and nuclear related missions of the Oak Ridge complex. Our region has invested in the development of a highly skilled workforce that has always been responsive to the safe conduct of the operations associated with these missions for more than 60 years. We are prepared to continue to fully support such missions and to continue to invest in regional workforce development that is required for these operations. We do believe that Y-12's continued role in manufacturing and 2|3.B disassembling nuclear warhead components should be conducted in modernized facilities with cost effective and safety focused processes. We think this preferred option of a new UPF achieves this objective.

Thank you for your consideration of these comments. Please include them in the official record of this EIS.

Best Regards,

Mayor Ragsdale
Knox County Mayor

MRR.krm

cc: Ted Sherry
Congressman John Duncan
Congressman Lincoln Davis
Congressman Zach Wamp
Senator Bob Corker
Senator Lamar Alexander

county.mayor@knoxcounty.org • ph.865.215.2005 • fax 865.215.2002

Reaves, Candance

Page 1 of 1

WD012

[redacted]

From: Candance Reaves [bardgirl@mac.com]
Sent: Tuesday, November 17, 2009 2:06 PM
To: DIV.Y12SWEIS.Comments
Subject: confurmation

firstName=Candance
lastName=Reaves
organization=
email=bardgirl@me.com
address1=1451 Ellejoy Rd.
address2=
city=Seymour
state=TN
zip=37865
country=USA
subject=Draft Y-12 SWEIS
1|14.0 comments=I am very opposed to ANY new weapons involving nuclear power. The world is a fragile enough place right now for more of this madness to continue. I vote. I speak out, and I will oppose this project.
drafts=Draft SWEIS Summary

1

Reiter, Jendi

Page 1 of 1

WD015

[redacted]

From: Jendi Reiter [JBReiter@aol.com]
Sent: Tuesday, November 17, 2009 3:47 PM
To: DIV.Y12SWEIS.Comments
Subject: Form Post from Firefox

firstName=Jendi
lastName=Reiter
organization=
email=JBReiter@aol.com
address1=351 Pleasant St.
address2=PMB 222
city=Northampton
state=MA
zip=01060
country=USA
subject=Draft Y-12 SWEIS
1|10.D comments=I am writing to oppose the proposed nuclear weapons complex in Oak Ridge, TN. Especially during this time of fiscal crisis, we should spend our taxpayer dollars on healthcare and adequate food and shelter for
2|14.0 the poor, not on stockpiling more weapons that could wipe out life on earth.

1

Rickenbach, Nancy

Page 1 of 1

WD091

[redacted]

From: wrtavi@charter.net
Sent: Wednesday, January 27, 2010 3:23 PM
To: DIV.Y12SWEIS.Comments
Subject: Draft Y-12.SWEIS

1|14.0 Don't build anymore weapons of mass destruction. Convert Y12 to peaceful purposes. We already have enough bombs. Stop the madness. President Obama supports the push toward greater nuclear disarmament.
2|9.c This proposal is going against this sentiment. We Americans have so many problems to solve, people to help, peace to achieve. Stop the bombs.

Nancy Rickenbach
1144 N. Panther Creek Rd.
Sevierville, TN 37876

1

Rimel, George

Page 1 of 1

OR2D05

11/18/09

For the record, my name is George Rimel I live within six miles of the Y-12 plant ,I spend most of my paycheck within twenty miles of Y-12 plant Oak Ridge TN. I have spent the Last (34) years proudly making BOMBS not to be used, but as a deterrent. Freedom is not free and whatever the price of Option # 4 is it is cheep. I witnessed many religious and emotional appeals as to the Evils of the bomb making business and those who work in the trade that we cause harm to the environment and that little children to have nightmares. The truth is that option # 4 will maintaine the Status-Quo in World politics and in defense Of the UNITER STATES of AMERICA to who I freely give my total support. I have been inside most of the buildings in Y-12 and will testify under oath that the workforce does a superb job with resources allotted to them. Since 1977 when I started, the workforce Health/Safety and environmental issues have risen to the top and exceed any other place that I have worked. The need for a new and modern facility is paramount to the mission of National Defense, Environmental clean up and cost effectiveness of private business model. As we debate this issue, men, women, children, and the environment is dying not from Nuclear Bombs but at the hands of evil men who plan the same for us. The Nuclear deterrent is the gate keeper to freedom of this nation and entire world. I believe we have demonstrated good stewardship of our arsenal as (0) used since Japan.

1|7.0

2|3.B

3|13.0

Thank you,
George Rimel
1538 Oak Ridge Hwy
Clinton TN. 37716

Roberts, Stan

Page 1 of 1

WD001

[redacted]

From: Roberts, Stan L (XRT) [robertssl@y12.doe.gov]
Sent: Wednesday, October 28, 2009 5:25 PM
To: DIV.Y12SWEIS.Comments
Subject: Form posted from Windows Internet Explorer.

firstName=Stan
lastName=Roberts
organization=
email=roberts616@comcast.net
address1=510 Melton Hill Dr
address2=
city=Clinton
state=TN
zip=37716
country=
subject=Draft Y-12 SWEIS
comments=As a resident of Anderson County, I strongly support the recommendations made in the Draft SWEIS related to Y-12 and its future operations, including building the UPF at Y-12.

1|13.0

1

Roberts, Stan

Page 1 of 1

WD005

[redacted]

From: Roberts, Stan L (XRT) [robertssl@y12.doe.gov]
Sent: Thursday, November 12, 2009 1:05 PM
To: DIV.Y12SWEIS.Comments
Subject: sweis-in favor of alternative 2

1|5.0 | I am an Anderson County resident and I fully support Alternative 2- build the UPF and the CCC.

Stan Roberts
510 Melton Hill Dr
Clinton TN 37716

1

Roe, Donald

Page 1 of 2

WD046

[redacted]

From: Don Roe, Attorney [roelaw@bellsouth.net]
Sent: Tuesday, December 01, 2009 1:55 PM
To: DIV.Y12SWEIS.Comments
Cc: williamssmf@y12.doe.giv
Subject: Y-12 Site Wide Environmental Impact Statement
Attachments: Public Comment on Y12 Site Wide EISStatement in Support of.pdf

I am submitting the attached comments regarding the subject EIS.

Donald B. Roe, Attorney

1

Roe, Donald

Page 2 of 2

WD046

Public Comment on Y-12 Site Wide EIS
Statement in Support of UPF

Donald B. Roe

I am a resident of Oak Ridge, Tennessee, and have lived here since 1947. I am an attorney currently in private practice in Oak Ridge. I have previously worked during the 1970's at the Y-12 Plant and the K-25 Plant. Therefore, I have some knowledge of the work at these plants.

I fully support Alternative 4, "Capability-Sized UPF Alternative" for the following reasons:

1. Y-12 has been in operation dealing with highly enriched uranium and production of related parts for nearly 67 years. This plant has extensive experience in working with enriched uranium processing and has been a safe and secure location for those activities.

2. The community in Oak Ridge is experienced with enriched uranium processing, understands from a layman's point of view this type of operation, and has confidence in the process.

1|7.0

3. The community is supportive of the nation's nuclear energy and defense programs.

4. The nation needs, and will continue to need, the technology and expertise connected with enriched uranium processing. The Y-12 Site is the most logical and economic site for these facilities. Nearby ORNL will enhance the research activities that may be connected with Y-12.

5. Construction of a new Complex Command Center to house Y-12's site and emergency management operations is essential. Modernization of these activities will provide better security and safety.

6. Maintaining all enriched uranium processing capabilities is crucial to our country. Failure to keep these capabilities would result in technology being developed in other parts of the world that would render us dependant on foreign countries.

7. The Y-12 Plant was the first to provide enriched uranium processing, and should continue to be the leader in this field.

Respectfully submitted,

_____

Donald B. Roe
14 Kentucky Ave
Oak Ridge, TN 37830

Rohlf, Gerard

Page 1 of 1

WD017

[redacted]

From: Rohlf, Gerard [gerard.rohlf@fiserv.com]
Sent: Tuesday, November 17, 2009 5:59 PM
To: DIV.Y12SWEIS.Comments
Subject: Form posted from Windows Internet Explorer.

firstName=Gerard
lastName=Rohlf
organization=
email=gerard.rohlf@fiserv.com
address1=503 Greendale Avenue
address2=
city=Pittsburgh
state=PA
zip=15218
country=Allegheny
subject=Draft Y-12 SWEIS
1|3.A comments=Don't do it! We are trying to reign in the proliferation of nuclear weapons. That is what needs to be done. Building a new facility to fabricate more of these monstrous creations is like an insane vision dreamed by a lunatic. Just don't do it!

1

Roquemore, Wayne

Page 1 of 1

WD081

[redacted]

From: Wayne Roquemore [wroquemore@lawlerwood.com]
Sent: Tuesday, January 26, 2010 9:38 AM
To: DIV.Y12SWEIS.Comments
Subject: Y-12 SWEIS

Ms. Pam Gorman:
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike
Suite A-500
Oak Ridge, TN 37830

Dear Ms. Gorman:

1|7.0 On behalf of Lawler-Wood Y-12, LLC and myself, I am writing to express support for the Capability-Sized UPF Alternative. I have heard many of the comments for and against a new UPF. The arguments against a new UPF, while admirable in their intent, are not grounded in facts or reality. Nuclear weapons will be a part of the international landscape for many, many years. As long as the U.S. maintains a nuclear arsenal, we need a capability-sized UPF. If we continue to reduce the stockpile, we need a capability-sized UPF. If we eliminate all nuclear weapons from the arsenal, we need to maintain the capability to enrich uranium. The current facilities are old, unsafe, inefficient, expensive to operate and maintain and very expensive to secure.

2|3.B Having a uranium processing capability is essential for national security. I believe a new capability- sized UPF is the best option to meet our national security goals. I strongly recommend modernization of Y-12 to support the Stockpile Stewardship Program and the construction of a Capability-Sized UPF.

Thank you for the opportunity to express my opinion and that of Lawler-Wood Y-12, LLC.

/signed/
J. Wayne Roquemore, President
Lawler-Wood Y-12, LLC

Wayne Roquemore
Lawler-Wood, LLC
865-549-7475
wroquemore@lawlerwood.com

1

Ross, Ann

Page 1 of 1

MD015

Draft Y-12 Site-wide
Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

NNSA

Written Comment Form
Must be received on or before January 29, 2010.

1|13.0 I support bringing the Y-12 Uranium
Processing facility To Oak Ridge, Tn.
2|12.H I think it will be a huge asset
to our area, our economic development,
would match up well with the other
1|13.0 (cont) programs, research, development already
taking place in the Oak Ridge
area.

Ann Ross

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@jacobs.com

You may also submit comments through the project website which can be found at:
http://www.Y12sweis.com

Rugh, Jim

Page 1 of 1

WD080

[redacted]

From: Jim Rugh [jimrugh@mindspring.com]
Sent: Tuesday, January 26, 2010 7:43 AM
To: DIV.Y12SWEIS.Comments
Subject: Form Post from Firefox

firstName=Jim
lastName=Rugh
organization=
email=jimrugh@mindspring.com
address1=451 Rugh Ridge Way
address2=
city=Sevierville
state=TN
zip=37876
country=USA
subject=Draft Y-12 SWEIS
comments=America's hypocrisy -- preventing other countries from acquiring nuclear weapons
1|1.E while expanding our own arsenal -- will backfire. It will only encourage others to expand their own capacities to resist US hegemony.

1

Sabbe, Michael

Page 1 of 1

OR1D04

Draft Y-12 Site-wide Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

NNSA National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010

1|13.0 I fully support the urgent need to proceed with construction of the UPF and CCC at the Y12 PLANT.

Michael A. Sabbe
M A. Sabbe

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at http://www.Y12sweis.com

Schilken, Rege

Page 1 of 1

WD020

[redacted]

From: RegeHSchilken@aol.com
Sent: Tuesday, November 17, 2009 6:05 PM
To: DIV.Y12SWEIS.Comments
Subject: Stop nuclear facilities and experimentation!

1|1.E Please do unto others as you'd be done to!
How dare we tell others to stop building nuclear facilities or experimenting with nuclear weapons when our country continues to increase its technology.
One nation under God -- This must have been meant as a joke from our founding fathers.

Let's not make a sham of it!

1

Schroeder, Helen

Page 1 of 1

WD002

[redacted]

From: Robert & Helen Schroeder [hero89@charter.net]
Sent: Thursday, October 29, 2009 10:50 AM
To: DIV.Y12SWEIS.Comments
Subject: Form Post from Firefox

firstName=Helen
lastName=Schroeder
organization=Pax Christi
email=hero89@charter.net
address1=1502 9th Ave, NE
address2=
city=Rochester
state=MN
zip=55906
country=USA
subject=Draft Y-12 SWEIS
1|14.0 comments=I'm strongly opposed to the building of this plant. It seems so wrong when we are trying to work toward nuclear disarmament. Think what other countries will think. No wonder they want nukes themselves!
drafts=Draft SWEIS Summary

1

Scobie, Jill

Page 1 of 1

WD031

[redacted]

From: Jill Scobie [jill@scobie.net]
Sent: Wednesday, January 27, 2010 8:26 AM
To: DIV.Y12SWEIS.Comments
Subject: Please use OREPA alt 6

1|9.A The last thing we need is a nuclear bomb making facility upgrade at Oak Ridge TN. PLEASE choose OREPA alternative 6.

Thank you,

Jill Scobie
248 John Tate Dr
Fletcher, NC 28732

1

Sellers, Cynthia

Page 1 of 1

WD095

[redacted]

From: CJ S [c.j.sellers.v07@gmail.com]
Sent: Thursday, January 28, 2010 4:06 PM
To: DIV.Y12SWEIS.Comments
Subject: Draft Y–12 SWEIS Comments

Draft Y–12 SWEIS comments by Cynthia Sellers, P.O. Box 290, Rutledge, TN 37861

Thank you for the opportunity to comment on the environmental impact of the Y-12 SWEIS. My comments are to the impact of these changes on humans, not just locally but around the world. Many of the proposed changes to Y-12 as shown in the Draft SWEIS take us in the wrong direction at this point in time. Adopting those options would be bad domestically as American citizens are hurting from the recession, lack of insurance coverage, loss of manufacturing jobs and unemployment is high. We still have a rough road ahead toward recovery. This expenditure will not produce more jobs. To spend this much money when Y-12's practical needs could be addressed much more cheaply and effectively and in harmony with President Obama's efforts to reduce the nuclear stockpile, seems like an abuse of the public trust. Further, it sends the wrong message to the world at a time when our image is finally starting to improve due to President Obama's stance regarding nuclear proliferation.

1|10.B

2|1.E We have an opportunity in President Obama to make a clean break from Bush-era militarism and improve our friendship with other countries, allies and potential allies alike. The amount of money spent on this project could be put to much better use. OREPA has put forth a more economical solution in Alternative 6 and it should be fully analyzed in the SWEIS:

3|9.A "Passive curatorship of the current stockpile to assure safety and security can be performed in consolidated, down-sized, upgraded existing facilities at Y-12. An annual throughput of 5 secondaries a year or less is sufficient to provide assurances of the safety, security and reliability of the stockpile as it awaits eventual dismantlement. A new dismantlement facility, with designed-in safeguards and transparency, should be built to accommodate the increased throughput of retired warhead secondaries and cases; the new facility should be sized to accommodate a throughput of the current backlog in 5-7 years and dismantlement of the entire US arsenal in 35-40 years." ~www.stopthebombs.org

Alternative 6 is the only Alternative that reflects the policy goals expressed by the President of the United States:
"In the middle of the last century, nations agreed to be bound by a treaty whose bargain is clear: All will have access to peaceful nuclear power; those without nuclear weapons will forsake them; and those with nuclear weapons will work towards disarmament. I am committed to upholding this treaty. It is a centerpiece of my foreign policy. And I'm working with President Medvedev to reduce America and Russia's nuclear stockpiles."
~President Barak Obama
http://nobelprize.org/nobel_prizes/peace/laureates/2009/obama-lecture_en.html

1

Shelton, Ronald

Page 1 of 1

WD111

[redacted]

From: sheltonron@comcast.net
Sent: Friday, January 29, 2010 5:26 PM
To: DIV.Y12SWEIS.Comments
Cc: sheltonron@comcast.net
Subject: Draft y-12 SWEIS Comments

To: Ms. Pam Gorman, Y-12 SWEIS Document Manager

1|7.0 I am writing to voice my complete support for NNSA's preferred alternative - the number 4 Capability-Sized UPF Alternative.

As a mechanical engineer, I have spent a wonderful career in aerospace and manufacturing. I am retired from Oak Ridge National Laboratory and continue to live in Oak Ridge. I maintain a strong interest in the engineering world, mentoring and supporting young people with an interest in science and technology.

Since 1995, the infusion of new Y-12 managerial talent and the creation of NNSA has brought about the highest level of competent workforce and forward looking vision. The successful completions of the Jack Case Center, New Hope Center, and HEUMF are a tribute to that vision and hard work. The brain drain has ended, the ability to competitively hire young staff has been created.

The UPF project is critical to the US. It modernizes nuclear manufacturing operations and reduces operations cost for the nuclear complex. There is not one other major project that so dramatically demonstrates responsible stewardship by the US government.

2|13.0 Most importantly, this project goes to the core of freedom and security for this country. In the absence of a viable nuclear manufacturing capability the US puts itself at risk as a free and secure nation. If this project is not carried forward the US will become vulnerable to those nations that do have such capability.

The UPF project has been thoroughly planned, researched, and critiqued. It is vital to the best interests of this nation and must go forward with the highest level of support.

Best Regards,
Ronald L. Shelton, PE
29 Riverside Dr.
Oak Ridge, TN 37830

1

Shults, Wilbur

Page 1 of 2

MD026

Coalition of Oak Ridge Retired Employees (CORRE)
P. O. Box 4266
Oak Ridge, Tennessee 37831-4266

December 17, 2009

Ms. Pam Gorman
Y-12 SWEIS Document Manager
Y-12 Site Office, NNSA
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, Tennessee 37830

Dear Ms. Gorman:

Resolution in Support of Proposed Uranium Processing Facility at Y-12

I submitted a statement supporting the proposed Uranium Processing Facility at Y-12, i.e., Alternative Four: the Capability-Sized UPF, during the public meeting at the New Hope Center on October 18, 2009. That statement was an expression of my support as an individual.

1|13.0 The attached formal resolution is an expression of similar support from the Board of Directors, hence the membership, of the Coalition of Oak Ridge Retired Employees. CORRE is comprised of approximately 12,000 former employees of Department of Energy facilities in Oak Ridge, Tennessee.

Please include this resolution in the appropriate document database.

Sincerely,

Wilbur D. Shults

Wilbur D. Shults, PhD
President

Information Copies:
Gerald G. Boyd, DOE-ORO
Ted Sherry, NNSA
Darrel Kohlhorst, B&W Y-12
Thom Mason, ORNL

Working for Fair and Equitable Retirement Benefits for Former Employees of K-25, Y-12, and ORNL, and Grandfathered Employees of Bechtel Jacobs and Wackenhut

Shults, Wilbur

Page 2 of 2

COALITION OF OAK RIDGE RETIRED EMPLOYEES
P.O. Box 4266
Oak Ridge, Tennessee 37831-4266

RESOLUTION supporting construction of a new uranium processing facility (UPF) at the Y-12 National Security Complex (NSC), Oak Ridge, TN.

WHEREAS, maintaining the security, safety, and reliability of the nation's nuclear stockpile is the responsibility of the National Nuclear Security Administration (NNSA); and

WHEREAS, the Y-12 National Security Complex in Oak Ridge, Tennessee, is a critical facility within the NNSA and the Department of Energy; and

WHEREAS, the chemical processing of uranium is central to the programmatic operations assigned to the NSC; and

WHEREAS, current facilities for chemical processing of uranium at the NSC are World War II vintage, expensive to operate and maintain, and inconsistent with modern equipment and methodology; and

WHEREAS, five separate alternatives for addressing the needs for appropriate chemical processing facilities at NSC have been developed, evaluated, and presented in public hearings; and

WHEREAS, the preferred alternative ("Alternative Four: The Capability-Sized Alternative") will provide the necessary capabilities at minimal cost, in modern facilities, and with optimized security and safety; and

WHEREAS, the Coalition of Oak Ridge Retired Employees (CORRE) is an organization comprised of approximately 12,000 retirees of DOE's Oak Ridge facilities, many of whom are intimately familiar with chemical operations at NSC; now, therefore:

BE IT RESOLVED BY THE BOARD OF DIRECTORS OF THE COALITION OF OAK RIDGE RETIRED EMPLOYEES that the membership of this organization does hereby express strong and sustained support for Alternative Four as the best option for providing chemical processing facilities (and hence capabilities) at the NSC, and we urge the NNSA and DOE to:

1|13.0 (cont)

(a) adopt the Capability-Sized Alternative as proposed in the draft Site-Wide Environmental Impact Statement presented in a public hearing on October 28, 2009; and

(b) construct a new Complex Command Center (CCC) as proposed in Alternatives 2–5 of the draft Site-Wide Environmental Impact Statement presented in public hearing on October 28, 2009.

APPROVED by the Board of Directors, December 5, 2009.

Wilbur D. Shults

Wilbur D. Shults, PhD
President

Shults, Wilbur

Page 1 of 1

OR2D09

1|13.0 My name is Wilbur D. Shults. I am a retiree from ORNL and currently the president of the Coalition of Oak Ridge Retired Employees, aka CORRE. I anticipate that CORRE will submit a written statement of support for locating the UPF at Y-12, but I speak now as a supporting individual.. For many years, I was Director of the Analytical Chemistry Division at ORNL. Most of the work of my division was located at X-10, but I had a Section of approximately 30 technical people stationed at Y-12. Accordingly, there was much interaction and cooperation between my people and the chemists at Y-12. They helped us at times and we helped them at times. Our missions were different, but our technical fields had much in common and that fact paid off for both parties many, many times.

1|13.0 (cont) There are many reasons for locating the UPF at Y-12 and those reasons will be iterated repeatedly during these hearings. The point I want to make is that there are terrific technical reasons for locating the UPF at Y-12 because it will be within easy collaborating distance of ORNL. It is always helpful to be able to go to another person who works in the same discipline, or a parallel discipline, for technical discussions and sometimes even for light experimentation. It is always helpful to have a wide array of instrumentation and expertise close at hand. There is a natural synergism that benefits both parties. The benefits accrue in the present tense when there are difficult problems to solve and they accrue in the future tense as science advances.

I strongly support the Capability-Sized UPF Alternative. I believe it offers the best option for the country, both now and in the decades ahead.

Submitted by Wilbur D. Shults, PhD in lieu of verbal input during the public hearing of Nov. 18, 2009.

Sizemore, Sara

WD067

[redacted]

From: Sara Sizemore [sara@southernsafety.com]
Sent: Wednesday, January 20, 2010 12:11 PM
To: DIV.Y12SWEIS.Comments
Subject: Support of UPF

To Whom It May Concern:

1|13.0 This is to place our support of the UPF at the Y-12 NNSA facility in Oak Ridge, Tennessee. After following the goals and desires of Y-12 over several decades, it is evident that they are on track to make significant reductions in their post-Cold War footprint while increasing efficiency and lean operations. It seems at great odds to hinder a program that has such great potential, such lengthy reviews and studies, and such a concrete plan to achieve this goal. In comparison, you have ETTP (formerly K-25) which is a huge problem as evidenced by multiple contractors being unable to perform the desired outcome due to poor planning, little insight, and no cohesive effort.

Thank you in advance for consideration of our comments and hope to see this site's goals realized within our lifetime.

Sincerely,

Sara Sizemore
President
Southern Safety Supply, LLC
www.southernsafety.com
865.673.0140
1.865.673.0145
Toll Free: 1.866.417.7963

"A democracy will continue to exist up until the time that voters discover they can vote themselves generous gifts from the public treasury. From that moment on, the majority always vote for the candidates who promise the most benefits from the public treasury, with the result that every democracy will finally collapse due to loose fiscal policy, which is always followed by a dictatorship." -- Alexander Tyler, University of Edinburgh, 1787

Smathers, Linda

WD106

[redacted]

From: Linda Smathers [lindasmathers@hotmail.com]
Sent: Friday, January 29, 2010 2:57 PM
To: DIV.Y12SWEIS.Comments
Subject: Prefer OREPA Alternative 6

1|9.A Pam Gorman, I would like to go on record urging that the OREPA alternative 6 be implemented at Oak Ridge. This country is drowning in debt and we certainly don't need to waste $3.5 billion on a new nuclear bomb facility in Oak Ridge. $100 million for alternative 6 is much more palatable especially when we don't need to add "life extended" warheads to our stockpile.

Thank you.

Linda Smathers
14 Trevor's Trail
Asheville, NC 28806
828-667-9439

Smick, Charles

Page 1 of 1

MD036

Draft Y-12 Site-wide
Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010.

1|5.0 I believe that alternative #2 - build a new Uranium Processing Facility and Complex Command Center. I have worked at the USEC Facility in Paducah, and expect the current facilities at Y-12 are in as bad a shape as worse, than the one in Paducah.

2|3.B From an economic, safety and environmental standpoint the new facility makes the best sense. From a National Security Stand-point, the new upgraded facility is critical for the welfare of the United States. It would also be a great benefit to the country, to build a

3|15.0 similar down-sized facility at the PGDP once the facility at Oak Ridge is complete

Charles J. Smick, CIH, CSP, OHST, CHST
Sr. Safety Engineer
MAJ, IN, ANG
USAR-Ret. Reserves

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:
http://www.Y12sweis.com

Smith, Michelle

Page 1 of 1

WD104

[redacted]

From: Michelle Smith [themichellesmith@gmail.com]
Sent: Friday, January 29, 2010 2:53 PM
To: DIV.Y12SWEIS.Comments
Subject: prefer the OREPA alternative 6

Dear Ms. Gorman,

1|9.A I strongly prefer OREPA alternative 6 which will cos far less money and will not include the actual making of nuclear bombs near my home in Asheville. I strongly oppose the making of nuclear bombs in any case and by the time nuclear bomb-making plan in Oakridge was actually complete it will be obsolete.

Thank you,
Michelle Smith
Asheville, NC

1

Smith, Robin

Page 1 of 1

OR1D08

ROBIN SMITH
CONGRESS

November 16, 2009

Ms. Pam Gorman,
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Dear Ms. Gorman,

1|13.0 Please accept this writing as documented support of the Uranium Processing Facility (UPF) proposed at the Y-12 National Security Complex. The missions of Y-12 continue to modernize and serve our nation's security and energy needs with efficiency and the highest level of security and integrity.

The proposed UPF, in tandem with the Uranium Storage Facility onsite at Y-12, will provide expertise and excellence that are both mandatory in pursuit of non-proliferation of nuclear weapons, converting weapons-grade uranium to a diluted fuel source and stand ready, at a moment's notice, to supply America's military with the critical enriched uranium for weapons. The National Security Complex of Y-12 stands alone as a superior site with a trained and superior workforce readied for this mission.

Among the alternatives considered, the draft Site-Wide Environmental Impact Statement (EIS) appears as the preferred option.

Once elected to serve as the U.S. Representative for the 3rd Congressional District as the successor to Congressman Zach Wamp, it will be my priority to support the imperative missions at the Y-12 Complex because of their very nature, the unquestionable devotion of Oak Ridge to these missions and our nation's need for such a facility.

I ask that you please include these statements of support in the official record of the EIS. I also encourage you to contact me directly with any pursuit of additional comments or questions.

With Sincerest Regards,

Robin Smith
3RD Congressional District Candidate

Paid for by Robin Smith for Tennessee
P.O. Box 23805, Chattanooga, Tennessee 37422
Robin@RobinForTennessee.com

Smith, Rodney

Page 1 of 1

WD008

[redacted]

From: Smith, Rodney Bruce (BSR) [smithrb@y12.doe.gov]
Sent: Monday, November 16, 2009 5:05 PM
To: DIV.Y12SWEIS.Comments
Subject: SWEIS Input

I would like to put in my opinion:

1|5.0 To do nothing but continue operations as we are is not realistic nor is it affordable. What we have is in dire shape and very inefficient That our operations personnel are able to perform their mission and do it safely is an indication of what heroes they are.

2|7.0 What make sense is the UPF options 2 or 4. We must be capable of replacing stockpile components in the way they were originally manufactured so that we can ensure they will perform as designed. We must maintain a credible stockpile in deliverable form.

3|13.0 Nations such as Iran will seek and develop nuclear weapons and only the threat of retaliation has any hope of countering their aims. We must be prepared to defend against an enemy who does not think the way we do, value what we value, and may feel it is their duty to start such a conflict and it is their hope to die trying.
It is to our own peril to do nothing.

1

Southecorvo, Robin

Page 1 of 1

WD066

[redacted]

From: Frank Southecorvo [fsorso@bellsouth.net]
Sent: Wednesday, January 13, 2010 10:01 AM
To: DIV.Y12SWEIS.Comments
Subject: Form posted from Windows Internet Explorer.

firstName=Robin
lastName=Southecorvo
organization=
email=fsorso@bellsouth.net
address1=20 Friendly Hollow
address2=
city=Asheville
state=NC
zip=28806
country=
subject=Draft Y-12 SWEIS
1|1.C comments=President Obama renewed the Start Tready to reduce warheads. This means we will have less weapons. He commented to zero in the future. We need the nonproliferation treaty. We do not need a new bomb plant at Oak ridge TN. It is dangerous,non productive and too expensive. Having a new plant will only
2|1.E encourage more nuclear weapons through out the world. If we,the USA, build more waeapons everyone will !!! The countrys we do not want to have nuclear weapon will definently get them !!! Please do not open a new bomb plant at Oakridge,TN.
Thank you
Robin Southecorvo

1

Speciale, Samuel

Page 1 of 1

WD105

[redacted]

From: Sam Speciale [sgspeciale@yahoo.com]
Sent: Friday, January 29, 2010 2:55 PM
To: DIV.Y12SWEIS.Comments
Subject: OREPA alternative 6

1|1.E I only recently was made aware of possible plans to build more nuclear materials processing facilities in nearby OAK RIDGE, Tennessee. At a time when our federal government is trying to reduce the global spread of
2|12.L nuclear weapons, such efforts would, at best, be problematic and deter real negotiations. Furthermore, nuclear waste disposal, such as from nuclear power plants continues to grow and remains without a viable solution.
3|9.A I support efforts such as the OREPA alternative 6(http://www.stopthebombs.org/news/orepa-statement-on-y12-draft).

Thank you for your consideration.
Samuel Speciale, PhD
14 Trevors Trail
Asheville, NC 28806

1

Stevenson, David

Page 1 of 1

WD083

[redacted]

From: David Stevenson [david@davidsguitar.com]
Sent: Wednesday, January 27, 2010 9:26 AM
To: DIV.Y12SWEIS.Comments
Subject: Orepa alternative 6 preferred

1|9.A Stating my preference for OREPA alternative 6.

David Stevenson
Mars Hill NC 28754

Sent from my iPhone

1

Stockton, Peter

Page 1 of 4

WD107

[redacted]

From: Ingrid Drake [idrake@pogo.org]
Sent: Friday, January 29, 2010 3:32 PM
To: DIV.Y12SWEIS.Comments
Subject: Pls confirm receipt of the attached
Attachments: POGO Y-12 Letter 1-29-10.pdf

Thanks!

--
Ingrid N. Drake
Investigator and Director of the Congressional Oversight Training Series (COTS)
Project On Government Oversight (POGO)
1100 G Street, NW, Suite 900
Washington, DC 20005-3806
Phone 202-347-1122
Fax 202-347-1116
Web http://www.pogo.org
pogoblog.typepad.com/
twitter.com/POGOBlog

Founded in 1981, the Project On Government Oversight (POGO) is an independent nonprofit that investigates and exposes corruption and other misconduct in order to achieve a more effective, accountable, open, and ethical federal government.

1

Stockton, Peter

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WD107

Project On Government Oversight
Exposing Corruption Exploring Solutions www.POGO.org

January 29, 2010

Ms. Pam Gorman
Y-12 SWEIS Document Manager
Y-12 Site Office
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Submitted via e-mail: Y12sweis.comments@tetratech.com

Re: POGO's Comments on the Site-Wide Environmental Impact Statement for the Y-12 National Security Complex

To Whom It May Concern:

The Project On Government Oversight (POGO) is an independent nonprofit that investigates and exposes corruption and other misconduct in order to achieve a more effective, accountable, open, and ethical federal government. POGO believes that this Y-12 Site-Wide Environmental Impact Statement (SWEIS) process is flawed and a bit presumptuous, because the National Nuclear Security Administration's (NNSA) decision to take action on the Uranium Processing Facility (UPF) comes before the 2010 Nuclear Posture Review is complete. That said, POGO did review the alternatives outlined in the Draft Y-12 SWEIS and found that they do not reflect the reality of the Administration's vision and plan for nuclear weapons. POGO is opposed to the five alternatives, and is proposing a sixth alternative, which will not only save taxpayers' money but will also improve the security of nuclear materials. 1|1.A 2|14.0

POGO's alternative requires that the NNSA design an aggressive plan for downblending the approximately 300 Metric Tons (MT) of highly enriched uranium (HEU) stored at Y-12. Currently, DOE is planning to store this HEU inventory at the newly constructed Highly Enriched Uranium Materials Facility (HEUMF). However, the material could instead be declared excess because it's not needed for naval reactor fuel—the Navy could have priority on HEU from dismantled canned subassemblies from the stream of weapons in the dismantlement queue to fuel its nuclear powered submarine fleet. 3|9.E

1100 G Street, NW
Suite 500
Washington, DC
20005-6806
Phone: 202-347-1122
Fax: 202-347-1316
www.POGO.org
pogo@pogo.org

Stockton, Peter

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WD107

Declaring Y-12's 300 MT of HEU as excess and downblending it has several benefits: it would eliminate the perceived need to construct the multi-billion dollar UPF; it would reduce the cost of storing un-needed weapons-grade material while simultaneously creating the revenue-generating low enriched uranium (LEU); and it would significantly reduce the security risk inherent in storing HEU. 3|9.E (cont)

Regarding the UPF, NNSA failed to build a strong case for the need for the facility in either the *Complex Transformation* and the UPF SWEIS. NNSA states the purpose for the proposed UPF as R&D and producing HEU secondaries for weapons. However, the specifics of what R&D entails is not clear, and since there are thousands of secondaries in storage, there is no established need to manufacture new ones. A recent report by the respected JASON group regarding the Lifetime Extension Program (LEP) states that "today's nuclear warheads could be extended for decades, with no anticipated loss in confidence," which also confirms that there is no need to manufacture additional secondaries. 4|3.B

But even if the UPF were needed for those functions, downblending Y-12's HEU would free up enough space at HEUMF to accommodate the limited R&D and manufacturing functions currently planned for the UPF. Combining functions into one facility is not unprecedented. For example, the PF-4 facility at Los Alamos National Lab does R&D and manufacturing, and stores tons of weapons-grade plutonium. Moving the functions planned for the UPF into HEUMF would eliminate the need to build the UPF, thus saving an estimated $3.5 billion in new construction costs, plus operations and security costs for a new facility. In addition, UPF will likely have soaring construction costs and overruns, as did the HEUMF, for which costs ballooned from $97 million to $549 million. The National Ignition Facility (NIF) project also experienced dramatically increased costs and delayed completion dates. The Department of Energy sold the NIF to Congress in the early 1990s with a reported cost estimate of $700 million and an original completion date of 2002, yet its most recent cost estimate is $5-6 billion with a completion date of 2010—more than 600 percent over budget and at least 8 years behind schedule. Thus, investment in UPF is not a wise decision and that those funds should be spent to facilitate downblending. 3|9.E (cont) 3|9.E(cont)

POGO's alternative not only saves money by eliminating construction costs, it will generate revenue by creating LEU. If Y-12's HEU was downblended into LEU, it would be worth an estimated $72 million per MT, totaling in excess of $18 billion.[1] Globally, LEU is increasingly in demand as fuel for nuclear power reactors, which provides 19 percent of U.S. electricity. 3|9.E (cont)

Perhaps most importantly, POGO's alternative provides the most security, as opposed to NNSA's plan to indefinitely store the dangerous and valuable HEU. Unlike HEU, LEU is not weapons-usable, and therefore does not pose serious security risks or require expensive security systems to guard it. The primary goal of nuclear terrorists is to get their hands on HEU. Using

[1] The $18 billion amount is determined by the formula that each MT of HEU would be worth over $72 million, as stated in: "Expanded and Accelerated HEU Downblending: Designing Options to Serve the Interests of all Parties," written by Harvard University's Matthew Bunn for the Institute of Nuclear Materials Management 49th Annual Meeting. http://www.nti.org/c_press/Bunn%20INMM%20July%202008%20logo.pdf. The price of LEU fluctuates with the market ranging from $7/lb. to $55/lb. http://www.moneyweb.co.za/mw/view/mw/en/page66?oid=241290&sn=Detail. These revenues would be combined with the savings of storing and securing HEU minus the costs associated with the process to determine the net value.

2

Stockton, Peter

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WD107

3|9.E (cont)

only approximately 100 pounds of HEU, terrorists could create an improvised nuclear device that has the potential for a blast as large as 10-kilotons—one that has the same yield as the nuclear bomb used on Hiroshima.[2] As Nobel Prize-winning physicist Luis Alvarez explained:

> With modern weapons-grade uranium, the background neutron rate is so low that terrorists, if they had such material, would have a good chance of setting off a high-yield explosion simply by dropping one half of the material onto the other half. Most people seem unaware that if separated U-235 [highly enriched uranium] is at hand, it's a trivial job to set off a nuclear explosion. ... Given a supply of U-235 ... even a high school kid could make a bomb in short order.[3]

Terrorists have less interest in LEU because reactor-grade LEU contains less than 20 percent U-235 and cannot sustain an explosive nuclear chain reaction.[4]

We appreciate the opportunity to submit these comments.

Sincerely,

Peter Stockton
Senior Investigator

Ingrid Drake
Investigator

[2] An Improvised Nuclear Device (IND) explosion is qualitatively different from a "dirty bomb," also known as a dispersal device: detonating plutonium or highly enriched uranium with an explosive would cause a major dispersion of highly radioactive materials. The explosion from the nuclear bomb dropped on Hiroshima was created using a "gun type" method (firing a piece of highly enriched uranium at another piece to create a chain reaction). Using the same theory, terrorists could create a crude IND by taking two pieces of HEU and slamming them together with conventional explosives, or by simply dropping one plate of HEU from a certain height onto another. See: Bunn, Matthew and John P. Holdren. "A Tutorial on Nuclear Weapons and Nuclear-Explosive Materials: Nuclear Weapons Design and Materials." *Securing the Bomb 2006*. Managing the Atom Project, Harvard University. September 6, 2006. http://www.nti.org/e_research/cnwm/overview/technical2.asp. This nearly happened accidentally at Y-12 several years ago. (The HEU was not dropped from a significant height, and the scientist was able to kick away the piece that was dropped before a reaction could take place.) According to Princeton University physicist Frank von Hippel, "a 100-pound mass of uranium dropped on a second 100-pound mass, from a height of about 6 feet, could produce a blast of 5 to10 kilotons." Wald, Matthew L. "Suicidal Nuclear Threat Is Seen at Weapon's Plants." *The New York Times*, January 23, 2002. By comparison, the blast from the Hiroshima bomb was 13 kilotons. It killed over 200,000 people. *WMD 411*. Center for Nonproliferation Studies at the Monterey Institute of International Studies, 2004. http://www.nti.org/f_wmd411/f1a4_1.html; and "The Destructive Power of Nuclear Weapons: Hiroshima and Nagasaki." Nuclear Terrorism Tutorial: Center for Nonproliferation Studies at the Monterey Institute of International Studies, 2005. Chapter 2. http://www.nti.org/h_learnmore/nuctutorial/chapter02_08.html.

[3] Alvarez, Luis W. *Alvarez: Adventures of a Physicist*. Basic Books: New York, 1987. p 125.

[4] POGO was one of the first groups to raise awareness about this possibility with the publication of its investigative report *U.S. Nuclear Weapons Complex: Security At Risk*, October 1, 2001. http://www.pogo.org/pogo-files/reports/nuclear-security-safety/security-at-risk/.

3

Stockwell, Jim

Page 1 of 1

MD013

Mr. Jim Stockwell
PO Box 307
Micaville, NC 28755

11.21.09

Dear Pam Gorman, Y-12 SWEIS Document Manager
Public comment.

I know there are a lot of inside language to define what it is the DOE/NNSA want to do at the Y-12 Complex: ~~Bomb~~ Nuclear Weapons manufacturing, reassembling, disassembling, modernization, modification plant.

We the people believe nuclear weapons are obsolete. And the Nuclear Powers of the World have all agreed to dismantle all their nuclear warheads until zero is the number in existance. Let them become extinct.

So the impact being concidered at the Oak Ridge NNSA facility should be to upgrade its current operations to standards protective of workers, public health, and safety as well as safe-guarding and protecting nuclear fissionable materials. And be part of the over-all national plan to reduce nuclear warheads to zero. 1|9.B 2|1.C

The rest of what is being concidered needs to be anulled to: no new bombs, no new triggers, no new LEP's, no new secondaries, no new pits, Only disassemblies, dismantles, dispositions, and secure and safe storage. 1|9.B (cont)

Thank you for taking my comments and I hope we can fulfill an agreement ~~to~~ Preciident Obama has made with the World.

In Peace, James E Stockwell

Swan-Dass, Yol

Page 1 of 1

WD085

[redacted]

From: Yol Swan-Dass [yol@sacred-jewelry.com]
Sent: Wednesday, January 27, 2010 10:32 AM
To: www.y12sweis.comments@tetratech.com; DIV.Y12SWEIS.Comments
Subject: I prefer the prefer the OREPA alternative 6

To Whom It May Concern,

I am writing to voice my concern about the idea to spend 3.5 billion dollars on a new nuclear bomb facility in Oak Ridge Tennessee, which is vasically our backyard.

1|3.A It is senseless and irresponsible to spend billions on a facility which, by the time it is completed in 2018, will no longer be needed.

Plus, the US stockpile of "life extended" warheads will exceed the maximum number allowed by the START treaty at that point.

2|12.H And 2,500 jobs would be lost in Oak Ridge with the new facility, since it would be largely automated.

3|9.A I strongly urge you to implement the OREPA Alternative 6 instead, which would cost 100 million and would NOT include the actual making of nuclear bombs in Oak Ridge.

Thank you for your attention to this important matter.

Sincerely,

Yol Swan-Dass
59 Terrace Dr.
Weaverville, NC 28787
--

1

Thompson, Betty Jo

Page 1 of 1

WD113

[redacted]

From: MorrThomps@aol.com
Sent: Friday, January 29, 2010 8:06 PM
To: DIV.Y12SWEIS.Comments
Subject: nuclear proposal

1|9.A I wish to register my preference for OREPA alternative 6 . We do need to be making new nuclear bombs. It absolutely senseless , wasteful and irresponsible. How can we insist on any other not making nuclear bombs and the USA even consider such a path. This is utter folly.

Betty Jo Thompson

1

Underwood, Mary Lou

Page 1 of 1

WD029

[redacted]

From: Underwood, Mary Lou (MU2) [underwoodml1@y12.doe.gov]
Sent: Wednesday, November 18, 2009 12:41 PM
To: DIV.Y12SWEIS.Comments
Subject: I am a citizen here in Oak Ridge and I am a supporter of the UPF Project here at Y-12

1|13.0 I am a citizen here in Oak Ridge and I am a supporter of the UPF Project here at Y-12.

Mary Lou Underwood
107 Creek View Court
Oak Ridge, TN 37830

1

Underwood, Scott

Page 1 of 1

WD025

[redacted]

From: Underwood Jr, R Scott (RUI) [underwoodrs@y12.doe.gov]
Sent: Wednesday, November 18, 2009 6:39 AM
To: DIV.Y12SWEIS.Comments
Subject: Support of Y-12 and UPF Project

1|13.0 I am a long-time resident of Oak Ridge, Tennessee and a long-time employee at the Y-12 Plant. I want to make it known that I am in support of the modernization of Y-12 and the construction of Uranium Processing Facility(UPF) and the other aspects of the modernization plan for the Site. Y-12 has played, and will continue to play a vital role in the defense of this great country. The surrounding area has been and will continue to be a strong supporter of Y-12 and the mission it serves. Y-12 (and the contractors that have operated it over the years) and the DOE/NNSA have been an integral part of this area for over 60 years and have made a positive impact in all aspect of this region. The NNSA will not find a any stronger support for this important mission (not only the weapons work, but all aspects of the work done at Y-12) than the communities of East Tennessee. I strongly support the UPF project and Y-12 and would whether I worked there or not.

R. Scott Underwood Jr.
107 Creek View Court
Oak Ridge, TN, 37830

1

Waddell, Tim

Page 1 of 1

WD032

[redacted]

From: Tim Waddell [twaddell@energysolutions.com]
Sent: Wednesday, November 18, 2009 3:07 PM
To: DIV.Y12SWEIS.Comments
Subject: Form posted from Microsoft Internet Explorer.

firstName=Tim
lastName=Waddell
organization=
email=elthunter@bellsouth.net
address1=110 Newport Drive
address2=
city=Oak Ridge
state=TN
zip=37830
country=
subject=Draft Y-12 SWEIS
1|13.0 comments=The idea that the world is moving in a direction that will make it free of nuclear weapons is a nice one. However, with nations such as Pakistan and India already having nuclear weapons, and others such as Iran and North Korea working to possess them, it is not realistic to believe that a nuclear free world will happen any time soon. The U.S. must maintain a nuclear deterrent for the foreseeable future, and facilities such as the UPF and CCC are required to carry out that mission safely and efficiently.

1

Walker, Hazen

Page 1 of 1

WD030

[redacted]

From: Robert Walker [hazenrw@verizon.net]
Sent: Wednesday, November 18, 2009 1:09 PM
To: DIV.Y12SWEIS.Comments
Subject: No to making more nuclear weapons

firstName=Hazen
lastName=Walker
organization=
email=hazenrw@verizon.net
address1=1306 Hillcrest Dr.
address2=
city=Blacksburg
state=VA
zip=24060
country=United States
subject=Draft Y-12 SWEIS
1|10.B comments=The last thing the US or the world needs is a factory to make nuclear weapons. The money would be better spent on helping people—the unemployed, the hungry, the sick—or on repairing the nation's infrastructure. Do not support a war economy but an economy of peace.
rod=Record of decision

1

Wamp, Zach

Page 1 of 1

APPROPRIATIONS COMMITTEE

SUBCOMMITTEES:

MILITARY CONSTRUCTION AND VETERANS' AFFAIRS
RANKING MEMBER

ENERGY AND WATER

OR1D09

ZACH WAMP
UNITED STATES CONGRESS
THIRD DISTRICT OF TENNESSEE

WASHINGTON OFFICE:
1436 LONGWORTH HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
(202) 225-3271 (202) 225-3494 Fax

DISTRICT OFFICES:
200 ADMINISTRATION ROAD, SUITE 100
P.O. BOX 2001
OAK RIDGE, TN 37830
(865) 576-1976 (865) 576-3221 Fax

FEDERAL COURTHOUSE, SUITE 126
900 GEORGIA AVENUE
CHATTANOOGA, TN 37402
(423) 756-2342 (423) 756-6643 Fax

November 17, 2009

The Honorable Thomas P. D'Agostino
Administrator, National Nuclear Security Administration
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0001

RE: Comments for Record - NNSA Public Hearing Oak Ridge, Tennessee
Y-12 National Security Complex Draft Site-Wide Environmental Impact Statement

Dear Administrator D'Agostino:

Thank you for an opportunity to comment on the National Nuclear Security Agency's analysis for current and future operations, facilities and activities at the Y-12 National Security Complex. Engaging the community and surrounding area of Oak Ridge, Tennessee, who proudly carry the banner of the Manhattan Project, is a fundamental step in making our nuclear weapons complex more responsive, secure and cost effective.

1|13.0 Construction of UPF is key to the viability and future success of the Y-12 National Security Complex. Since first proposed, I have actively supported modernization efforts, including the construction of the Highly Enriched Uranium Manufacturing Facility, (HEUMF) the Uranium Processing Facility (UPF), and the accelerated cleanup of the World War II and Cold War legacies. As the Uranium Center of Excellence, Y-12 leads the Department of Energy in the transformation of a more efficient, agile and state-of-the-art nuclear complex.

2|3.B The Uranium Processing Facility is essential to maintain our weapons reliability; fuel our nuclear Navy fleet; down blend enriched uranium in support of our nation's nonproliferation goals, and also accomplish a 90% reduction in Y-12's footprint while realizing substantial cost savings. I will continue to aggressively make this a primary focus in NNSA's plan to transform the complex to meet our national security needs for the next century.

Thank you again for the opportunity to communicate the importance of this project. It is an honor to work with the men and women of Y-12, the NNSA, and the Oak Ridge community.

Sincerely,

Zach Wamp
Member of Congress

http://www.house.gov/wamp/

Weston, Julie

Page 1 of 1

WD011

[redacted]

From: WestmorJW@aol.com
Sent: Tuesday, November 17, 2009 1:44 PM
To: DIV.Y12SWEIS.Comments
Subject: Draft Y-12 SWEIS

Dear Director:

1|9.C I understand that the United States is planning to invest two or three billion dollars to build more bombs. This is appalling! Our President Obama has declared a firm commitment to a world free of nuclear weapons. To build a plant to build more bombs is simply preposterous and indeed perilous in this day and age. IF we do this, other countries will follow suit and we'll be in a new arms race. Is anyone involved in this old enough to remember the arms race? the cold war? the threat of annihilation?

2|1.E

3|1.C Who's making policy in the United States these days? What we need in Oak Ridge is a realistic plan to maintain our nuclear arsenal in a safe and secure manner while the stockpile is reduced to zero. Building a new bomb plant now, under the guise of 'modernization,' corrupts the President's vision and negates all our efforts to constrain nuclear proliferation. That's not modernization, it's throwback—and it's clearly the wrong direction for the country.

4|14.0 Tell me, will the environmental impact statement include the danger of nuclear annihilation of the whole planet? Please stop this madness now.

Julie Weston
105 Hopi Drive
Hailey ID 83333

1

Wilburn, Bill

Page 1 of 1

OR2D07

Draft Y-12 Site-wide Environmental Impact Statement— U.S. Department of Energy National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010.

Submitted by
Bill Wilburn
108 Handel Ct
Oak Ridge, TN. 37830

To whom it may concern:

I support the preferred alternative (alternative 4) of a capability-sized Uranium processing facility (UPF) at the Y-12 national security complex.

The UPF will improve operational reliability because it will eliminate the need to rely on 60+ year old facilities and equipment that pose continuing issues with reliability.

1|7.0 It will improve the security posture for special nuclear material

It will improved health & safety protection for workers and the public

It will provide a significant return on investment by reducing operational costs by 33% and by reducing the size (and therefore cost) of the high security Area ~~but~~ by an average of $200 million per year.

Bill Wilburn

Please use other side if more space is needed

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:
http://www.Y12sweis.com

Wilkin, Frances

Page 1 of 1

MD066

January 2, 2010

Dear Pam Gorman:

1|1.c I received a brochure from a member of the Oak Ridge Environmental Peace Alliance stating that the National Nuclear Security Administration prepared a study of the new bomb plant they plan to build in Oak Ridge instead of preparing a Site Wide Environmental Impact Statement for Y12 as the law requires them to do. The presented plan indicates the Uranium Processing Facility will manufacture thermonuclear secondaries out of highly enriched uranium, lithium deuteride, beryllium, depleted uranium and a host of other materials.

With such plans, I feel as though NNSA is undermining President Obama's commitment to a world free of nuclear weapons and infringing upon our right to such a world.

How can NNSA claim consideration for our security by actions that not only violate the law requiring them to prepare a SWEIS but also undermine our credibility to preach abstinence to other nations?

Yours truly,

Frances Wilkin

Frances Wilkin
186 S. Wood Street
Wilmington, Ohio 45177

Williams, Bill & Betty

Page 1 of 2

Jan. 29. 2010 2:30PM TN BANK MAIN OFFICE No. 3831 P. 1

FD003

Draft Y-12 Site-wide
Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010.

1-29-10

Ms. Gorman

Please see attached comments

Thank you

Betty Williams

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:
http://www.Y12sweis.com

Williams, Bill & Betty

Page 2 of 2

Jan. 28. 2010 2:30PM TN BANK MAIN OFFICE No. 3831 P. 2

Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Jan. 28. 2010

The Y-12 Site-wide Environmental Impact Statement discusses at length how Y-12 will reduce in size as it moves toward its Modernization goals. However, very little is said about what resources will remain. The EIS process should include a thorough study of cultural resources important to the public.. The recent visit to Oak Ridge by the National Park Service reminded us all that Y-12 played a major role in history, that it holds a storehouse of history in its buildings and artifacts, and it is time to commit on which of these public resources will be preserved in accordance with the National Historic Preservation Act. 1|12.G

News articles on the Y-12 Complex have reported that over two hundred buildings have been demolished, and that hundreds more are slated for demolition. Many of these buildings are eligible for listing in the National Register of Historic Places. The SWEIS should be discussing how Y-12 will offset the loss of these historic structures. 1|12.G (cont)

I support a modern Y-12 Complex, and believe it can be achieved while preserving it's important history. Oak Ridge Historian Bill Wilcox has presented a plan that calls for Y-12 to save three buildings that are eligible for listing in the NRHP. They are Beta-3 and the calutrons, 9731, the original pilot plant, and 9706-2, original medical building, and best example of Y-12's Corps of Engineers style buildings. I support Mr. Wilcox's plan, and suggest it be made a part of Y-12's modernization plan. 1|12.G (cont)

Please address this issue in the SWEIS, and make a commitment regarding these cultural resources for which you are stewards.

Sincerely,

Bill and Betty Williams
451 East Drive
Oak Ridge, TN 37830

Wilson, Doug

Page 1 of 1

WD100

[redacted]

From: Doug Wilson [tdwilson@mwbavl.com]
Sent: Friday, January 29, 2010 1:33 PM
To: DIV.Y12SWEIS.Comments
Cc: 'heath.shuler@shuler.congressnewsletter.net'

1|9.A Dear Sir/Madam: I am against the nuclear bomb facility being considered for Oak Ridge, TN. I prefer the OREPA alternative 6. We do not need any more nuclear bombs and certainly do not need to spend $3.5 billion dollars on such a wasteful project. Sincerely, Doug Wilson

T. Douglas Wilson, Jr.
Attorney

McGuire, Wood & Bissette, P.A.
48 Patton Ave., Asheville, NC 28801
P.O. Box 3180, Asheville, NC 28802
Office: 828-254-8800
Fax: 828-252-2438

tdwilson@mwbavl.com
www.mwbavl.com

Please consider the environment before printing this email.

1

Wilson, Rickey & Yulonda

Page 1 of 1

OR1D03

Draft Y-12 Site-wide
Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

NNSA National Nuclear Security Administration

Written Comment Form

Must be received on or before January 29, 2010.

1|13.0 I believe the Y-12 COMPLEX IS THE BEST CHOICE FOR THE NEW UPF. Y-12 ALWAYS EMPHASIZES SAFETY AS THE NUMBER 1 PRIORITY. THE

2|1.E UPF NEEDS TO BE BUILT SO WE CAN CONTINUE TO DECREASE OUR ARSENAL WHILE SUPPLYING MUCH NEEDED MATERIAL FOR MEDICAL, ENERGY, Other Needs GLOBALLY.

1|13.0 (cont) Y-12 IS AN ESTABLISHED ENTITY THAT HAS THE ABILITY WITH THE MANPOWER TO PERFORM THE WORK IN A SAFE COST EFFECTIVE MANNER. WE HOPE TO CONTINUE TO SUPPORT OUR COUNTRY IN PEACE AS WE HAVE IN TIMES OF WAR, WE WANT TO DO THE WORK AND WE CAN DO THE WORK. THANK YOU!

Rickey & YULONDA WILSON
401 SCANDLYN HOLLOW RD
Oliver SPRINGS TN 37840

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis.comments@tetratech.com

You may also submit comments through the project website which can be found at:
http://www.Y12sweis.com

Wismer, Amber

Page 1 of 1

WD093

[redacted]

From: Amber [findamber@verizon.net]
Sent: Thursday, January 28, 2010 12:26 PM
To: DIV.Y12SWEIS.Comments
Subject: orepa alt 6

I would like to express my deep concern regarding the proposed nuclear Oak Ridge facility in TN. As a neigbor of TN I am definetly opposed to this idea. As a country we have so many important things to spend money on. Please consider the following information...

1|9.A • I prefer the OREPA (Oak Ridge Environmental Peace Alliance) alternative 6, which would cost 100 million and would not include the actual making of nuclear bombs in Oak Ridge

2|3.A • It is senseless and irresponsible to spend billions on a facility which, by the time it is completed in 2018, will no longer be needed because the US stockpile of "life extended" warheads will exceed the number allowed by the START treaty at that point.

3|12.H • 2,500 jobs would be lost in Oak Ridge with the new facility, since it would be largely automated.

Thank you for your time
Amber Wismer

1

Wurgel, Marge

Page 1 of 1

WD023

[redacted]

From: Marge Wurgel [margewur@cox.net]
Sent: Tuesday, November 17, 2009 11:12 PM
To: DIV.Y12SWEIS.Comments
Subject: y12swies

1|14.0 Please drop plans to build the weapons complex in Oak Ridge, TN. It will unleash a new upward spiral in the arms race on an already dangerous world. We need to learn to communicate with one another, not make more weapons. Thank you.

1

Yager, Ken

Page 1 of 1

MD068

KEN YAGER
STATE SENATOR
TENNESSEE SENATORIAL DISTRICT 12
CAMPBELL, FENTRESS, MORGAN, RHEA,
ROANE AND SCOTT COUNTIES

Senate Chamber
State of Tennessee
NASHVILLE

LEGISLATIVE OFFICE
10A LEGISLATIVE PLAZA
NASHVILLE, TENNESSEE 37243-0212
TELEPHONE: 615.741.1649
TN (TOLL-FREE): 1.800.449.8366, Ext. 11649
E-MAIL: sen.ken.yager@capitol.tn.gov

January 27, 2010

Ms. Pam Gorman
Y-12 SWEIS Document Manager
Y-12 Site Office
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

RE: Draft Site-Wide Environmental Impact Statement (SWEIS) for the Oak Ridge Y-12 National Security Complex

Dear Ms. Gorman:

1|13.0 I understand that the National Nuclear Security Administration (NNSA) has offered a Site-Wide Environmental Impact Statement (SWEIS) for the Oak Ridge National Security Complex (Y-12). Please accept and enter this letter of support into the record.

2|7.0 It is my understanding that five alternatives are covered in the SWEIS for the operation of current and future operations at Y-12. I support the preferred alternative which is the "capability-sized UPF."

3|13.0 The Oak Ridge community has always been a strong supporter of the uranium processing and nuclear related missions of the Oak Ridge complex. Y-12's continued role in manufacturing and disassembling nuclear warhead components should be conducted in modernized facilities with cost-effective and safety-focused processes. The preferred option of a new UPF achieves this objective.

I support the preferred option, because it is in the best interest of national security, worker and community safety, and economic impact on the entire Oak Ridge region.

Yours truly,

Ken Yager
State Senator

Zonar, James

Page 1 of 1

WD006

[redacted]

From: Zonar, James P (ZOC) [zonarjp@y12.doe.gov]
Sent: Thursday, November 12, 2009 3:24 PM
To: DIV.Y12SWEIS.Comments
Subject: Comment

1|5.0 I will be out of town on the days of the meetings, however I would like to offer my support for the approval of alternative 2. This alternative offers the best value and safety for the country and the community. No one knows where the world is heading with respect to nuclear arsenals, however, we must be poised to respond if necessary. We will not be able to respond if we remain in the existing facilities. Alternative 2 will also provide the community and nation with the best safety and security option. Once all special materials are put up in UPF and HEUMF, the materials will be safe for generations.
Thanks for accepting my comment.
Jim Zonar
1104 Winterberry Lane
Knoxville, Tn 37932

1

Multiple Signatory Letter 1
Page 1 of 3

WD057

[redacted]

From: Gorman, Pamela (P1G) [gormanpl@yso.doe.gov]
Sent: Tuesday, December 22, 2009 7:35 AM
To: Rose, Jay; Buenaflor, Delight
Cc: Boltz, Jackie
Subject: FW: Y12 SWEIS Comment Period Extension Request

Importance: High

[redacted]

From: Nickolas Roth [mailto:nroth@ananuclear.org]
Sent: Monday, December 21, 2009 5:53 PM
To: Gorman, Pamela (P1G); Mary.martin@nnsa.doe.gov; casey.ruberg@nnsa.doe.gov
Subject: Y12 SWEIS Comment Period Extension Request

Dear Administrator D'agostino:

1|2.B We write to request that the public comment period for the Draft Y12 Site Wide Environmental Impact Statement (SWEIS) be extended to the end of February. Although the current comment period has already been extended through January 29, 2010, it still does not provide adequate time for informed public comment.

2|1.A In particular, the Obama administration is preparing to release its Nuclear Posture Review (NPR) on February 1. The NPR is intended to provide a comprehensive, coherent policy direction for U.S. nuclear policy, including the number and types of nuclear weapons in the stockpile and the role played by the nuclear weapons complex. Obviously, this will significantly impact the size, mission, and necessity of certain facilities analyzed in the Draft Y12 SWEIS.

It is worth noting that the lack of just such a coherent policy direction generated the Congressional opposition to many of the National Nuclear Security Agency's recent plans for the arsenal and the complex. Incorporating time to include consideration of the outcome of the NPR in the Draft Y12 SWEIS comment period may increase support for the latter's goals.

1|2.B (cont) Also, the public comment period runs through numerous holidays including Thanksgiving, Christmas, Channukah, Kwanzaa, and New Year's. As organizations that have participated in numerous Environmental Impact Statements processes and have, for decades, been engaging nuclear weapons issues, we believe a comment period spanning several holidays is inadequate to allow a thorough analysis of the document, review of the supporting materials and preparation of comprehensive comments. The National Environmental Policy Act recognizes the value added by public participation is significant. Public outreach, education, and generation of input in a responsible and comprehensive manner require more time than now allocated.

For these reasons, we formally request an extension to the Y12 SWEIS public comment period until the end of February. We also ask that this letter be made part of the Environmental Impact Statement record. Thank you for your consideration of this important public issue.

If you have any questions concerning this request, please direct them to Nickolas Roth at nroth@ananuclear.org on our behalf. Thank you for your consideration of our request; we look forward to hearing of your response at

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Multiple Signatory Letter 1
Page 2 of 3

WD057

the earliest possible time.

Signatures

Susan Gordon
Director
Alliance for Nuclear Accountability

Leonor Tomero, JD MA
Director of Nuclear Non-Proliferation
Center for Arms Control and Non-Proliferation / Council for a Livable World

David Culp
Legislative Representative
Friends Committee on National Legislation (Quakers)

Christopher Paine
Director, Nuclear Program
Natural Resources Defense Council

Jon Rainwater
Executive Director
Peace Action West

Peter Wilk
Executive Director
Physicians for Social Responsibility

Danielle Brian
Executive Director
Project On Government Oversight

Stephen Young
Senior Analyst and Washington Representative
Union of Concerned Scientists

Local Organizations

Mary Davis
Director
EcoPerspectives, a project of Earth Island Institute

Ann Suellentrop M.S.R.N.
KC Plant Project Coordinator
Kansas City, Missouri

Tom Clements
Southeastern Nuclear Campaign Coordinator
Friends of the Earth
Columbia, SC

2

Multiple Signatory Letter 1

Page 3 of 3

WD057

Joni Arends
Executive Director
Concerned Citizens for Nuclear Safety
New Mexico

Alice Slater
Nuclear Age Peace Foundation
New York

Joni Arends
Executive Director
Concerned Citizens for Nuclear Safety
New Mexico

Jay Coghlan
Executive Director
Nuclear Watch New Mexico

Lisa Crawford
President
FRESH
Ohio

Mavis Belisle
Director
JustPeace
Texas

Ralph Hutchison
Coordinator
Oak Ridge Environmental Peace Alliance
Tennessee

3

Multiple Signatory Letter 2

Page 1 of 2

MD065

NIPPONZAN MYOHOJI

日 本 山 妙 法 寺

The Most Venerable Nichidatsu Fujii, Founder and Preceptor

January 3, 2010

Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike
Suite A500
Oak Ridge, TN 37830

Dear Ms. Gorman,

1|14.0 Please include our comments for consideration of the final Y-12 SWEIS.

To the Dept. of Energy and the National Nuclear Security Administration:

Having reviewed a summary of the Draft Y12 Site Wide Environmental Impact Statement, we wish to state our unequivocal opposition to all alternatives suggested by the NNSA for the Y-12 nuclear weapons facility and suggest an alternative more in keeping with the spirit of the Nuclear Non-Proliferation Treaty and with the words of the President of the United States.

2|9.c "It's naive for us to think that we can grow our nuclear stockpiles, the Russians continue to grow their nuclear stockpiles, and our allies grow their nuclear stockpiles, and that in that environment we're going to be able to pressure countries like Iran and North Korea not to pursue nuclear weapons themselves." These words of President Barack Obama would be made hollow and meaningless should any of the NNSA's alternatives become policy. We are at a tipping point in history where nations of the world need to make a collective decision: either everyone is going to have nuclear weapons or no one will have them. If the United States fails to assert political and moral leadership towards global nuclear disarmament and instead pursues expanded nuclear weapons production as envisioned by the Draft SWEIS, then convincing other nations to forgo these weapons will be an exercise in futility since leadership requires actions, not empty words. As a nation, the US must take concrete steps towards disarmament, as suggested by President Obama, in order for others to trust and follow.

3|1.e As you know, Y-12 produces thermonuclear secondaries for every nuclear bomb in the US arsenal. The NNSA prefers an option that would enable Y-12, in an upgraded facility, to produce between 50-80 secondaries a year. But continued production will indicate to other countries that despite the words of a president, there is no shift in US policy. The end result will be global proliferation. What needs to happen instead is for Y-12 to focus on the 12-15 year backlog of secondaries and subassemblies that are waiting to be dismantled. Only then will the US win the trust of other countries and will steps toward disarmament become possible.

4|10.b The price tag for the proposed alternatives ranges from $3 billion to $3.5 billion. It is irresponsible to spend billions on a bomb plant which, by the time it is completed, will no longer be

NIPPONZAN MYOHOJI — Atlanta Dojo: Buddhist Religious Order
1127 Glenwood Ave. , SE, Atlanta, GA. 30316, USA (404) 627-8948

Multiple Signatory Letter 2

Page 2 of 2

needed. During the Cold War, a rational (however erroneous) argument could be made that a large stockpile was necessary to counterbalance the threat of nuclear war from the Soviet Union. No such argument can be made today. Instead, nuclear weapons production is being driven by the private corporations that profit from manufacture of these weapon relics of the Cold War era. But satisfying the greed of these corporations is bad policy economically and politically. It is time to fashion a policy that truly fits the needs of our time.

5|9.a We agree with the proposal put forward by the Oak Ridge Environmental Peace Alliance which calls for an upgraded and down-sized Y-12 facility that provides passive curatorship of the current stockpile to assure safety and security. An annual throughput of 5 secondaries a year or less is sufficient to provide assurances of the safety, security and reliability of the stockpile as it awaits eventual dismantlement. A new dismantlement facility, with designed-in safeguards and transparency, should be built to accommodate the increased throughput of retired warhead secondaries and cases; the new facility should be sized to accommodate a throughput of the current backlog in 5-7 years and dismantlement of the entire US arsenal in 35-40 years.

Any policy or program at Y-12 that does not include eventual disarmament is irresponsible. The only conceivable motive for building a facility as recommended by the NNSA is to maintain an enduring nuclear arsenal and pursue production of new nuclear weapons. Every nuclear-capable state will take its cue should this proposal be accepted and pursue its own weapons production. It is time, it is crucial, it is in the interest of all humanity that we stop this madness and find a path that offers true security and peace for now and for future generations.

Sincerely,

Brother Gyoshu Utsumi
Sister Denise Laffan
Nipponzan Myohoji – Atlanta Dojo
1127 Glenwood Ave., SE
Atlanta, GA 30316

cc: U.S. President Barack Obama
U.S. Senator Saxby Chambliss
U.S. Senator Johnny Isakson
U.S. Representative John Lewis
The Oak Ridger
Oak Ridge Environmental Peace Alliance

Multiple Signatory Letter 3

Page 1 of 2

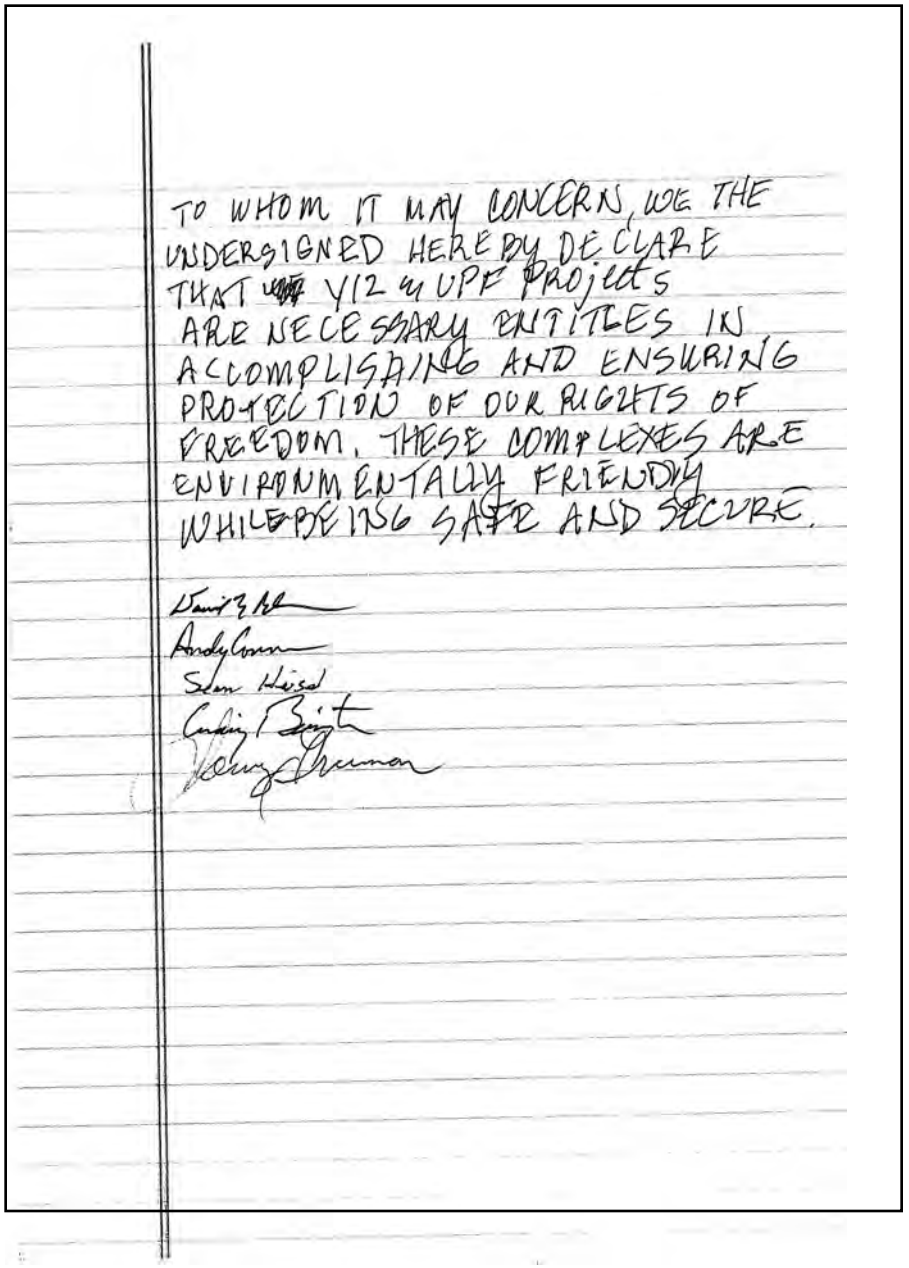
OR2D08

1|13.0 TO WHOM IT MAY CONCERN, WE THE UNDERSIGNED HEREBY DECLARE THAT THE Y 12 + UPF PROJECTS ARE NECESSARY ENTITIES IN ACCOMPLISHING AND ENSURING PROTECTION OF OUR RIGHTS OF FREEDOM. THESE COMPLEXES ARE ENVIRONMENTALLY FRIENDLY WHILE BEING SAFE AND SECURE.

Lynn Chapman
Ann Shih
James Miler
(WGH)
Randy McClan[illegible]
M.E. Ngu[illegible]
Wade Sims
Terry Wells

Multiple Signatory Letter 3

Page 2 of 2



TO WHOM IT MAY CONCERN, WE THE UNDERSIGNED HEREBY DECLARE THAT Y12 & UPF PROJECTS ARE NECESSARY ENTITLES IN ACCOMPLISHING AND ENSURING PROTECTION OF OUR RIGHTS OF FREEDOM. THESE COMPLEXES ARE ENVIRONMENTALLY FRIENDLY WHILE BEING SAFE AND SECURE.

David [illegible]
Andy Conn
Sam Heisel
Cindy Bright
John Thurman

Multiple Signatory Letter 4

Page 1 of 5

WD114

[redacted]

From: Ralph Hutchison [orep@earthlink.net]
Sent: Friday, January 29, 2010 8:25 PM
To: DIV.Y12SWEIS.Comments
Subject: Y12 SWEIS comment letter
Attachments: final SWEIS letter.pdf

Attached please find a letter commenting on the Y12SWEIS in pdf format.

Problems accessing this file should be addressed to Ralph Hutchison, orep@earthlink.net

1

Multiple Signatory Letter 4
Page 2 of 5

Ms. Pam Gorman
Y12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Via e-mail 29 January 2010

We are writing to comment on the Draft Y12 Site Wide Environmental Impact Statement (SWEIS). This letter is not a detailed analysis of the Draft, but instead highlights several significant issues that the SWEIS fails to adequately address.

1|1.E.1 1. The Draft Y12 SWEIS fails to address the impact of construction of the proposed Uranium Processing Facility on US efforts to constrain the proliferation of nuclear weapons and nuclear weapons capability around the world. The Department of Energy's 1996 Programmatic Environmental Impact Statement for Stockpile Stewardship and Management, its first post-Cold War public consideration of reconfiguring its nuclear weapons complex (the need for which had to be enforced by a citizen litigation), concluded that the Stockpile Stewardship program is "fully consistent with the NPT."

In the fourteen years since that self-absolving conclusion, the landscape of nuclear nonproliferation discussions has changed radically. Recognition of these changes has led former diplomatic, military and arms control experts to call for US leadership in the effort to rid the world of all nuclear weapons, a call echoed in the commitment of President Barack Obama. The world in 2010 is profoundly different than the world of 1996—North Korea has joined the ranks of nuclear weapons states; Iran is believed to be developing a nuclear capability; the United States invaded Iraq on the mere suspicion of possession of nuclear weapons of mass destruction. The attacks of September 11, 2001 demonstrated the capacity and determination of non-state actors to commit acts of terror against civilian populations, raising concerns about potential nuclear attacks. Non-weapons states at the Nonproliferation Treaty Review Conferences in 2000 and 2005 called for weapons states to deliver on their Article 6 commitment to pursue disarmament. The fundamental elements of any analysis of nonproliferation impacts have changed dramatically, rendering an analysis performed in 1996 obsolete on its face.

2|7.B 2. Four of the five alternatives determined to by NNSA to be "reasonable" would maintain a capability to produce at least 80 warheads/year, consistent with plans to build a new plutonium pit manufacturing facility at Los Alamos with a 50/80 warhead per year capacity. Expanding US warhead manufacturing capacity at this time is an unnecessarily provocative act. The actual manufacturing capacity required to maintain the current arsenal in a safe, secure and reliable status is represented by the fifth alternative—5 warheads per year—also determined to be "reasonable" by NNSA. Given the recent finding by expert independent scientists known as the JASON that the existing US stockpile is safe, secure and reliable and can be confidently and indefinitely maintained, no $3.5 billion investment in the UPF for new warhead production capacity is warranted.

3|8.A

4|1.A.1 Nor is it needed. The existing US stockpile contains 1,786 warheads that have been produced or refurbished since 1988; each of these has a shelf life of at least 30 years. Ongoing modification/upgrades of the W76 warhead involving Y12 and the Kansas City and Pantex Plants will bring the total number of recent-vintage warheads to 2,986. At the same time, the ceiling for operationally deployed strategic nuclear weapons set by the START Treaty is 1,675. Some time in 2012—six years before the UPF could be completed—the number of warheads in the US stockpile will exceed the number of warheads allowable under the new START Treaty.

5|3.C Relevant to the UPF's mission as currently planned, the NNSA assumes that every existing nuclear weapon refurbished during a Life Extension Program needs to have a newly rebuilt secondary. Since that underpins the fundamental rationale for the UPF, the final Y12 SWEIS should explain why that is necessary or not. Additionally, the Bush Administration planned wide-scale Life Extension Programs, with ~2,000 W76 warheads (out of an estimated existing 3,200 warheads) slated for refurbishment. It remains to be seen whether the pending Nuclear

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Posture Review will require anywhere near that scale. In any event, the UPF, if it is to proceed at all, should have its mission redirected toward the dismantlement of secondaries rather than their rebuilding, and the downblending of an estimated 350-400 metric tons of weapons-grade highly enriched uranium at Y-12. The final Y12 SWEIS should examine that re-missioning, including the added possibility that a separate UPF is not needed at all, but that needed dismantling and downblending could occur within the newly built $600 million-plus HEU Materials Facility.

6|9.D

3. The Y12 SWEIS does not address the dismantlement mission of Y12 in any detail; dismantlement operations are treated as an adjunct to production operations. By 2016, however, dismantlement and disposal of warheads materials should and likely will be the central mission of Y12. Existing dismantlement facilities are already taxed beyond capacity; there is a backlog of retired warheads awaiting dismantlement of at least 10 years. This backlog is destined to grow as more than 500 additional warheads are retired as Strategic Offense Reduction Treaty ("Moscow Treaty") and START stockpile levels are attained.

The Y12 SWEIS should fully develop and analyze the alternative proposed by the Oak Ridge Environmental Peace Alliance and others—construction of a new, single-purpose Dedicated Dismantlement Facility in Oak Ridge to meet the growing requirement for dismantlement capacity. Residual production mission requirements, which can be expected to diminish significantly, can be met by consolidating and down-sizing current operations to a 5 warhead/year capacity in an existing facility. Already scheduled upgrades (currently proposed as interim steps during a UPF construction phase) should be made semi-permanent, extending the life of Y12's production operations by 20-25 years.

7|9.A

The Dedicated Dismantlement Facility alternative, combined with the consolidated, down-sized upgrade-in-place alternative, has several virtues that recommend it above other alternatives. It permits the United States to maintain its existing stockpile without undercutting US nonproliferation efforts. It maximizes jobs in Oak Ridge. It saves two billion taxpayer dollars in capital expenses. It addresses a growing critical need for expanded Dismantlement capacity. It demonstrates leadership consistent with the US commitment to disarmament as articulated by President Obama. It reduces the high-security footprint of Y12 by at least sixty percent, permitting accelerated demolition of old buildings and reducing security costs. It can incorporate new, state-of-the-art dismantlement technologies and more rapidly retire the backlog that currently plagues Y12.

8|12.M.1 9|12.E 10|12.J.3 12|2.G.2 4. It is also important to note that the current Draft Y12 SWEIS does not, in fact, provide a site-wide analysis of environmental impacts of Y12 operations. There is inadequate discussion of seismic concerns surrounding current and future buildings; there is inadequate assessment of potential impacts from releases of materials and compounds used at Y12 in manufacturing and other processes; there are no realistic cost projections that would enable a reliable socio-economic impact analysis for any alternative. Instead, the Y12 SWEIS has been hijacked to provide National Environmental Policy Act documentation leading to official sanctioning for the UPF. 11|12.H

13|2.F 14|9.B In order to complete a credible Final SWEIS for the Y12 Nuclear Weapons Complex, the NNSA must address these concerns and incorporate appropriate responses into the Final SWEIS, including a rigorous and thorough analysis of the Dedicated Dismantlement Facility alternative.

15|1.A 5. In its May 2009 report the Bipartisan Congressional Commission on the Strategic Posture of the United States suggested delaying a decision on the UPF in order to "tailor the plan to new arms control agreements and their implications for future long-term requirements." NNSA instead chose to push the Y12 SWEIS forward, and worked to secure funding in the FY 2010 budget for detailed design of the UPF ($94,000,000 would permit 90% of the design to be completed in 2010 according to one member of the design team.) In January 2010, the Alliance for Nuclear Accountability requested an extension of the public comment period for the Y12 SWEIS because common sense and fiscal responsibility suggest that NNSA would be wise to pause and await the release of the pending Nuclear Posture Review before moving forward with any decision. We strongly believe that NNSA seriously erred in not granting that request. NNSA can not credibly mount an argument of urgency given the four year delay between the Notice of Intent for the Y12

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Page 4 of 5

SWEIS and the release of the Draft SWEIS. NNSA can and should wait until after the expected release of the new Nuclear Posture Review so that the need for the UPF can be more fully and soberly assessed.

For the above reasons, we find the draft Y12 SWEIS to be deficient in substance (both by commission and omission) and timing. We urge NNSA in the strongest possible terms to rectify these gross deficiencies in the final Y12 SWEIS, and to fully respond to our concerns.

Sincerely,

Jay Coghlan, Executive Director
Nuclear Watch New Mexico
Santa Fe, NM

Tom Clements
Southeastern Nuclear Campaign Coordinator
Friends of the Earth
Columbia, SC

Lisa Crawford, President
Fernald Residents for Environmental Safety & Health, Inc.
Harrison, OH

Alice Slater
Nuclear Age Peace Foundation, NY
New York, NY

Glenn Carroll
Coordinator
Nuclear Watch South
Atlanta, GA

Joni Arends, Executive Director
Concerned Citizens for Nuclear Safety
Santa Fe, New Mexico

Susan Gordon, Director
Alliance for Nuclear Accountability
Santa Fe, NM

Jon Rainwater, Executive Director
Peace Action West
Oakland, CA

Mavis Belisle
JustPeace
Amarillo, TX

Judith Mohling, Coordinator
Nuclear Nexus Program
Rocky Mountain Peace and Justice Center
Boulder, CO

Mary Davis
EcoPerspectives
a project of Earth Island Institute
Lexington, KY

Multiple Signatory Letter 4
Page 5 of 5

Don Hancock
Southwest Research and Information Center
Albuquerque, NM

CD001

Page 1 of 1

Dear Ms. Gorman: CD001 Date: 1-21-10

Thank you for being willing to read and listen to U.S. citizen's comments from all perspectives on the draft SWEIS for the Y-12 National Security Complex, by January 29, 2010.

1|14.0 2|3.A 3|1.C I oppose the plan to continue to build a new Uranium Processing Facility at Y12, as nuclear weapons are immoral, profoundly dangerous, illegal, too expensive and unnecessary. We need to truly abide by the Non-Proliferation Treaty, by dismantling nuclear weapons, keeping nuclear waste secure and not build new nuclear weapons.

4|9.A Though others have written letters to you explaining these reasons in greater depth, I sign this card so you know I too support the "Alternative 6" as proposed by the Oak Ridge Environmental Peace Alliance.

As Jesus Christ taught us in the Beatitudes, "Blessed are the Peacemakers for they shall be called the children of God."

Thank you,
Edward Sayers

CD002

Page 1 of 1

CD002

From: Robert G. Ward [robert.ward@bullrun-metal.com]
Sent: Saturday, January 23, 2010 8:01 AM
To: DIV.Y12SWEIS.Comments
Subject: Letter of Support "Alternative 4" SWEIS

Ms. Pam Gorman
Y-12 SWEIS Document Manager
Oak Ridge, TN 37830

Ms. Gorman:

1|13.0 I would like to go on record as supporting Alternative 4, Capability-Sized UPF Alternative to construct and operate a new UPF at the Y-12 National Security Complex that would have a reduced capacity while maintaining all enriched uranium processing capabilities.

2|12.P In addition, I support the construction of an emergency management Complex Command Centre . These two key components of modernization of Y-12 are essential to the future of the site. Finally, I believe that the Integrated Facilities Disposition Project needs to be more fully incorporated into the final SWEIS and the subsequent Record of Decision.

Sincerely,

Bull Run Metal Fabricators and Engineers
Robert G. Ward
125 East Centre Stage Business Park,
Clinton, TN. 37716 USA
Telephone; +1 865.457.7377
Toll Free [USA]; 888.853.6146
Facsimile; +1 865.457.7374

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CD003

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CD003

Pam Gorman, Y-12 SWEIS Document Manager
Y-12 Site Office
800 Oak Ridge Turnpike
Suite A-500
Oak Ridge, TN 37830

Re New U.S. Nuclear Weapons

Dear Ms. Gorman:

While President Obama has called for abolition of nuclear weapons and initiatives to be taken by nuclear weapons countries and the final review of the nuclear Non Proliferation Treaty will convene in May 2010, there are other voices and actions that undermine these goals and processes.

The US. Department of Energy announced plans for a new nuclear weapons bomb plant in Oak Ridge, TN that will cost 3.5 billion dollars. It will be a full-scale nuclear weapons production facility capable of producing 50-80 secondaries a year. The "secondary" is the thermonuclear part of the nuclear weapon which ignites the massive thermonuclear fusion reaction in the bomb. The Y-12 National Security complex has produced the secondary for every nuclear weapon in the U.S. arsenal.

1|14.0 We can no longer tolerate further production of nuclear weapons. They are not simply bigger bombs, are not useable, and are the means of ending all human and animal life on the planet. New nuclear weapons and new nuclear weapons

2|9.A facilities should not be built. Rather, I support the Oak Ridge Environmental andf Peace Alliance's (OREPA) Alternative #6, which advocates revamping the Y-12 facility to function primarily in *dismantling* nuclear weapons in

3|1.B negotiated verifiable steps with other nuclear weapons countries. Furthermore, our nuclear weapons policy should unequivocally renounce first strike use and abandon implicit threats of use against non-nuclear countries. We should

4|1.C end all actions that drive non-nuclear countries to seek nuclear weapons and begin finally to implement our obligations---long ignored---under the Nuclear Non Proliferation Treaty.

Sincerely,

Eleanor Rooney, Ph.D.
1300 E. Lafayette, #2102
Detroit MI 48207

CD004

Page 1 of 2

CD004

Vic and Gail Macks
20318 Edmunton
St. Clair Shores, MI 48080-3748
586 779-1782
vicmacks3@gmail.com
November 9,1009

Pam Gorman, Y-12 SWEIS Document Manager
Y-12 Site Office
800 Oak Ridge Turnpike
Suite A-500
Oak Ridge, TN 37830

Re New U.S. Nuclear Weapons

Dear Ms. Gorman:

While President Obama has called for abolition of nuclear weapons and initiatives to be taken by nuclear weapons countries and the final review of the nuclear Non Proliferation Treaty will convene in May 2010, there are other voices and actions that undermine these goals and processes.

The US. Department of Energy announced plans for a new nuclear weapons bomb plant in Oak Ridge, TN that will cost 3.5 billion dollars. It will be a full-scale nuclear weapons production facility capable of producing 50-80 secondaries a year. The "secondary" is the thermonuclear part of the nuclear weapon. Warheads in the U.S. arsenal are triggered by a relatively small fission bomb, the primary, which in turn ignites the massive thermonuclear fusion reaction in the secondary. The Y-12 National Security complex has produced the secondary for every nuclear weapon in the U.S. arsenal.

" At the Y-12 plant....the work performed on secondaries....called Life Extension....is not merely maintaining the U.S. arsenal in its current state, but....making substantive changes to it.... The modifications include, among other things, the installation of a new arming, fusing and firing mechanism,...."www.ananuclear.org. This results in a new weapon with new ground burst capabilities.

The Y-12 plant will receive S94 million in fiscal 2010 for work on the proposed new Uranium Processing Facility.

Secretary of Defense Gates has called for the passage of the twice rejected Reliable Replacement Warhead program. Current nuclear weapons are expected to be reliable for up to 85 years.

While the U.S. and Russia are negotiating the extension of the Comprehensive Test Ban Treaty, it will require the approval of 67 senators and *will not result in one nuclear weapon being dismantled.*

CD004

Page 2 of 2

1|1.D 2|9.B 3|1.B 4|1.C We do not want, do not need, and should not tolerate further production of nuclear weapons. They are not simply bigger bombs, are not useable, and are the means of ending all human and animal life on the planet. New nuclear weapons and new nuclear weapons facilities should not be built. The Y-12 facility function should be *dismantling* of nuclear weapons in negotiated verifiable steps with other nuclear weapons countries. Furthermore, our nuclear weapons policy should unequivocally renounce first strike use and abandon implicit threats of use against non-nuclear countries. We should end all actions that drive non-nuclear countries to seek nuclear weapons and begin finally to implement our obligations---long ignored---under the Nuclear non Proliferation Treaty.

Sincerely,

Vic Macks

Vic Macks

Gail Macks

Gail Macks

copy to:

President Barack Obama
The White House
1600 Pennsylvania Avenue
Washington, DC 20500

Senator Carl Levin
269 Russell Office Building
U.S. Senate
Washington, DC 20410-2202

Senator Debbie Stabenow
133 Hart Senate Office Building
Washington, DC 20510

Congressman Sander Levin
1236 Longworth House Office Building
Washington, DC 20515

CD005

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Nov 25 2009 10:22AM

CD005

Draft Y-12 Site-wide
Environmental Impact Statement---
U.S. Department of Energy
National Nuclear Security Administration

NNSA

Written Comment Form

Must be received on or before January 29, 2010

Dear Ms. Gorman,

1|13.0 I am in support of bringing the Uranium Processing facility to Oak Ridge, TN.

Thank you.

Please use other side if more space is needed.

Comment forms may be mailed to:
Ms. Pam Gorman
Y-12 SWEIS Document Manager
800 Oak Ridge Turnpike, Suite A-500
Oak Ridge, TN 37830

Comment forms may be faxed to:
(865) 483-2014
or sent by email to:
y12sweis-comments@jacobs.com

You may also submit comments through the project website which can be found at:
http://www.Y12sweis.com

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SOMETIMES YOU ONLY GET ONE CHANCE TO CHANGE THE FUTURE...

THE FUTURE IS CALLING. THIS IS OUR CHANCE TO CREATE THE WORLD WE WANT TO LIVE IN. WE, THE UNDERSIGNED, SAY NO! TO THE CONTINUED PRODUCTION OF NUCLEAR WEAPONS IN OAK RIDGE, TENNESSEE.

1|1.D **The November 17 public hearing for the Draft Y12 Site Wide Environmental Impact Statement will be our only chance to say NO! to continued nuclear weapons production in Oak Ridge, Tennessee. Despite President Obama's commitment to pursue a world free of nuclear weapons, the National Nuclear Security Administration is proposing a new bomb plant in Oak Ridge to make thermonuclear secondaries for nuclear weapons—the secondary is the fusion part of the bomb that turns an atomic bomb into a thermonuclear holocaust. Y12 is the only place in the US that makes them. We believe Y12 must not corrupt the President's vision. Y12 should commit itself to the dismantlement of nuclear weapons. There is currently a 15 year backlog of retired weapons in Oak Ridge awaiting dismantlement, with more to come. Former Secretary of State George Shultz says, "We are at a tipping point. The simple continuation of present practice with regard to nuclear weapons is leading in the wrong direction. We need to change the direction."**

2|9.C

3|9.B

	Signature	Printed name	Address
1		GAYLORD BAKER	26 CHESTNUT LOG, BLACKSBURG, NC 28711
2		Leah R. Karpen	400 Charlotte St Asheville 28801
3		Steven L. Gilman	P.O. Box 18572, Asheville, NC 28814
4		Mary Olsen	PO Box 7516 Asheville, NC 28802
5		BRITA L. CLARK	10 CHESTNUT CREEK RD CANDLER, NC 28715
6		Stanley G. Dienst	622 Rugby View Place Hendersonville NC 28791
7		DON RICHARDSON	577 Windover, Brevard 28712
8		John Joyner	337 Forest View Dr. Asheville 28804
9			
10			

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With our signatures signed on this statement we declare our opposition to construction of a new nuclear bomb plant. We believe that the US must stop planning to kill people. Democracy is not learned by killing people.

1|14.0 Reducing the square footage of facilities in the high security area, and in the total building is simply a cosmetic jesture to facilitate continuing to make bombs, weapons to kill. Developing smaller more lethal weapons is not the answer. The hard truth is that mass destruction weapons are designed to kill indiscriminately and to condemning vast numbers of survivors to incredible suffering.

2|1.E You threaten Korea and Iran for efforts to develop nuclear power, while you continue to build death weapons, poison the earth, air, and streams causing suffering, disease and death pretending to keep the peace. First take the log out of your own eye. Then you will be better able to help your neighbor.

3|12.F A Chinese scientist studying radioactivity in animals living near Y-12 found that of 100 area deer bagged every one tested radioactive, unfit for man or beast. Animals, birds, water fowl cannot read signs posted by the stream along the Y-12 perimeter warning "stay out of the water". Wherever they go their radioactive feces, urine and carcasses poison other living beings. This monstrous practice fails to consider what is good for life on the planet. Victims of blind greed become ill, suffer and die.

4|10.B Were this the only objection it would still justify rejecting any new nuclear bomb plant construction. Cleaning up this 50-yr. poisoning of our land will cost huge amounts of financial and human resources.
Billions of dollars could finance a national health care plan or a housing construction that could put all our citizens in decent housing and eliminate sleeping under bridges and hungry people begging for food. It could finance scholarships for indigent students. The Y-12 nuclear program robs the nation of resources needed to provide a better life for our own citizens. You have been aiding and abetting this robbery. Streams poisoned by your mercury dumping

3|12.F (cont) make the fish unfit for human consumption. It would appear that noone has attempted to determine how many years it will take to cleanse this poison so carelessly dumped.

My signature here affirms my opposition to all construction of any new nuclear bomb plant.

	Asheville, NC 28804
Deborah M. Boyce	Asheville NC 28804
Harlan Richardson	Asheville NC 28804
Sarah A. Braun	Asheville NC. 28804
Dorothy DeLeeuw	Asheville, NC. 28804
Kathleen Ryan	Asheville NC 28806

PUBLIC HEARING—OAK RIDGE, TN

November 17, 2009-Evening Session

13.0	Commentors support the Capability-sized UPF Alternative.
13.0	Commentors support the UPF.
13.0	Commentors support the continued operations at Y-12.
3.B	Commentors state there is no need for the UPF.
3.A	Commentors state there is no need for continued life-extension work or new weapons production.
1.E	Commentors state that the most critical mission need that we have in pursuit of nonproliferation goals is the safe, secure, and verifiable capacity for increased dismantlement and disposition of warheads.
9.A	Commentors state that there is a need for passive curatorship of the current arsenal and that need can be achieved through consolidation, downsizing, and upgrading-in-place the current facility, which is already in the plan. A sixth alternative should be added to the SWEIS and considered by NNSA. Alternative 6 recognizes a need for a Stockpile Stewardship mission that can be achieved through an upgrade in place to existing facilities. It recognizes the increasing demand for a verifiable safeguarded dismantlement capacity which must be addressed. Current facilities should be analyzed. And if there is a need, [NNSA] can construct a new dismantlement facility. The benefits of such an alternative include workforce retention and the reduction of the high-security area.
14.0	Commentors are opposed to the construction of any facility in Oak Ridge or anywhere else that could now or, through modifications, in the future produce new nuclear weapons.
9.B	Commentors support the construction of a facility that can expedite dismantlement. This new facility must be a strict single-use plant for dismantling weapons with no possibility of being modified into a plant that produces new nuclear warheads.
10.D	Commentors are opposed to the use of taxpayer's money and resources on nuclear weapons.
12.L	Commentor is concerned with the wastes that will be generated through nuclear weapons operations.
10.B	Commentors stated that money could be better spent on other social purposes.

3.A Commentors stated that there is no moral justification, no moral rationale for the acquisition of more nuclear weaponry.

1.C Commentors stated that the U.S. must demonstrate to the rest of the world and to ourselves our commitment to reducing our stockpile of nuclear weapons to zero; leading the world in the right direction.

12.E Commentor expressed concern with potential earthquakes at Y-12.

11.A Commentors expressed concern over potential terrorist attacks at Oak Ridge.

2.B Commentor registered complaint that the hearings are being held in the middle of the week and had to lose three days of paid work to be able to attend. Commentor added that there were some people who wanted to come but couldn't because of the inconvenience.

1.E Commentor stated that the UPF decreases the United States' credibility in being able to convince Iran and North Korea and other countries that they cannot have nuclear weapons.

15.A Commentor stated that the consequences of using the nuclear weapons must be assessed.

12.J.1 Commentor expressed concern over cancer to workers.

1.A Commentor stated that the SWEIS was proceeding based on the 2001 Nuclear Posture Review without waiting for the President's new Nuclear Posture Review.

12.J.2 Commentor expressed concern over the impacts to health from the Oak Ridge environment.

13.0 Commentors support NNSA's commitment to national security.

13.0 Commentors support modernization at Y-12.

12.G.1 Commentor urges NNSA to maintain and preserve just three of the World War II era buildings, each of which meet the National Register criteria and are needed to tell Y-12's story to future generations. These buildings are 9204-3, 9731, and 9706-2. Each of them meets the requirements of the National Historic Preservation Act as historic properties and should be preserved for future generations.

14.0, 10.D Commentors are opposed to nuclear weapons and spending taxpayer money on anything but dismantling them.

1.F Commentors stated that it would be globally dangerous for the United States to construct the proposed facility which would produce secondaries and other nuclear weapons components.

3.A Commentors stated that nuclear bombs are immoral.

9.C Commentors stated that the SWEIS doesn't include any alternative that supports and that's consistent with the President's foreign policy but, indeed, would undermine it.

12.O Commentor stated that the SWEIS does not mention the past 60 years of contamination and pollution that has occurred due to the processing of uranium and nuclear matter here; and so, therefore, there's no mention on really how to keep that from occurring or continuing to occur.

1.C Commenors stated that in order for non-proliferation to work, there must be dismantling of nuclear weapons and a plan to reduce those weapons to zero in a reasonably period of time.

PUBLIC HEARING—OAK RIDGE, TN

November 18, 2009-Morning Session

13.0	Commentors expressed support for the continued operations at Y-12 and modernization.
13.0	Commentors support the Capability-sized UPF Alternative.
13.0	Commentors support the UPF.
12.P	Commentors stated that the Integrated Facilities Disposition Project is key to Y-12 modernization efforts and must be fully incorporated into the SWEIS and Record of Decision.
13.0	Commentors support the Complex Command Center.
13.0	Commentors opposed the No Action Alternative (Alternative 1).
2.A	Commentor thinks the SWEIS assessment is thorough and accurate.
9.A	Commentor contends that the dismantlement option is already embodied in UPF.
4.0, 8.0	Commentor stated that Alternatives 1 and 5 do not provide long-term capability to execute our necessary mission.
6.0	Commentor stated that Alternative 3 will not solve the underlying issues with existing facilities.
2.B	Commentor stated that the timing of this hearing, 12 working days after the Federal Register Notice of Availability, embarrasses the Department of Energy's commitment to meaningful public participation. Commentor added that DOE reneged on its promise of a 30-day period to allow review of the document before the public hearing.
9.D	Commentor stated that the proposals for a UPF, whatever size, fail to address the growing need for dismantlement capacity. There is no discussion of the overlap of dismantlement and production operations. There is no discussion of the backlog of secondaries awaiting dismantlement which already present a problem for Y-12. This critical mission need for the United States is absent in the SWEIS.
2.F	Commentor stated that the Site-Wide EIS should provide a comprehensive analysis of the environmental situation at Y-12 so the public can understand the nature of potential impacts by all proposed activities at the site.

2.F Commentor stated that DOE violated its own regulations to prepare a SWEIS every 5 years by delaying the Site-Wide EIS and by using the SWEIS to analyze the UPF.

1.E.1 Commentor stated that the Site-Wide EIS does not address proliferation concerns inherent in the proposal to build a new weapons production facility. Commentor added that past NEPA analyses have included proliferation concerns.

1.A Commentor stated that the SWEIS does not consider studies which have not yet appeared, but which will have a profound impact on the very premise of the Site-Wide EIS. Commentor expressed the opinion that these reports and events over the next seven months are likely to further erode the power of arguments for the UPF. Commentor offered an example of the JASON Report (which commentor said was released the morning of November 18), which will state there is no evidence that the stockpile is at risk, refuting the primary arguments being put forward for new production capacity as part of the modernization discussion.

1.A Commentor stated that NNSA must incorporate the JASON Report, the Nuclear Posture Review, the START Treaty renewal, and the actions of the U.S. leading up to and during the Nonproliferation Treaty review.

2.A Commentor stated that the Site-Wide EIS is being asked to bear a burden that Side-Wide EIS's are not designed to bear, it fails to provide the comprehensive analysis a Site-Wide EIS should present. There is insufficient depth and breadth in the analysis of activities and their impacts at Y-12.

3.A Commentor stated that there is no need for a new uranium bomb plant because the renewal of the START Treaty with Russia will reduce the nuclear warhead stockpile and it will continue to go down.

9.A Commentor stated that the SWEIS needs Alternative 6, which includes passive curatorship of the current stockpile to assure safety and security performed in consolidated, downsized, and upgraded existing facilities at Y-12, and construction of a new dismantlement facility with designed-in safeguards and transparency to process the current backlog and accommodate increased retirement of warheads and the eventual dismantlement of the entire U.S. arsenal.

1.E Commentor stated that building the UPF will trigger nuclear proliferation, and that the U.S. is hypocritical when it attempts to discourage other nations from pursuit of nuclear capability while expanding our own capacity.

COMMENT RESPONSE DOCUMENT, CHAPTER 3: COMMENT SUMMARIES AND RESPONSES

INTRODUCTION

This chapter summarizes all of the comments the National Nuclear Security Administration (NNSA) received on the *Draft Site-Wide Environmental Impact Statement for the Y-12 National Security Complex* (Y-12 SWEIS) and provides NNSA's responses to those comments. As discussed in Chapter 1 of this Comment Response Document (CRD), NNSA received 353 comment documents on the Draft Y-12 SWEIS from Federal agencies; state, local, and tribal governments; public and private organizations; and individuals. In addition, during the public hearings that NNSA held, 108 speakers made oral comments. NNSA has placed this material, including the names of commentors, comment summaries, and the public hearing transcripts on the project website (www.y-12sweis.com).

Although the public comment period for the Draft Y-12 SWEIS closed on January 29, 2010, NNSA was able to process all comments related to the SWEIS that it received. This CRD includes responses to all comments that were received. Comments that were received on the Wetlands Assessment of the Haul Road extension are also contained in this CRD.

HOW NNSA CONSIDERED PUBLIC COMMENTS

NNSA assessed and considered public comments on the Draft Y-12 SWEIS, both individually and collectively. Some comments led to SWEIS modifications; others resulted in a response to answer or explain policy questions, to refer readers to information in the SWEIS, to answer technical questions, to explain technical issues, or to provide clarification. A number of comments provided valuable suggestions on improving the SWEIS. As applicable, the responses in this chapter identify changes that NNSA made to the SWEIS as a result of comments.

The following list highlights key aspects of NNSA's approach to capturing, tracking, and responding to public comments on the Draft SWEIS:

- At the beginning of the public comment period, NNSA reviewed the prior scoping comments to develop a list of major issue categories as a starting point for capturing and tracking public comments that were anticipated on the Draft SWEIS. As comments were received, they were reviewed and "binned" into applicable issue categories, or into new issue categories that were created. Because binning was a continuous process during the public comment period, issue categories were expanded and augmented as necessary to ensure that comments were binned into a proper issue category. If an existing comment bin was not specific enough, a new bin was created. Additionally, because comments relevant to some of the original issue categories were not raised by the public, some of the issue categories developed by NNSA were not used.

- NNSA reviewed and considered every comment received, including written and oral comments made during the public hearings, to identify, categorize and summarize those

comments. As shown in Chapter 2 of this CRD, the written documents received have been annotated with sidebars and comment codes. Those sidebars and codes provide the information that identifies where those comments are addressed. In some cases, multiple comment codes were assigned to a comment to indicate that an identified comment was considered in multiple comment summaries and responses. Chapter 2 of this CRD also identifies the oral comments that were made during the public hearings.

- After comment identification, NNSA grouped individual comments by categories and assigned each comment group to an expert in the appropriate discipline to address the comment.

- Comment summaries are intended to capture the substantive issue(s) raised by a comment. Comments grouped and summarized for response are, of necessity, paraphrased, but NNSA made every effort to capture the essence of comments included in a comment summary. If the meaning of a comment was not clear, NNSA attempted to interpret the comment and respond based on that interpretation. In some cases, NNSA used specific language from one or more commentors to develop a particular comment summary. This should not be interpreted to mean that NNSA considered any comment to be more or less important than other comments received relative to that comment summary; rather, NNSA felt that a comment's particular language was a reasonable articulation of many comments for a particular subject. In some cases, a commentor submitted a comment that was unique, so that it was responded to individually.

- In some instances, a comment summary and response are related to another comment summary and response. In these instances, the comment response directs the reader to that related comment summary and response.

- Each comment summary and response in Chapter 3 was reviewed by a variety of experts to ensure technical and scientific accuracy, clarity, and consistency, and to ensure that the response addressed the summarized comments.

In this process, NNSA has attempted to provide an accurate record of the comments received, as well as NNSA's responses to those comments. The responses indicate whether any changes were made to the Y-12 SWEIS and the reasons for making those changes. Section 1.3 of this CRD describes the organization of this CRD and the tables provided in Chapter 1 are designed to assist readers in tracking their comments to the appropriate comment summary and response. Each commentor should readily be able to locate their comment, the comment summary in which those comments were summarized, and the response that addresses those comments.

ORGANIZATION OF COMMENT AND RESPONSE SUMMARIES

The comment summaries and responses that follow are organized within issue codes, as shown in Chapter 1, Table 1.3-1, of this CRD. For example, issue code 1.0 contains comments related to nuclear weapon policies. Within this issue code, specific comment summaries and responses related to topics such as Presidential Decision Directives, the Nuclear Posture Review (NPR), new weapons design, the *Comprehensive Test Ban Treaty*, and nonproliferation may be found.

Depending upon the comments that were received on the Draft SWEIS, some topics within an issue code contain many comment summaries and responses. Comment summaries and responses within issue codes are not presented in any particular order of importance.

In some instances, a similar topic is addressed in multiple comment summaries and responses. This occurred due to the fact that comments were often intertwined, and the binning process captured these comments in multiple issue codes. While this resulted in some redundancy within some of the comment summaries, NNSA decided that redundancy was preferred to the potential of omitting some comments. In those instances where similar topics are addressed in multiple summaries and responses, cross-references are provided to the similar summary and response.

COMMENT SUMMARIES AND RESPONSES

1.0 NUCLEAR WEAPON POLICIES - GENERAL

1.A NUCLEAR POSTURE REVIEW, JASON REPORT

Commentors stated that the SWEIS does not consider studies which had not yet been published, but which will have a profound impact on the very premise of the Site-Wide EIS. Commentors expressed the opinion that these reports and events over the next seven months are likely to further erode the power of arguments for the UPF. Commentors offered an example of the JASON Report ("Lifetime Extension Program"), which states there is no evidence that the stockpile is at risk, refuting the primary arguments being put forward for new production capacity as part of the modernization discussion. Commentors stated that NNSA must incorporate the JASON Report, the NPR, the Strategic Arms Reduction Treaty (START) renewal, and the actions of the U.S. leading up to and during the Nuclear Nonproliferation Treaty (NPT) review. Commentors stated that the SWEIS was proceeding based on the 2001 NPR without waiting for the President's new NPR. Commentors stated that completion of the SWEIS should be delayed until the release of the pending Nuclear Posture Review so that the UPF can be more fully assessed. One commentor stated that NNSA should wait until Y-12's mission requirements are clearer because until then it is inefficient to focus examination on a specific proposal and place an unnecessary burden on the public to address hypothetical scenarios.

Commentors raised the following major issues related to the NPR and JASON Report:

- The SWEIS process is flawed and presumptuous because it fails to take into account the anticipated changes that will be implemented in the new NPR due in 2010. In order to be timely and reasonable, the Draft SWEIS should proceed on the basis of the 2010 NPR and its force structure so that the public can better comment on alternatives.
- According to the recent JASON report certifying the reliability of the U.S. arsenal, a program of surveillance and maintenance will be sufficient to guarantee the reliability of the existing U.S. stockpile in the foreseeable future. There is no need for expanded warhead production capacity.

Response: *NNSA considered relevant reports and studies that were available to determine the need for Y-12 activities and operations, the purposes to be achieved, the reasonable alternatives*

to be analyzed, and the scope of the SWEIS. Section 1.5 of the SWEIS addresses national security considerations relevant to the SWEIS. The NPT and other arms control treaties, such as treaties with Russia, are discussed in Section 1.5.1. The 2010 START Treaty with Russia ("New START") is discussed in Section 1.5.1. Relevant national security requirements, including the 2010 NPR, are discussed in Section 1.5.2.

NNSA thinks the SWEIS alternatives are consistent with, and supportive of, any reasonably foreseeable national security requirement. The requirements NNSA uses to define its programmatic needs are established by: the current Presidential Decision Directives (PDDs), which define the current and projected stockpile levels; the Nuclear Weapons Stockpile Plan (NWSP), which specifies the types of weapons and quantities of each weapon type by year; policies and statutes (such as annual appropriation acts); and the judgment of NNSA in consultation with the Department of Defense (DoD) and experts at NNSA's national laboratories. Based on these requirements, NNSA makes reasonable predictions as to the necessary configuration and capacity of the nuclear security enterprise for the future. The SWEIS analysis is consistent with and supports these national security requirements and policies. All of the alternatives in the SWEIS provide a capability to perform the functions necessary to maintain a safe, secure, and reliable stockpile. As a result, NNSA does not think it is necessary to delay the SWEIS.

The SWEIS was designed to cover a range of stockpile/capacity options that could result from the 2010 NPR. As discussed in Section 1.5.2, the 2010 NPR specifically concludes that a UPF is a key investment required to sustain a safe, secure, and effective nuclear arsenal. The UPF would be designed with a weapon production and dismantlement capacity consistent with the 2010 NPR and New START Treaty.

NNSA has considered the JASON Report mentioned by the commentor and agrees that one of the major conclusions of that report was that there is no evidence that accumulation of changes incurred from aging and the Life Extension Program (LEP) have increased risk to certification of today's deployed nuclear warheads. However, NNSA does not agree that this report refutes the need for new production capacity as part of the modernization discussion. See comment-response 1.C for a discussion of the NPT.

1.A.1 SIZE OF PROJECTED U.S. STOCKPILE

Commentors stated that by the time a new UPF would come online in 2018, the U.S. stockpile of warheads will exceed the maximum number allowed by the START Treaty. Commentors believe that there is no need for expanded warhead production capacity because a significant backlog of 10–15 years of retired warheads is awaiting dismantlement. Commentors stated that there is an expectation that the demand for production capacity will decline to near zero over the next 40 years, while demand for dismantlement/disposition capacity will increase. Commentors believe that the need for new production facilities should be predicated on this expectation.

Response: *The number of weapons in the U.S. nuclear weapons stockpile is consistent with all arms control treaties. The New START Treaty is discussed in Section 1.5.1. As discussed in that section, the New START Treaty would reduce deployed warheads to 1,550, which is about*

30 percent lower than the upper warhead limit of the Moscow Treaty, which entered into force in 2003 and commits the U.S. and Russia to deep reductions (i.e., to a level of 1,700-2,200 operationally deployed strategic nuclear warheads by 2012).

NNSA has no reason to believe that the nuclear weapons stockpile in 2018 will not be consistent with all arms control treaties. The size of the U.S. stockpile will be consistent with requirements established by PDD, the NWSP, policies, statutes, and the judgment of NNSA in consultation with DoD and experts at NNSA's national laboratories. The UPF would be designed with a weapon production and dismantlement capacity consistent with the 2010 NPR and New START Treaty. For information on dismantlements, see comment response 9.D. For information on a "zero stockpile," see comment response 1.C.

1.B PRESIDENTIAL DIRECTIVES, PUBLIC LAW, AND CURRENT POLICIES

Commentors stated that U.S. nuclear weapons policy should renounce first strike use, abandon implicit threats of use against non-nuclear countries, and end all actions that drive non-nuclear countries to seek nuclear weapons. Commentors stated that President Obama's current policy is to work towards a world without nuclear weapons. Commentors believe that nuclear weapons play an important role as a deterrent and ensure our national security and freedoms. Commentors stated that the Comprehensive Test Ban Treaty (CTBT) must be ratified by Congress and must apply to the U.S. Commentors stated that Under Secretary of State Ellen Tauscher said that the NNSA will maintain the nuclear stockpile without adding to its capabilities, without testing and "without causing people to be concerned about what we are doing."

Response: *Section 1.5 of the SWEIS addresses national security considerations relevant to the SWEIS. Arms control treaties, including the New START Treaty, are discussed in Section 1.5.1. Potential changes in national security requirements, including a discussion of the 2010 NPR, are discussed in Section 1.5.2. In order to meet its national security requirements, NNSA makes reasonable predictions as to the necessary configuration and capacity of the nuclear security enterprise for the future (see comment-response 1.A).*

NNSA believes the Draft SWEIS analysis accounts for present relevant and reasonably foreseeable national security requirements and policies. All of the alternatives in the SWEIS provide a capability to perform all of the functions necessary to maintain a safe, secure, and reliable stockpile. NNSA has no basis to predict that nuclear weapons will not be a part of this Nation's national security policy over the time period covered in this SWEIS. The range of alternatives analyzed in this SWEIS covers the range that NNSA believes could reasonably evolve from any changes to national policy with regard to the size and number of nuclear weapons in the foreseeable future. With respect to the issues of first strike use, use of nuclear weapons against non-nuclear countries, actions that drive non-nuclear countries to seek nuclear weapons, and ratification of a CTBT, those issues are beyond the scope of the SWEIS. However, as stated in the 2010 NPR, the Administration believes that "Ratification of the CTBT is central to leading other nuclear weapons states toward a world of diminished reliance on nuclear weapons, reduced nuclear competition, and eventual nuclear disarmament." The 2010 NPR also declares "that the United States will not use or threaten to use nuclear weapons against

non-nuclear weapons states that are party to the NPT and in compliance with their nuclear nonproliferation obligations." NNSA acknowledges the statement of Undersecretary of State Ellen Tauscher and believes the SWEIS is consistent with this statement.

1.B.1 MOSCOW TREATY, TREATY OF 2010

A commentor stated that the Draft SWEIS contradicts itself with regard to current stockpile requirements. Section S.1.5.1 of the Draft SWEIS states that, "The Moscow Treaty…commits the U.S. and Russia to deep reductions (i.e. 1,675 operationally deployed strategic nuclear warheads by 2012)." The very next sentence in the Draft SWEIS states that, "As of May 2009, the U.S. had cut number of operationally deployed strategic nuclear warheads to 2,126, which meets the limits set by the Treaty for 2012."

Response: *NNSA agrees; the phrase "which meets the limits set by the Treaty for 2012" has been deleted from the second sentence.*

1.C TREATY ON NONPROLIFERATION; ZERO WEAPONS

Commentors stated that U.S. needs to abide by the NPT by dismantling nuclear weapons, keeping nuclear waste secure, and not building new weapons. Commentors believe that the U.S. must demonstrate to the rest of the world, and to its citizens, our commitment to reducing our stockpile of nuclear weapons to zero; leading the world in the right direction. Some commentors stated that it defies common sense to think that a program designed to extend the life of the U.S. nuclear stockpile for the indefinite future is in compliance with the NPT, in which the U.S. promised to pursue in good faith complete disarmament at an early date. The commentors questioned DOE's assertion in the 1996 SSM PEIS that the Stockpile Stewardship Program is fully consistent with U.S. obligations under the NPT.

Response: *Section 1.5 of the SWEIS addresses national security considerations. As discussed in that section, the United States has worked for many years to help establish an international security environment conducive to progress toward disarmament. The United States has also made significant progress toward achieving the nuclear disarmament goals set forth in the Preamble and Article VI to the NPT, and has a strong record of compliance with its Article VI obligations. The United States has taken dramatic steps toward the goal of nuclear disarmament, including working to resolve destabilizing global and regional tensions; reducing its nuclear forces and nuclear weapons stockpile, through both unilateral and bilateral initiatives; and working cooperatively with allies and partners further to reduce nuclear threats.*

However, even after the Cold War, international dangers remain, and nuclear deterrence will continue to be a cornerstone of U.S. national security policy for the foreseeable future. NNSA's responsibilities for ensuring the safety and reliability of the U.S. nuclear weapons stockpile will also continue. Under the NPT, the parties agreed not to transfer nuclear weapons or other devices, or control over them, and not to assist, encourage, or induce nonnuclear states to acquire nuclear weapons and have agreed 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 (Article VI)." However, the treaty does not mandate disarmament or specific stockpile reductions by nuclear states, and it does not address actions of nuclear states in maintaining their stockpiles.

NNSA believes that the Stockpile Stewardship Program is fully consistent with U.S. obligations under the NPT. The purpose of the Stockpile Stewardship Program is to maintain the safety and reliability of the U.S. nuclear weapons stockpile. Stockpile stewardship contributes positively to U.S. arms control and nonproliferation policy goals by providing the United States with continued confidence in its weapons to allow further reductions in stockpile size and to meet its NPT Article VI obligations. Unilateral denuclearization is not a reasonable alternative for this SWEIS because it does not satisfy current national security policy.

1.D NEW WEAPONS

Commentors state that there should be no new nuclear weapons production or nuclear weapons facilities. Some commentors expressed their opposition to continued production of nuclear weapons in Oak Ridge. One commentor stated that anything that can be construed as a new generation of nuclear weapons sends a wrong message to the world. Commentor added that there is no justification for building new secondaries, as existing ones are supposed to be dismantled and there is no rationalization to create a larger facility to create larger numbers of secondaries. Commentor also said that new weapons designs will ultimately require new tests for deployment. Some commentors asserted that the U.S. has now disavowed new warhead production or design and significant modifications to the existing stockpile, in an effort to demonstrate the seriousness of the U.S. commitment to nonproliferation. As the U.S. commitment to nonproliferation grows, the need for the UPF80 evaporates. One commentor referred to the statements from Under Secretary of State Ellen Tauscher in January 2010, affirming that the U.S. will not pursue new warhead design or expanded military capabilities for the nuclear arsenal.

Response: *Decisions on the type and number of warheads that this nation requires for national security are made by the President and the Congress and not by NNSA, and are beyond the scope of this SWEIS. None of the alternatives expand warhead production capacity. Two of the alternatives (Alternative 4 and 5) would actually reduce Y-12 capacity. Regardless of capacity, NNSA is required to maintain nuclear weapons production capability, including the capability to design, develop, produce, and certify new warheads. Maintenance of the capability to certify weapon safety and reliability requires an inherent capability to design and develop new weapons. NNSA has not been directed to produce new-design nuclear weapons. Additionally, the 2010 NPR states that, "The United States will not develop new nuclear warheads."*

1.E PROLIFERATION AND NONPROLIFERATION

Commentors stated that the most critical mission need that we have in pursuit of nonproliferation goals is the safe, secure, and verifiable capacity for increased dismantlement and disposition of warheads. Commentors stated that building the UPF will trigger nuclear proliferation, and that the Unites States is hypocritical when it attempts to discourage other nations from pursuit of nuclear capability while expanding our own capacity. Commentors stated that the UPF decreases the United States' credibility in being able to convince Iran and North Korea and other

countries that they cannot have nuclear weapons. Commentors expressed concern about other countries launching arms race if more nuclear weapons are produced in America. Commentors stated that President Obama supports disarmament as his nuclear weapons policy and Alternative 5 will trigger nuclear proliferation. Commentors believe that the analysis of nonproliferation from the Stockpile and Stewardship PEIS cannot be relied on in 2010 because the geopolitical context for nuclear nonproliferation discussions has changed dramatically since 1996. Hence a thorough consideration of the nonproliferation impacts, circa 2010, of the proposal to build a new nuclear weapons production facility as part of a complex-wide effort to reconstitute full-scale warhead production capacity is imperative. Commentors added that if the NNSA believes it can move forward with a UPF, or a UPF80, or even an "expandable" UPF5 without undermining U.S. nonproliferation efforts in 2010, it has a responsibility to explain its rationale and subject it to external review. Some commentors stated that the arguments in favor of UPF have, almost without exception, been used for more than 20 years to justify weapons facilities in Oak Ridge, but changes in U.S. policy, concern over nuclear proliferation, and global realities have created an environment in which the power of arguments for new nuclear weapons production facilities has been eroded significantly.

Response: *Section 1.5.1 of the SWEIS addresses NPT compliance. The U.S. has worked with other nations to limit nuclear proliferation around the world. The current Administration is committed to limiting proliferation and continues to negotiate with other countries.*

NNSA believes that the United States nuclear weapons program, including modernization efforts (such as building a UPF) and life extension programs, has not had and will not have any impact on either horizontal (increasing the number of nuclear weapons states) or vertical (increasing the number of nuclear weapons in nuclear weapons states) proliferation. The United States nuclear weapons programs are not the only factors that might affect whether other nations might develop nuclear weapons of their own. Some nations that are not declared nuclear states have the ability to develop nuclear weapons. The credibility of the United States nuclear umbrella is an extremely significant restraint to proliferation. Continued United States engagement in security cooperation with allies including a military presence, modern and flexible military forces, and the extension of a smaller but safe, reliable and capable nuclear deterrent to allies are key elements in assuring them that they can count on the United States, and do not need to seek their own nuclear forces. The loss of confidence in the safety or reliability of the weapons in the United States stockpile could result in a corresponding loss of credibility of the United States nuclear deterrent and could provide an incentive to other nations to develop their own nuclear weapons programs.

Proliferation incentives for other countries, such as international competition or the desire to deter conventional armed forces, would remain unchanged regardless of whether NNSA implemented any of the alternatives analyzed in the SWEIS. NNSA and other agencies of the United States government participate in many government-to-government negotiations intended to reduce the risks of nuclear proliferation. NNSA believes that the previous analysis of the Stockpile Stewardship Program in the SSM PEIS regarding nonproliferation remains valid. See comment-response 1.E.1 for more detailed information related to a proliferation analysis.

1.E.1 SWEIS SHOULD INCLUDE PROLIFERATION ANALYSIS

Commentors stated that the Site-Wide EIS does not address proliferation concerns in detail inherent in the proposal to build a new weapons production facility, a shortcoming which must be rectified in the final SWEIS—or addressed in a Supplemental EIS on Nonproliferation Impacts. Commentors added that the Y-12 SWEIS refers instead to nonproliferation analysis prepared for the Stockpile Stewardship and Management PEIS in 1996, asserts the program is fully consistent with U.S. obligations under the Nonproliferation Treaty, and further asserts the analysis remains valid. Commentors stated that the SWEIS should include an analysis of the impact of the SWEIS on the prospects for the U.S. to move the world towards reduction and elimination of nuclear weapons. Commentors stated that past NEPA analysis have included proliferation concerns.

Response: *The SWEIS was prepared by NNSA in response to the requirements of NEPA and the DOE and CEQ regulations, and NNSA believes that the Draft SWEIS meets these regulations. Although some NEPA documents (such as the Commercial Light Water Reactor EIS [DOE/EIS-0288, March 1999]), have included a discussion of proliferation, such an analysis is not required in an EIS. NNSA believes that the previous analysis of the Stockpile Stewardship Program in the SSM PEIS regarding nonproliferation remains valid. However, NNSA may consider proliferation issues in any Record of Decision (ROD) process for the SWEIS. Any ROD issued will explain all factors that NNSA considered in making its decisions regarding the SWEIS.*

1.F INTERNATIONAL RELATIONS

Commentors stated that it would be globally dangerous for the United States to construct the proposed facility which would produce secondaries and other nuclear weapons components.

Response: *NNSA is responsible for ensuring the safety and reliability of the U.S. nuclear weapons stockpile. Section 1.3 of the SWEIS discusses the purpose and need for the UPF. As discussed in that section, a UPF would improve security and safeguards; improve efficiency of operations; improve worker protection; and reduce operating costs. NNSA does not agree that the UPF would be globally dangerous. See comment-response 1.E for a discussion of global considerations.*

2.0 NEPA PROCESS

2.A GENERAL NEPA PROCESS AND COMPLIANCE

Commentors think the SWEIS assessment is thorough and accurate. Commentors stated that they do not have any substantive comments at this time.

Response: *NNSA notes this comment.*

2.B LENGTH OF COMMENT PERIOD, NUMBER/LOCATION OF PUBLIC HEARINGS

Commentors stated that the timing of this hearing, 12 working days after the Federal Register Notice of Availability, embarrasses the Department of Energy's commitment to meaningful public participation. Commentors added that DOE reneged on its promise of a 30-day period to allow review of the document before the public hearing. One commentor complained that after delaying the release of the Draft SWEIS for several years, NNSA has now declined to hold the public comment period open an extra 60 days to allow for an informed engagement with the public. Commentors registered complaint that the hearings are being held in the middle of the week and had to lose three days of paid work to be able to attend. Commentors added that there were some people who wanted to come but couldn't because of the inconvenience. Commentors requested an extension of the comment period because it runs through several holidays giving inadequate time to allow effective commenting.

Response: *NNSA followed CEQ and DOE NEPA requirements for notice and conduct of public meetings. On October 30, 2009, NNSA and the Environmental Protection Agency (EPA) announced the availability of the Draft SWEIS and announced the schedule for the public hearings (74 FR 56189). In that announcement, NNSA established a public review process of 66 days, which was significantly longer than the 45-day requirement. NNSA also provided 18 days of notice before the first public hearing, which was 3 days more than the requirement. NNSA conducted two public hearings for the Draft Y-12 SWEIS. NNSA held the hearings on different days and different times of the day (November 17 beginning at 6 p.m. and November 18 at 11 a.m.) in an attempt to maximize the public's opportunity to attend. These hearings enabled a substantial number of interested parties to participate and offer oral and written comments. In addition to public hearings, NNSA provided many other ways for interested parties to submit comments, including e-mail, via the internet, facsimile, and regular mail. All comments were considered equally, regardless of the manner submitted.*

As for the length of the comment period, the comment period was originally announced to end on January 4, 2010, which was 66 days after the publication of the EPA's notice of availability on October 30, 2009. At the first public hearing (November 17, 2009), NNSA announced an extension of the comment period until January 29, 2010. NNSA also published a notice in the Federal Register of this extension (74 FR 68599). Consequently, the public review process lasted 90 days, which is twice as long as required. With respect to the Wetlands Assessment that was added after publication of the Draft SWEIS, NNSA has allowed an 18 day public comment period under 10 CFR Part 1022, thus providing the public with an opportunity to comment on this aspect of the proposed project. Comments received on the Wetlands Assessment are addressed in comment-responses 12.T through 12.T.29.

2.E PUBLIC HEARING PROCESS

Commentors stated that according to NNSA, "NEPA ensures that environmental information is available to public officials and citizens before decisions are made and actions are taken," (Y-12 Draft SWEIS, p. 1-22). This has not been the case during the preparation of the Y-12 SWEIS. No formal opportunity for questions was provided during the public hearing—NNSA provided

instead a stand-up poster session with select personnel, a setting decidedly non-conducive to in-depth discussion of public concerns. Commentors further complained that requests by the Oak Ridge Environmental Peace Alliance (OREPA) for an informal work session that would permit questions and answers in order to fill in gaps in the Draft SWEIS and enhance public understanding of operations and requirements were flatly denied. Commentors requested that the State of Tennessee hold a public hearing on an Aquatic Resource Alteration Permit application for the UPF Haul Road and stated that it would be in NNSA's interest to take advantage of such a hearing to explain the proposal and its implications to the public through this process.

Response: *NNSA conducted the public hearings in accordance with the requirements of NEPA and the DOE and CEQ regulations. As part of the public hearing process, DOE held an open house prior to the start of each formal public hearing. The purpose of the open house was to provide a forum for the public to engage NNSA representatives in dialogue or ask questions regarding the Y-12 SWEIS, operations at Y-12, and other relevant subjects that public members desired to discuss. NNSA provided a wide variety of subject matter experts at the open house, including the Y-12 SWEIS Document Manager, environmental, safety and health specialists from Y-12, and project managers for various Y-12 operations, including the proposed UPF. This process provided ample opportunity for members of the public to present questions, receive answers, fill in any informational gaps related to the Draft SWEIS, and enhance public understanding of Y-12 operations and potential environmental impacts. Requests that the State of Tennessee hold a public hearing on a permit application are beyond the scope of the SWEIS. See comment responses 12.T through12.T.29 for more information on the UPF Haul Road and associated permits.*

2.F NEPA COMPLIANCE

Commentors stated that DOE violated its own regulations to prepare a SWEIS every 5 years by delaying the SWEIS and by making it UPF-centered. Commentors stated that Y-12 SWEIS failed to consider all reasonable alternatives as required by law. Commentors stated that the SWEIS should provide a comprehensive analysis of the environmental situation at Y-12 so the public can understand the nature of potential impacts by all proposed activities at the site. One commentor argued that the second SWEIS started in 2005 was based on the desire to move forward with construction of the UPF, rather than a Supplement Analysis as required by NEPA regulations. Another commentor stated that the SWEIS is being asked to bear a burden that SWEIS's are not designed to bear, it fails to provide the comprehensive analysis a SWEIS should present— it analyzes two projects: UPF and the Complex Commend Center (CCC). There is insufficient depth and breadth in the analysis of activities and their impacts at Y-12. A commentor stated that the focus on the UPF to the exclusion of almost everything else at Y-12 has given short shrift both to the non-UPF activities and operations at Y-12 and to the more detailed considerations appropriate to a single-facility EIS. A commentor stated that NNSA was segmenting its NEPA analysis in order to minimize the overall impact of planned construction of facilities.

Response: *The SWEIS was prepared by NNSA in response to the requirements of NEPA and the DOE and CEQ regulations, and NNSA believes that the SWEIS meets those requirements. In preparing the SWEIS, NNSA used current and well-documented, well-known scientific models*

and data to analyze potential environmental impacts. The SWEIS provides a comprehensive analysis of the current environmental situation at Y-12, and of ongoing and reasonably foreseeable future operations, activities and facilities. The SWEIS includes an analysis of all proposed actions and reasonable alternatives which are ripe for analysis and decisionmaking. Consequently, NNSA disagrees that it has segmented its NEPA analysis.

The SWEIS includes an analysis of constructing and operating a UPF at Y-12 because NNSA decided to pursue such a facility in the ROD for the Complex Transformation SPEIS. Analyzing a project-specific action in a SWEIS, such as the construction and operation of a UPF or CCC, is appropriate. The process for preparing the SWEIS began on November 28, 2005, when NNSA published a Notice of Intent (NOI) in the Federal Register (70 FR 71270), announcing its intent to prepare this Y-12 SWEIS. The NOI was published less than 5 years after the March 13, 2002 ROD for the 2001 Y-12 SWEIS (67 FR 11296). According to the DOE NEPA regulations (10 CFR 1021.314) a Supplement Analysis is prepared to assist the agency in deciding whether to prepare the more rigorous and extensive analysis contained in an EIS. In this circumstance, NNSA had decided to prepare the more rigorous analysis. NNSA had originally planned to issue the Draft Y-12 SWEIS in late 2006; however, in October 2006, NNSA decided to prepare a supplemental programmatic environmental impact statement (SPEIS) related to transforming the nuclear security enterprise ("Complex Transformation SPEIS"). As a result, NNSA decided to delay the Draft Y-12 SWEIS until the programmatic decisions on the Complex Transformation SPEIS were made.

2.G SPECIFIC EDITORIAL COMMENTS ON THE SWEIS

Commentors had the following editorial comments on the Draft SWEIS (responses are provided under each specific comment):

1. Figure 5.1.1-2 does not indicate any significant excess or new construction facilities. For example UPF is not labeled as a new construction and facilities that are planned to be replaced are still labeled as operating.

Response: *Figure 5.1.1-2 has been updated to better reflect the optimum functional diagram of Y-12 in 2018.*

2. Discussions of disposal of LLW and MLLW should include more potential options for disposing of this waste. Will the proposed UPF include increased down-blend capacity?

Response: *The SWEIS analyzes the disposal of LLW and MLLW in accordance with existing disposal methods. Those disposal methods are consistent with the programmatic decisions DOE has previously made for these waste types (see Table 4.13.1-1). NNSA is not proposing to change these disposal methods, nor has NNSA identified any new reasonable alternative disposal methods not already analyzed.*

3. Section 3.2.2.1.1: Define Argus.

Response: *Argus refers to the special purpose, automated information security system that was developed at Lawrence Livermore National Laboratory. This information has been added to the SWEIS Glossary (Chapter 11). Argus is not an acronym.*

4. Section 3.3.5: Is the area under construction contaminated with mercury? Will excavated soils require treatment?

Response: *There is no section 3.3.5 in the Draft SWEIS. As such, this comment could not be located. However, Section 3.2.2.1.1 states that,* "Detailed testing would be conducted to fully characterize site geology, hydrology, and soil compaction, as well as to sample for radioactive contamination, mercury, and other materials of concern before construction." *The presence of mercury would be determined at that time, and a treatment decision made.*

5. Page 4-84: Groundwater treatment facility, please clarify this sentence, "The Groundwater Treatment Facility treats wastewater from the Liquid Storage Facility at Y-12 seep water collected at East Chestnut Ridge waste piles to remove VOCs, non-VOCs, and iron and elsewhere." Please clarify the "and elsewhere."

Response: *The sentence has been rewritten as follows: The Groundwater Treatment Facility treats wastewater to remove VOCs, non-VOCs, iron and other contaminants.*

6. Section 5.3: Power requirements are presented as annual usage in Table 5.1.1-1 but are presented as monthly consumption for Alt 2 and as a percentage of the No Action alternative usage for all of the other alternatives. These numbers should be presented on a consistent basis.

Response: *Although there is no Table 5.1.1-1 in the Draft SWEIS, but NNSA believes the commentor is likely referring to Table 5.3.1-1. NNSA has made changes to Section 5.3 to present electric power requirements on a consistent basis.*

7. Section 5.7.2.2 Operation: This section states that the UPF operation would require 105 million gallons of water per year, about 5 percent of the 2 billion gallons required by Alt 1. It goes on to say that overall use would decrease from 2 billion gallons per year to 1.3 billion gallons per year. If overall use and operations for the No Action alternative are the same (2 billion gallons per year), how come the UPF alternative increases overall use by 1.2 billion gallons per year? If the UPF operation requires only 5 percent of the No Action Alternative water usage, will the discharges into East Fork Poplar Creek (EFPC) also be 5 percent of the current discharge? How will this affect the raw water addition from the Clinch and what will be the impacts of this on EFPC? The effects of reduced discharges also need to be evaluated for Alternatives 4 and 5.

Response: *Current water usage at Y-12 is approximately 2 billion gallons per year. Once operational, the UPF would reduce average annual water usage at Y-12 from 2 billion gallons per year to 1.3 billion gallons per year. The 1.2 billion gallons per year is not an increase due to the UPF Alternative. Rather, the 1.2 billion gallons per year identified by the commentor*

reflects the water use of non-UPF missions at Y-12. Section 5.7.2.2 has been revised to clarify that overall water use at Y-12 is expected to decrease to 1.3 billion gallons per year under the UPF Alternative. Consistent with reduced withdrawals, the discharges into EFPC would be expected to decrease for Alternatives 2, 4, and 5. The impacts of these reduced withdrawals and discharges have been identified and added to Sections 5.7.2.2 and 5.7.7.

8. Table 5.13-1: Why would the document show the 2007 baseline waste generation as the construction waste for Alternative 1? The next table shows the same numbers as operations waste. If there is no construction involved in implementation of the No Action Alternative, then the column entries should say "None" rather than presenting the operations generated waste as construction generated.

Response: *In Table 5.13-1, the values listed under the No Action Alternative were presented in order to provide a basis for evaluating the amounts of wastes that would be generated for the "action alternatives" during construction. However, commentor is technically correct that there would not be any construction wastes during construction for the No Action Alternative and Table 5.13-1 has been revised to reflect this.*

9. Page 5.16, Paragraph 4, line 2: The number of monitored workers for the Capability-sized UPF Alternative given here (about 3,680) does not agree with the number of monitored workers for that alternative given in Table 3.2.4-1 on page 3-24 (i.e., 1,825).

Response: *The number "3,680" is incorrect and has been changed to "1,825".*

10. Paragraph 5.16, Paragraph 6, line 2: As above for the Capability-sized UPF Alternative, the number of monitored workers for the No Net Production/Capability-sized UPF Alternative (about 3,300) does not agree with the number of monitored workers for that alternative given in Table 3.2.5-1 on page 3-25 (i.e., 1,600).

Response: *The number "3,300" is incorrect and has been changed to "1600".*

11. Page 5-57, Paragraphs 1, 3, and 4: For the UPF Alternative, Capability-sized UPF Alternative, and No Net Production/Capability-sized UPF Alternative, it is indicated that "Water usage for operations would be the same as the No Action Alternative." This does not seem to be true as annual water usage at Y-12 for the three alternatives is significantly less than for the No Action Alternative.

Response: *Section 5.7.7 has been revised to clarify the changes to water usage for Alternatives 2, 4, and 5.*

12. Page 5-79, Table 5.12.2.2-4 Current Fish Advisories: This table is not correct because the reservoirs do not match with the counties as listed. Please correct the information. All the information provided for Melton Hill Reservoir is actually data for Fort Loudon Reservoir, which was not included in this Table. Fort Loudon Reservoir should be included here and the data for Melton Hill Reservoir corrected.

Response: *Table 5.12.2.2-4 has been corrected accordingly.*

2.G.1 MORE DETAILED COMPLEX COMMAND CENTER (CCC) ANALYSIS

Commentors stated that the description of the new facility contains no evaluation or analysis of environmental impacts associated with the CCC despite its 7-acre footprint and siting preference to avoid *Comprehensive Environmental Response, Compensation, and Liability Act* (CERCLA) issues. More thorough environmental analysis should have included consideration of reasonable alternatives such as No Action, alternative locations (outside the security zone v. proximity for emergency response), impact on remediation activities, assessment of vulnerabilities, and complete accounting of costs over the lifetime of the facility. NNSA must show the benefits of the CCC justify the considerable expense of this elective project.

Response: *Section 3.2.2.2 has been modified to provide additional information regarding the CCC, including additional information regarding siting considerations for that facility. Chapter 5 of the SWEIS (sections 5.1–5.16) addresses the impacts of constructing and operating the CCC. Because the CCC would replace existing facilities that house equipment and personnel for the plant shift superintendent, fire department, and emergency operations center, the CCC would not significantly change existing operational impacts (i.e., water use, employment, waste generation, accidents, etc). Construction impacts for the CCC are addressed in Chapter 5. The No Action Alternative is defined in Section 3.2.1. As described in that section, a CCC would not be constructed under the No Action Alternative. With respect to costs, the SWEIS does not address costs. The ROD will discuss the various factors that NNSA considered in its decision-making process, which may include costs.*

2.G.2 INSUFFICIENT COST AND SOCIOECONOMIC ANALYSIS

Commentors stated that distinctions between the No Action Alternative and the Upgrade-in-Place Alternative are unclear. For example, the No Action Alternative includes upgrades and replacement activities already self-approved by NNSA. Commentors further complained that no costs are provided; statements about employment and economic impact are unsupported by real or estimated dollar amounts.

Response: *Section 3.2.1 describes the No Action Alternative, in which NNSA would continue to operate existing enriched uranium (EU) and nonnuclear processing facilities without any major upgrades or changes. However, this does not mean that no changes would occur. As Section 3.2.1 describes, as part of the No Action Alternative, other construction projects are also underway or planned for the future. Some are refurbishments or upgrades to plant systems, such as those for potable water, which have been analyzed in separate NEPA documentation. Section 1.7.2 of the SWEIS identifies and describes these projects in more detail. These projects would happen regardless of any other decisions to be made related to the SWEIS.*

The Upgrade in-Place Alternative is described in Section 3.2.3. As described in that section, the upgrade projects proposed would be internal modifications to the existing facilities and would improve worker health and safety, enable the conversion of legacy special nuclear materials to

long-term storage forms, and marginally extend the life of existing facilities. For continued operations in the existing facilities, major investments will be required for roof replacements; structural upgrades; heating, ventilating, and air conditioning (HVAC) replacements; and fire protection system replacement/upgrades.

The purpose and need for the Y-12 SWEIS is partly driven by a need to operate Y-12 in a cost-effective manner. The SWEIS presents the potential environmental impacts of the reasonable alternatives for the continued operation of Y-12. Costs are not included in the SWEIS but may be considered by NNSA in the ROD process.

2.G.3 INSUFFICIENT DISTINCTION BETWEEN DISMANTLEMENT AND PRODUCTION OPTIONS

One commentor stated that the Draft SWEIS does not distinguish between the equipment "needs" for dismantlement of nuclear weapon secondaries at Y-12 and the equipment needs for production. They are not the same in terms of policy and political impacts.

Response: *The purpose of the SWEIS is to present the potential environmental impacts of the reasonable alternatives for the continued operation of Y-12. NNSA has added a discussion of dismantlement requirements and the dismantlement process to the SWEIS (see Section 2.1.1.1). As that section explains, a facility that would be used specifically for dismantlements would contain essentially the same equipment and have the same inherent capabilities as a facility that would be used for both dismantlements and the assembly of weapons.*

2.G.4 DNFSB RECOMMENDATION 2004-2, ACTIVE CONFINEMENT SYSTEMS, AND DNFSB/TECH-34 IMPLEMENTATION

Commentor requested the following from NNSA:

- To state how DNFSB recommendation 2004-2, Active Confinement Systems, and DNFSB/TECH-34 are being implemented in the UPF.
- List the type of confinement for each Y-12 facility, including proposed facilities, and the plans for upgrading existing buildings to active systems.
- Describe the effects of having or not having these systems on releases.

Response: *The Secretary of Energy's acceptance of the DNFSB Recommendation 2004-2, which was issued on December 7, 2004, obligates DOE facilities to: "disallow reliance on passive confinement systems and require an active confinement ventilation system for all new and existing Hazard Category 2 defense nuclear facilities. With respect to the UPF project, NNSA submitted a response to DNFSB recommendation 2004-2 that indicated a plan for full compliance with that obligation.*

To satisfy Recommendation 2004-2 and TECH-34 expectations, the UPF project ventilation design strategy would apply a "safety-driven active" approach. The general philosophy for the ventilation strategy would provide higher negative pressures as one moved toward areas of greater contamination. The confinement ventilation systems would be filtered and would serve to

protect the in-facility worker, co-located worker, off-site public, and the environment during normal operation as well as certain accident scenarios.

2.I RESCOPING

Commentors requested that this Draft SWEIS be withdrawn and re-scoped given the newly declared long-term national security goal of eliminating nuclear weapons and a new Nuclear Posture Review scheduled to be released March 1, 2010. In addition, the Draft SWEIS should be re-scoped because NNSA has changed the alternatives, NNSA has expanded the range of legal alternatives from three in the 2005 Notice of Intent to five in the present Draft SWEIS.

Response: *As explained in Section 1.1, NNSA did not release the Draft Y-12 SWEIS until the Complex Transformation SPEIS process was completed. Once the ROD for that SPEIS was issued, NNSA considered whether to conduct additional scoping for the SWEIS. Because the Complex Transformation SPEIS ROD affirmed the continued operations at Y-12, as well as the need for a UPF, NNSA decided that the purpose and need of the SWEIS and the proposed action identified in the original NOI had not changed from that which was announced in the Y-12 SWEIS NOI (70 FR 71270). Consequently, NNSA decided that the comments from the original scoping period provided adequate information to: (1) determine the scope of the SWEIS; (2) determine the most important issues to be analyzed; and (3) identify and eliminate from detailed study the issues which are not significant. As a result, NNSA did not conduct additional scoping for the SWEIS.*

NNSA acknowledges that there have been the following minor changes in the SWEIS alternatives compared to what was announced in the NOI: (1) the "run to failure" alternative was eliminated because the Complex Transformation SPEIS ROD had already decided that Y-12 would retain the EU mission; and (2) the Capability-sized UPF Alternative and the No Net Productions Capability-sized UPF Alternative were added to be responsive to further potential reductions in the stockpile.

With regard to any changes in national security requirements, so long as the Nation relies on a nuclear deterrent, there will be a need to maintain the capability to keep nuclear weapons safe and reliable. NNSA has no basis to predict that nuclear weapons will not be a part of this Nation's national security policy over the time period covered in the Y-12 SWEIS. As the only site in the nuclear weapons enterprise that produces secondaries and cases, Y-12 is key to maintaining the safe and reliable stockpile. The SWEIS includes alternatives that could support any reasonably foreseeable stockpile size, which may require the capability to produce 10 secondaries and cases per year (Alternative 5), 80 secondaries and cases per year (Alternative 4), 125 secondaries and cases per year (Alternative 2), and 160 secondaries and cases per year (Alternatives 1 and 3). Because of this range of alternatives, NNSA thinks that any decision based on the SWEIS can be consistent with, and supportive of any reasonably foreseeable future nuclear weapon requirements, and there is no need to delay the SWEIS or conduct additional scoping. The Final SWEIS includes a new discussion of the New START Treaty in Section 1.5.1 and the 2010 NPR in Section 1.5.2.

3.0 PURPOSE AND NEED

3.A GENERAL QUESTION OF NEED; IMMORALITY OF NUCLEAR WEAPONS

Commentors stated there is no need for continued life-extension work or new weapons production. Commentors stated that there is no need for a new uranium bomb plant because the renewal of the START Treaty with Russia will reduce the nuclear warhead stockpile and it will continue to go down. Commentors stated that there is no moral justification, no moral rationale for the acquisition of more nuclear weaponry. Commentors believe that nuclear weapons are immoral, profoundly dangerous, illegal, expensive, and unnecessary. Commentors stated that nuclear weapons are instruments of death and massive destruction, and do not want nuclear bombs made in their backyard. Commentors stated that there is no need for new weapons production and that the United States should focus on dismantling them. Commentors recommend that plans to build a new bomb plant be abandoned. Commentors stated that there is no need for a new bomb plant, nor any need to refurbish old warheads or provide modifications to extend the life of current warheads. Commentors stated it is senseless and irresponsible to spend $3.5 billion on a facility which will not be needed by the time it is completed (2018). The facility will not be needed because the US stockpile of "life extended" warheads will exceed the maximum number allowed by the START Treaty. Commentors stated that building a Capability-Sized UPF when the demand for production capacity is expected to decline to near-zero in the next decade is unacceptably wasteful. Commentors added that there is no reasonable scenario under which a throughput capacity of 50–80 warheads/year would be required to maintain the current stockpile in its present safe, secure and reliable status. Commentors stated that the purpose and need has changed since the UPF was first proposed in 2005, and has continued to seek a new equilibrium since the Draft Y12 SWEIS was published in October 2009. Since the United States has now disavowed new warhead production and significant modifications to the existing stockpile in an effort to demonstrate the seriousness of the US commitment to nonproliferation, there is no need for the UPF80.

Response: *The requirements that NNSA uses to base or define its programmatic needs are established by the current PDDs, NWSP, policies, statutes, and the judgment of NNSA in consultation with the DoD and experts at NNSA's laboratories. The U.S. nuclear weapons stockpile is aging, with some warheads designed and constructed over 40 years ago. To maintain the safety and reliability of this legacy stockpile, NNSA will continue to perform LEPs. As stated in the 2010 NPR, LEPs will use only nuclear components based on previously tested designs, and will not support new military missions or provide for new military capabilities.*

With respect to new weapons, as stated in the 2010 NPR, the U.S. will not develop new nuclear warheads. See also comment response 1.A regarding arms control treaties.

The purpose and need for the proposed action and alternatives addressed in the Y-12 SWEIS is described in Section 1.5 of the SWEIS. The SWEIS examines a range of alternatives that could support a range of nuclear weapons stockpiles including several that represent a substantial reduction from those nuclear weapons contemplated by the Moscow Treaty. The purpose and need for a UPF (including a "UPF80") is addressed in comment-response 3.B. A discussion of

the morality of nuclear weapons and the efficacy of this nation's national security policies is beyond the scope of this SWEIS.

3.B NEED FOR MODERNIZATION AND UPF

Commentors stated that modernized facilities, with cost effective and safety focused processes, are needed for Y-12's role in manufacture and disassembly of nuclear warhead components. Commentors stated that a new UPF is needed for continued protection of the environment, citizens, our nation, and the world. Commentors also indicated that continued development of U.S. capabilities to process uranium and other materials is required to ensure enduring security of the U.S., as well as serve as a deterrent. Commentors stated that the UPF is essential to maintain weapons reliability, fuel nuclear Navy fleet, downblend enriched uranium to support nonproliferation goals, and to accomplish a 90 percent reduction in Y-12's footprint while realizing cost savings. Commentors stated that the current facilities are old, with obsolete technology, and designed to meet requirements that no longer exist. Commentors stated that modernization at Y-12 is imperative and the UPF must be completed, both in the interest of safeguarding security of people that work in and materials that are used in the facilities. Commentors stated that the new facility makes the most sense from an economic, environmental, and safety standpoint, and, from a national security standpoint, is critical to the welfare of the U.S.

Commentors also stated that there is no need to build an "oversized" and "wrongly-missioned" UPF under the "preferred alternative." Commentors stated that NNSA needs to answer why a multi-billion dollar UPF is necessary and why the existing 9212 complex cannot be sufficiently restored and upgraded, and why more floor space cannot be made available in the $700 million Highly Enriched Uranium Materials Facility (HEUMF) for secondary components production. Commentor is concerned that by the time the UPF is constructed in 2018, there will be no need left for the UPF proposed in the Preferred Alternative, or even one of the sizes proposed in the No Net Capability Alternative. Commentor further added that the existing facilities at Y-12 are already being upgraded to meet health, safety, security and environmental standards whether a new UPF is built or not. Commentors stated that the production of secondaries is not needed as there are thousands in storage. Commentors also referenced the JASON report regarding the Life Extension Program, which confirms that there is no need to manufacture additional secondaries. Commentors stated that "critical mission requirements are not the driver behind UPF." Commentors stated that other factors drive modernization, including the need for seismic upgrades, enhanced security, and projected environmental, safety, and health requirements, which are not detailed. Commentors stated that international inspections and verification will be of growing importance; incorporating such needs into the design of any new facilities is prudent and, in the long run, will prove to be cost-effective.

Response: *Section 1.3 of the SWEIS discusses the purpose and need for a UPF. As discussed in that section, a UPF is needed to:*

- *Improve the level of security and safeguards;*
- *Replace/upgrade end-of-life facilities and ensure a reliable EU processing capability to meet the mission of NNSA;*

- *Improve efficiency of operations and reduce operating costs by consolidating and modernizing equipment and operation;*
- *Reduce the size of the protected area by 90 percent and reduce the operational cost necessary to meet the security requirements;*
- *Improve worker protection with an emphasis on incorporating engineered controls; and*
- *Comply with modern building codes and environment, safety, and health (ES&H) standards.*

With respect to whether critical mission requirements are the driver behind UPF, ensuring a reliable EU processing capability to meet the mission of NNSA is one of the needs that a UPF would address. See comment response 1.A for a discussion of the JASON Report and comment response 3.C for the need for secondaries.

With respect to international inspections and verification related to the design of new facilities, the SWEIS presents the potential environmental impacts of constructing and operating any new facilities. Issues related to international inspections and verification are beyond the scope of the SWEIS.

3.C NEED FOR SECONDARIES

Commentors stated that NNSA assumes that every weapon refurbished during a Life Extension Program needs a newly rebuilt secondary. NNSA should specifically answer in the Y-12 SWEIS why rebuilt secondaries are necessary for refurbished US nuclear weapons. It is generally accepted that secondaries are far less complicated and sensitive than plutonium pits, and according to Jason's report plutonium pits last 85 years or more.

Response: *Components and systems requiring rework or replacement are made on a case by case basis based on NNSA's surveillance program. The Quality Evaluation and Surveillance Program is discussed in Section 2.1.1.5. Rebuilt secondaries are typically needed to address changes determined to be necessary by the design laboratories.*

4.0 NO ACTION ALTERNATIVE (ALTERNATIVE 1)

Commentors stated that Alternative 1 (and 5) does not provide long-term capability to execute our necessary mission.

Response: *NNSA notes this comment. Alternative 1 (the No Action Alternative) is discussed in Section 3.2.1. The No Action Alternative would not improve security, safeguards, worker safety, or improve efficiency of operations compared to the action alternatives. Alternative 5 (the No Net Production/Capability-Based Alternative) is discussed in Section 3.2.5.*

5.0 UPF ALTERNATIVE (ALTERNATIVE 2)

Commentors support Alternative 2, the UPF Alternative, including construction of a Complex Command Center. Commentor stated that all of the equipment and processes are needed, regardless of the throughput. Commentor stated that a reduction in size is not feasible as it

creates design problems associated with trying to fit needed processes in the current small footprint. Commentor also stated that design time could have been reduced with a larger building.

Response: *NNSA notes support for the UPF Alternative. As discussed in Section 1.4.6, the Y-12 SWEIS evaluates three alternative capacities for the UPF and NNSA believes that all three capacities are reasonable alternatives for meeting national security requirements. NNSA does not think design time would vary significantly among the capacity alternatives.*

6.0 UPGRADE IN-PLACE ALTERNATIVE (ALTERNATIVE 3)

Commentors stated that Alternative 3 will not solve the underlying issues with existing facilities.

Response: *NNSA notes this comment. Alternative 3 (the Upgrade in-Place Alternative) is discussed in Section 3.2.3. The Upgrade in-Place Alternative would upgrade the existing EU and nonnuclear processing facilities to contemporary environmental, safety, and security standards to the extent possible within the limitations of the existing structures and without prolonged interruptions of manufacturing operations.*

7.0 CAPABILITY-SIZED UPF ALTERNATIVE (ALTERNATIVE 4)

Commentors support Alternative 4, the Capability-sized UPF Alternative by stating that this option will lead to modernization of existing facilities, improved security posture for special nuclear materials, improved health and safety protection for workers, and better cost effectiveness. Commentor stated that this alternative will be the best option for America's defense and maintenance of its status in world politics and the most sensible stockpile reduction is supported by this option. Commentors support Alternative 4 based on the need to maintain capability, expertise and capacity to maintain a nuclear deterrent. Commentors stated that the problem with Alternative 4 is that there is no room for growth and performance of multiple missions, with work for others missions already having to wait.

Response: *NNSA notes support for the Capability-sized UPF Alternative. As discussed in Section 1.4.6, the Y-12 SWEIS evaluates three alternative capacities for the UPF and NNSA believes that all three capacities are reasonable alternatives for meeting national security requirements. NNSA thinks that Alternative 4 would be reasonably flexible to meet any required missions.*

7.A CAPACITY QUESTIONS

The warhead production capacity of the preferred alternative is 50/80 warheads per year, and no explanation is given for this apparently arbitrary capacity. Commentor questioned whether it is a coincidence that the production capacity of the preferred alternative matches the capacity of the Chemistry and Metallurgical Research Replacement–Nuclear Facility (CMRR-NF) at Los Alamos National Laboratory. Please explain the purpose and need for each of the alternative's capacities. Another commentor stated that the distinction between the UPF80 and UPF5 is not clear. The description suggests the two alternatives have identical floor space and equipment. If

there is a real capacity difference between UPF80 and UPF5 then it should be explained, because the proliferation implications are large. Commentor stated that the UPF80 expands U.S. warhead production capacity.

Response: *The "UPF80," which is the commentor's shorthand identification of Alternative 4, is described in Section 3.2.4. The "UPF5", which is the commentor's shorthand identification of Alternative 5, is described in Section 3.2.5. Tables 3.2.4-1 and 3.2.5-1 provide quantitative information regarding the operational differences between these two alternatives and the No Action Alternative. Additionally, Section 1.4.6 describes and distinguishes the UPF capacity alternatives, and Table 1.4.6-1 presents the operational differences among the UPF alternatives. As explained in Section 1.4.6, UPF80 and UPF5 would each be approximately 350,000 square feet in size. The production capacity of the preferred alternative has been changed from approximately 50-80 secondaries and cases per year to approximately 80 secondaries and cases per year. This change is consistent with NNSA planning requirements stated in Annex D of the FY 2011 Biennial Plan and Budget Assessment on the Modernization and Refurbishment of the Nuclear Security Complex (NNSA 2010). The capacity requirements of the CMRR-NF are beyond the scope of the Y-12 SWEIS.*

Proliferation implications of the alternatives are beyond the scope of the SWEIS, which presents the potential environmental impacts associated with the alternatives. The ROD will explain all factors that NNSA considered in making its decisions regarding the SWEIS, which may include proliferation concerns. NNSA disagrees that "the UPF80 expands US warhead production capacity." As stated in Section 1.4.1, "the No Action Alternative would be capable of supporting a baseline throughput of approximately 160 secondaries and cases per year." As such, the UPF80 would actually reduce capacity compared to the existing capacity.

7.B PREFERRED ALTERNATIVE AND PROLIFERATION

Commentor stated that 4 of the 5 alternatives that NNSA has determined as "reasonable" maintain capability of producing at least 80 warheads per year, consistent with planned construction of a plutonium pit facility at LANL with a 50/80 warhead per year capacity, which in combination is a provocative act. Commentors stated that the physical distinction between the UPF80 and the UPF5 is not clear in the SWEIS, and if there is a real capacity difference between the UPF80 and the UPF5, the SWEIS should clarify because the proliferation implications are large. The UPF5 is more supportive of U.S. nonproliferation goals. Another commentor stated that the 50/80 capacity has no relationship to stockpile surveillance, stockpile stewardship, stockpile maintenance or Life Extension requirements, but instead reflects a commitment by the United States to reconstitute production capacity for new nuclear warheads.

Response: *The rationale for Alternative 4, the Capability-sized UPF Alternative (which commentor identifies as the "UPF80"), is contained in Section 1.4.4 of the SWEIS. As stated in that section, "Although the size of the stockpile beyond 2012 is not known, the trend suggests a significantly smaller one. Consistent with this trend, NNSA developed an alternative, referred to as the "Capability-Based Alternative" in the Complex Transformation SPEIS, to analyze the potential environmental impacts associated with operations at Y-12 that would support stockpiles smaller than those currently planned. NNSA has assumed that such a stockpile would*

be approximately 1,000 operationally deployed strategic nuclear warheads. This assumption is consistent with the Complex Transformation SPEIS Capability-Based Alternative (NNSA 2008). In addition, analysis of this alternative enhanced NNSA's understanding of the infrastructure that might be appropriate if the U.S. continues to reduce stockpile levels."

Regarding the physical distinctions among the UPF alternatives, this issue is addressed in Section 1.4.6 of the SWEIS. As explained in that section, although the smaller, capability-sized UPFs could be physically smaller than the nominal-sized UPF, an assessment conducted by the UPF Project team at the request of the Nuclear Weapons Council Integrating Committee in early 2008 identified only 15 pieces of duplicate equipment that could be eliminated by reducing capacity requirements. In terms of square footage of the facility constructed, there would only be a reduction of approximately 38,000 square feet compared to the approximately 388,000 square feet proposed for the nominal-sized UPF described under Alternative 2. Consequently, the capability-sized UPFs described under Alternative 4 and Alternative 5 would not be significantly smaller than the UPF described under Alternative 2. From a square footage standpoint, any "capability"-sized UPF requires a "minimum" of 350,000 square feet to accommodate production equipment/glove boxes. As such, construction requirements for the three UPF capacity alternatives would not vary significantly among the alternatives.

NNSA disagrees that Alternative 4 reflects "a commitment to reconstitute in total production capacity for new nuclear warheads." In fact, the UPF80 would actually reduce capacity compared to the existing capacity. Additionally, the 2010 NPR states that, "The United States will not develop new nuclear warheads." See also comment response 7.A.

7.C SPACE REQUIREMENTS

Commentors stated that the SWEIS does not adequately provide information to support the square footage requirements asserted for the space in the preferred alternative. A much more detailed and thorough description of space requirements for each stated purpose of the project, future purposes, and other information relevant to analyzing the adequacy of the size and scale of the facility proposed in the preferred alternative is required by law.

Response: *The size and space utilization of the UPF is based on the NNSA direction to include all activities to support LEPs, uranium casting and processing, machining, dismantlement, disassembly, and assembly. A minimal amount of space is reserved for technology development and maturation. Each UPF alternative includes the capability to perform these activities, although at different capacities, as described in Sections 3.2.2, 3.2.4, and 3.2.5 of the SWEIS. A detailed space allocation is not a requirement of NEPA. The potential environmental impacts associated with the UPF alternatives are based on the best available design information. NEPA analysis is performed during the planning stage of a project with detail design to be performed at a later date.*

8.0 NO NET PRODUCTION/CAPABILITY-SIZED ALTERNATIVE (ALTERNATIVE 5)

Commentors stated that Alternative 5 does not provide long-term capability to execute our necessary mission. Commentors stated that Alternative 5 is preferable to Alternatives 1 through 4, but questions why existing, problematic secondaries wouldn't be taken offline and dismantled. Commentor is opposed to Alternative 5, No Net Production/Capability-sized UPF Alternative.

Response: *NNSA notes this comment. Alternative 5 (the No Net Production/Capability-sized UPF Alternative) is discussed in Section 3.2.5.*

8.A RATIONALE FOR SELECTING PREFERRED ALTERNATIVE

Commentor stated that an additional alternative of "5 warheads per year" represents the actual manufacturing capacity required to keep the arsenal safe and secure, and has been determined to be reasonable by NNSA. Commentor also stated that findings of the JASON committee indicate that a $3.5 billion investment in the UPF for new warhead capacity is not warranted. Another commentor stated that there is no distinguishing benefit of the "UPF80" over the "UPF5," but the distinctive difference is that the UPF80 reconstitutes full-scale nuclear warhead production capacity, undermines President's commitment to demonstrate global leadership in disarmament efforts and U.S. nonproliferation goals.

Response: *Section 3.6 of the SWEIS discusses the rationale for the preferred alternative. That section does not discuss why other alternatives were not identified as "preferred." However, NNSA agrees with the commentor that the benefits of Alternative 4 would also apply to other UPF alternatives (e.g., Alternatives 2 and 5). NNSA decided that Alternative 4 was preferred over Alternatives 2 and 5 because it represented the best capacity for meeting current and reasonably foreseeable national security requirements. NNSA disagrees that Alternative 4 is "unnecessarily provocative." Alternative 4 would actually reduce the capacity at Y-12 compared to the existing capacity. NNSA disagrees that the findings of the JASON committee indicate that a $3.5 billion investment in the UPF for new warhead capacity is not warranted. NNSA finds no such conclusion in that report. Moreover, the 2010 NPR specifically concludes that a UPF is a key investment required to sustain a safe, secure, and effective nuclear arsenal. The 2010 NPR conclusion is equally applicable to all the UPF capacity alternatives.*

9.0 OTHER ALTERNATIVES THAT SHOULD HAVE BEEN CONSIDERED

Commentors stated that any SWEIS about nuclear weapons (or nuclear power) must acknowledge that the technology is harmful to people and the environment, with no mitigation of the unsolvable environmental problems associated with the nuclear fuel cycle. Commentors also said that the SWEIS should recommend the alternative that utilizes no new nuclear material.

Response: *The purpose of the SWEIS is to analyze the potential environmental impacts of the reasonable alternatives for the continued operation of Y-12. Chapter 5 analyzes the potential impacts to human health and the environment. The "nuclear fuel cycle" typically refers to the*

civilian use of nuclear power, which is beyond the scope of the Y-12 SWEIS. With respect to "an alternative that utilizes no new nuclear material," none of the alternatives in the SWEIS would require the production of any new nuclear materials.

9.A CURATORSHIP ALTERNATIVE, "6TH ALTERNATIVE"

Commentors stated that there is a need for "passive curatorship" of the current arsenal which can be achieved through consolidation, downsizing, and upgrading-in-place the current facility. More specifically, commentors stated that a sixth alternative should be added to the SWEIS and considered by NNSA. "Alternative 6" would recognize a need for a Stockpile Stewardship mission that can be achieved through an upgrade in place to existing facilities. It would recognize the increasing demand for a verifiable safeguarded dismantlement capacity which must be addressed. And if there is a need, [NNSA] can construct a new dismantlement facility with designed-in safeguards and transparency to process the current backlog and accommodate increased retirement of warheads and the eventual dismantlement of the entire U.S. arsenal. The benefits of such an alternative include workforce retention and the reduction of the high-security area. One commentor stated that the dismantlement option is already embodied in UPF. Commentors prefer Alternative 6, which would upgrade existing facilities at a cost, according to commentors, of only $100 million and would not involve actual bomb making in Oak Ridge. Commentors added that they do not believe "life extended" warheads are needed for the stockpile. Alternative 6 provides a win/win for the local workforce and regional economy. Reduction of the high security footprint (associated with Alternative 6) should permit acceleration of demolition and cleanup projects at Y-12 which are currently hampered by security concerns. Further, according to commentors, an aggressive effort by local leaders to secure funding for cleanup could offset losses in the security sector and minimize the regional economic impact. Commentors stated that a curatorship approach would result in the following programmatic advantages compared to the existing Stockpile Stewardship Program:

1. Allow NNSA to de-emphasize nuclear weapons science and technology and cease its quest for more detailed simulations of exploding thermonuclear weapons.

2. Reduce weapons Research and Development (R & D).

3. Recurring annual assessments or certification of the safety and reliability of the stockpile should not be necessary.

4. Offer improved safety, improved security, improved environmental systems, reduce operating costs, and would strengthen nonproliferation efforts.

5. Reduce operating costs because there would be less R&D and nonproliferation would be strengthened because curatorship would more closely align with the NPT.

Commentors stated that consolidating operations and upgrading in-place would render facilities functional for at least another decade, during which the future of U.S. nuclear force needs would become clearer. Commentors stated that "the currently operating production facilities can be upgraded to standards protective of worker and public health and safety as well as protective of

nuclear materials themselves for $100 million (NNSA's estimate) — a dramatic savings over the estimated $3.5 billion cost of the UPF."

Response: *NNSA believes that many of the elements of a curatorship approach that involve the proposed actions at Y-12 are analyzed in the SWEIS. For example, the SWEIS currently includes an alternative (Alternative 3, Upgrade in-Place) that would accomplish all required dismantlements (and any required assembly) in existing facilities that would be upgraded. As such, the SWEIS already includes an alternative that recognizes "a need for a Stockpile Stewardship mission that can be achieved through an upgrade in-place to existing facilities." With respect to costs associated with the alternatives, see comment-response 10.C. While NNSA agrees that consolidating operations and upgrading in-place could render facilities functional for at least another decade, during which the future of U.S. nuclear force needs could become clearer, NNSA notes that the recently completed NPR specifically concludes that a UPF is a key investment required to sustain a safe, secure, and effective nuclear arsenal (see comment-response 1.A).*

The SWEIS also includes an alternative that would provide the minimum assembly/disassembly capacity which NNSA believes would meet national security requirements. Under this alternative (Alternative 5 – No Net Production/Capability-sized UPF Alternative), NNSA would maintain the capability to conduct surveillance and produce and dismantle secondaries and cases. NNSA would reduce the baseline capacity to approximately 10 secondaries and cases per year, which would support surveillance operations and a limited LEP workload; however, this alternative would not support adding new types or increased numbers of secondaries to the stockpile.

NNSA has added a discussion of the curatorship alternative proposed by commentors to Section 3.4 of the SWEIS. Although there are elements of the curatorship approach in the SWEIS alternatives, NNSA believes that the curatorship alternative would be unreasonable, as explained in Section 3.4.

NNSA has also added a discussion of dismantlement requirements and the dismantlement process to the SWEIS (see Section 2.1.1.1). As that section explains, a facility that would be used specifically for dismantlements would contain essentially the same equipment and have the same inherent capabilities as a facility that would be used for both dismantlements and assembly of weapons. In that sense, NNSA agrees that the dismantlement option is already embedded in all alternatives. With respect to the construction of a new facility for dismantlements only, please see comment response 9.B below.

The advantages/disadvantages of a broader curatorship approach across the entire nuclear security enterprise versus NNSA's Stockpile Stewardship Program are beyond the scope of the SWEIS. The commentor is directed to the Stockpile Stewardship PEIS (DOE/EIS-0236) and the Complex Transformation SPEIS (DOE/EIS-0236-S4), both of which addressed the curatorship approach.

9.B DISMANTLEMENT FACILITY ONLY

Commentors stated that Y-12 should be committed to dismantlement of nuclear weapons, because there is currently a 15-year backlog of retired weapons awaiting dismantlement, and more to come. Commentors proposed construction of a new, single purpose Dedicated Dismantlement Facility (DDF), equipped only with machines and equipment necessary for dismantlement. Production capacity for the purpose of stockpile surveillance and maintenance can be accomplished at a 5 warhead/year throughput capacity within an existing facility, possibly Building 9212. The high security footprint could be reduced by as much as 60 percent, the new dismantlement facility could be designed and built for the less than the UPF, and would provide the most efficient, effective technology for dismantlement and safe working conditions for the workforce for a 50–60 year lifespan. Commentors stated that the Y-12 facility should be dismantling nuclear weapons in negotiated verifiable steps with other nuclear weapons countries. The Dismantlement program in the SWEIS should be central to its analyses under all alternatives. Construction of a new Dedicated Dismantlement Facility along with ES&H upgrades to existing facilities would preserve construction jobs and maximize job security for operational workforces—an increase in dismantlement jobs might be expected to mitigate the impact of any job losses experienced due to the inevitable reduction in Y12's production mission.

Commentors stated that the future of Y12 is in dismantling tens of thousands of nuclear weapons. Because this part of Y12's mission has been largely neglected for decades, there is a 12-15 year backlog of retired secondaries and subassemblies awaiting dismantlement and disposition. The backlog is large enough to create storage issues and, on more than one occasion, criticality safety violations.

Response: *A "dismantlement-only" alternative was not analyzed because it would not meet NNSA's purpose and need for action and is not within the national security missions assigned to NNSA by the NNSA Act (50 United States Code [USC] 2401, et. seq.). That act also mandates that NNSA promote international nuclear safety and nonproliferation. NNSA vigorously pursues its nonproliferation mission; the scope of the Y-12 SWEIS is reflective of NNSA's mission to produce, maintain and enhance the safety, reliability, and performance of the United States nuclear weapons stockpile in order to meet national security requirements.*

The requirements that NNSA uses to base or define its programmatic needs are a combination of the current PDDs, NWSP, policies, and statutes, as well as the best judgment of NNSA in consultation with the DoD and experts from NNSA's national laboratories. Using this information, NNSA makes reasonable assumptions as to the configuration and capacity for the nuclear security enterprise.

NNSA has, however, included an analysis of a "No Net Production/Capability-Based Alternative" to the SWEIS (see Section 3.2.5 of the SWEIS). As described in that Section, under the No Net Production/Capability-Based Alternative, NNSA would maintain the capability to produce a limited number of components and to assemble/re-assemble weapons for the legacy stockpile. This alternative would also include the capability with sufficient capacity for

continued surveillance, limited life component (LLC) production, and weapon (and component) dismantlement.

Section 2.1.1.1 of the SWEIS discusses dismantlements at Y-12. Figure 2-3 depicts the dismantlement throughput at Y-12 over the past 8 years. Although the specific dismatlement numbers are classified, as shown in that figure, dismantlements have increased significantly over the past four years. NNSA continues to meet its national security requirements related to dismantlements. NNSA disagrees that dismantlement backlogs have created storage and safety issues.

9.C ALTERNATIVES UNDERMINE PRESIDENT'S POLICIES

Commentors stated that the SWEIS doesn't include any alternative that supports and that's consistent with the President's foreign policy but, indeed, would undermine it. Construction of a $3.5 billion warhead production facility when the U.S. is attempting to regain its stature as an international leader in nonproliferation efforts, assuage concerns of non-nuclear weapons states on the eve of the NPT Review, and dissuade Iran from further developing its nuclear capability is not reasonable or rational. As a nation the U.S. must take concrete steps towards disarmament in order for others to trust and follow. Commentors stated that further proliferation of nuclear warheads undermines the START treaty.

Response: *Nuclear weapons policy is decided by the President and the Congress. Neither NNSA nor DoD decides the role of nuclear weapons in national policy. NNSA is part of the executive branch of the government and the SWEIS is consistent with and supportive of the President's foreign policy. NNSA's role in the nuclear weapons program is to carry out its statutory mission, which includes maintaining weapons capability and ensuring the safety and reliability of the stockpile. DoD is responsible for deployment and, if necessary, use of nuclear weapons.*

9.D DISMANTLEMENT SHOULD HAVE BEEN DISCUSSED IN SWEIS

Commentors stated that the proposals for a UPF, whatever size, fail to address the growing need for dismantlement capacity, especially considering recent arms reduction agreements. There is no discussion of the overlap of dismantlement and production operations. There is no discussion of the backlog of secondaries awaiting dismantlement which already present a problem for Y-12. This critical mission need for the United States is absent in the SWEIS. The Y-12 SWEIS pays little attention to dismantlement operations, treating them as an adjunct to the production mission of the UPF. Commentors states that the UPF mission should be redirected to dismantlement of secondaries and downblending of weapons-grade highly enriched uranium (HEU) at Y-12. Reports from Y-12 indicate storage capacity issues for secondaries and cases continue to grow.

Response: *In response to these comments, NNSA has added a discussion of dismantlement requirements and the dismantlement process to the SWEIS (see Section 2.1.1.1). As that section explains, a facility that would be used specifically for dismantlements would contain essentially the same equipment and have the same inherent capabilities as a facility that would be used for both dismantlements and assembly of weapons. The Draft SWEIS states that disassembly is a*

mission for all alternatives (see Sections 1.4.1 through 1.4.5). See also comment-response 1.B for a discussion of the nuclear weapon requirements that NNSA and Y-12 must meet.

9.E HEU DOWNBLEND ALTERNATIVE

Commentor proposed an alternative which requires NNSA to design an aggressive plan for downblending approximately 300 metric tons of HEU stored at Y-12. Commentor stated that rather than being stored at the new HEUMF, the material could be declared excess and downblended. Commentor identified the benefits of this proposal as: eliminating the need for multi-billion dollar UPF; reduced cost of storing unneeded weapons-grade materials while creating revenue-generating LEU; reduced security risk associated with HEU storage. Commentor also stated that downblending HEU would free up enough space at HEUMF to accommodate the limited R&D and manufacturing functions planned for the UPF.

Response: *The HEU downblend program is an ongoing activity at Y-12 and NNSA does not have any proposals that would change the program. Consequently, down-blending HEU would continue under all alternatives, and the environmental impacts would be the same for all alternatives. A brief discussion of the HEU downblend program follows.*

HEU is stored at Y-12 in the HEUMF. The exact inventory of HEU at Y-12 is classified. NNSA is responsible for disposing of HEU that has been declared surplus to defense needs primarily by converting it into low enriched uranium (LEU). Once down-blended, the material can no longer be used for nuclear weapons. To the extent practical, NNSA seeks to recover the economic value of the material by using the resulting LEU as nuclear reactor fuel. As part of this program, NNSA has also secured HEU from Russia for down-blending. From 1995 through late 2009, 375 metric tons of HEU from Russian nuclear warheads have been recycled into LEU fuel for U.S. nuclear power plants. This program has eliminated the equivalent of 15,000 nuclear warheads. The Megatons to Megawatts government-to-government program goal of elimination 500 metric tons of warhead material is scheduled to be completed in 2013. Currently, ten percent of U.S. electricity is produced using this fuel. Further surplus declarations are beyond the scope of the SWEIS.

9.F USE OF HEUMF FOR EU OPERATIONS

Commentors stated that another reasonable alternative is the possibility of moving small-scale uranium processing activities, or a portion of thereof, into the existing HEUMF. The Draft SWEIS goes into great detail to describe the rationale for placing the UPF in close proximity to the HEUMF, thus it is reasonable to examine the impacts of downsizing, re-missioning to dismantlement (as opposed to production) and constructing it into the existing building.

Response: *The HEUMF, which has a facility footprint of 110,000 square feet, was designed specifically as a storage facility, including ventilation, fire suppression and safety systems that are adequate for storage but not for processing. The HEUMF will be at 60-70% of capacity by September 2011. Excess capacity that could be used for processing, if feasible, is not expected based on a number of plausible storage/stockpile scenarios. In contrast, the UPF would have a minimum facility footprint of approximately 350,000 square feet and is being specifically*

designed as a processing facility to meet NNSA mission requirements for naval reactors, life extension programs, dismantlement, surveillance, nonproliferation, foreign and domestic research reactor customers, etc. As a result, the HEUMF is not a reasonable alternative for the EU mission.

10.0 COST AND SCHEDULE

10.A COST EFFECTIVENESS OF EXISTING NUCLEAR SECURITY ENTRPRISE

Commentors stated that production activities compete for resources with dismantlement, disassembly, disposition, technology development, environmental restoration, and other programs.

Response: *The United States' policy on nuclear weapons and the budget necessary to support the stockpile is set by the President and the Congress. Modernization of Y-12 reflects NNSA's vision for the most effective means of fulfilling the missions assigned to it by the Congress and the President. Decisions on the prioritization of federal expenditures are beyond the scope of the SWEIS.*

10.B BETTER USE OF RESOURCES

Commentors stated that money could be better spent on other social and national purposes. Several commentors provided examples of better uses of money such as rebuilding and improving the nation's infrastructure, education, childcare, housing, healthcare, and feeding the homeless. Commentors believe that putting $3.5 billion into a nuclear weapons plant is outrageous in light of the Nation's deep deficits.

Response: *The budget necessary to support the stockpile is set by the President and the Congress. Decisions on the prioritization of federal expenditures are beyond the scope of the SWEIS.*

10.C COSTS OF ALTERNATIVES

Commentors stated that although the SWEIS makes claims of cost savings through efficiencies, workforce and footprint reduction, the legitimate cost estimates of the five alternatives are not presented in the SWEIS. Commentors believe that cost estimates are needed to allow a comparison of costs and benefits associated with each alternative. Commentors added that it is irresponsible to spend billions on a bomb plant which, by the time it is completed in 2018, should no longer be needed due to forecasted weapons reductions. A commentator stated that according to recent GAO Report "Actions Needed to Develop High-Quality Cost Estimates for Construction and Environmental Cleanup Projects," NNSA did not meet the standards for credibility and used improper estimations for the "foundation for the cost estimate" for the facility that was submitted to Congress. Commentor added that beyond the costs associated with the UPF, the SWEIS fails to analyze other site plans, including the costs of maintaining current facilities at Y-12 in a "ready-to-use" state as proposed in the "preferred alternative."

Commentors stated that a cost comparison should be made between consolidation in-place with upgrades versus new construction. Commentors stated that job reductions due to innovations in robotics and automated manufacturing processes should be considered.

Response: *The purpose and need for the Y-12 SWEIS is partly driven by a need to operate Y-12 in a cost-effective manner. As discussed in Section 1.3, a UPF would improve the efficiency of operations and reduce operating costs by consolidating and modernizing equipment and operations. The SWEIS presents the potential environmental impacts of the reasonable alternatives for the continued operation of Y-12. Costs are not required to be included in an EIS. However, costs may be considered by NNSA decisionmakers in the ROD process. With respect to job reductions due to innovations in robotics and automated manufacturing processes, the SWEIS includes an analysis of jobs associated with each of the alternatives in Section 5.10.*

10.D TAXPAYER MONEY

Commentors are opposed to the use of taxpayers' money and resources on nuclear weapons. Commentors stated that building a new nuclear facility will be a waste of taxpayers' money because it would become largely automated and several jobs would be lost.

Response: *The budget necessary to support the stockpile is set by the President and the Congress. Modernization of Y-12 reflects NNSA's vision for the most effective means of fulfilling the missions assigned to it by the Congress and the President. Decisions on the prioritization of federal expenditures are beyond the scope of the SWEIS.*

11.0 SECURITY ISSUES, SABOTAGE, AND TERRORISM

11.A SABOTAGE AND TERRORISM – GENERAL

Some commentors expressed concern over potential terrorist attacks at Oak Ridge. One commentator stated that co-location of HEUMF with UPF will enhance the security as there will be reduced shipments of HEU transported cross country. Another commentor stated that the reduction of an overall security footprint should result in higher security whether achieved through a new facility or a consolidation/upgrade-in-place scenario.

Response: *NNSA devotes considerable resources to understanding and preventing terrorism in the nuclear security enterprise. DOE Order 470.4 describes activities conducted under the Safeguards and Security Program aimed at preventing unauthorized access, theft, diversion or sabotage (including unauthorized detonation or destruction) of nuclear weapons, nuclear weapons components, and special nuclear materials. In accordance with the requirements set forth in this Order, NNSA conducts vulnerability assessments and risk analyses to evaluate the effectiveness of existing safeguards in reducing the likelihood of terrorist acts being successful and assisting in the development of new safeguards to further reduce these risks.*

Regarding a terrorist threat, security and potential acts of sabotage are integral considerations in the designs and operating procedures for NNSA sites, including Y-12. These designs and operating procedures protect against attacks by outsiders and sabotage by disgruntled

employees or other insiders. New facilities such as the HEUMF and UPF would provide a greater degree of security than existing facilities.

11.D CLASSIFIED APPENDIX

Commentors stated that in order for interested stakeholders to properly review the safety and security of the new UPF and the significant changes and reduction to the high-security area and overall security that the project proposes, the SWEIS must disclose enough information to the public to enable interested stakeholders to review the information instead of including all the information in a classified appendix that is not available to the public. Commentors believe that it is neither appropriate nor legally adequate to include a classified appendix without carefully analyzing what information can and should be disclosed in the body of the SWEIS. For example, an analysis of the risks to workers and nearby populations in the event of a terrorist attack can be accomplished without revealing specific security vulnerabilities.

Response: *As discussed in Section 5.14.4, NNSA has prepared a classified appendix to this SWEIS that evaluates the potential impacts of malevolent, terrorist, or intentional destructive acts. However, substantive details of terrorist attack scenarios, security countermeasures, and potential impacts are not released to the public because disclosure of this information could be exploited by terrorists to plan attacks. The decisionmaker will consider the results of the classified appendix in the ROD process.*

12.0 RESOURCES

12.B SITE INFRASTRUCTURE

Commentators stated that reducing the footprint and capacity of the Y-12 facility is required.

Response: *All of the action alternatives would, to various degrees, reduce the footprint of the site, consolidate operations, and reduce infrastructure requirements. The Upgrade in-Place Alternative would produce the smallest reduction, while the No Net Production/Capability-sized UPF Alternative would produce the largest reduction.*

12.C AIR QUALITY

Commentor suggested that DOE consider the use of diesel retrofit technologies, such as diesel oxidation catalysts, to reduce air quality impacts of diesel-powered equipment during the construction phase. The FEIS should clarify the expected timeline of construction. Commentor suggested common actions to reduce exposure to diesel exhaust. Such actions include low-sulfur diesel, retrofit engines, position of exhaust pipe, catalytic converters, ventilation, climate-controlled cabs, regular engine maintenance, respirators, turning off engine when not in use.

Response: *NNSA agrees that site-specific measures can be implemented to reduce the air quality impacts of diesel-powered equipment. As explained in Sections 5.6.1.8 and 5.6.1.9, NNSA has instituted many "green measures" that are expected to reduce air emissions. For diesel engines, NNSA has significantly increased the use of bio-diesel fuel, which, when compared to traditional*

diesel-powered vehicles, have overall reduced tail pipe emissions (carbon monoxide, ozone-forming compounds, nitrogen oxides, sulfates, and particulates). NNSA will consider further measures, such as those advocated by the commentor, to reduce the air quality impacts from diesel equipment. With respect to the expected timeline of construction, Chapter 3 of the SWEIS identifies the construction period for each of the alternatives.

12.D WATER RESOURCES

A commentor discussed the negative impacts Y-12 operations have had on the East Fork Poplar Creek. This commentor stated that 70 kilograms of uranium was released to the offsite environment through liquid effluent in 2007. In addition, the commentor stated that NNSA has appealed for relief from water permits, and that mercury releases at Station 17 exceeds Tennessee Water Quality Criteria 75 percent of the time. Commentors suggested that the effects on water quality be analyzed for all foreseeable D&D projects at Y-12 because D&D activities and new construction has the potential to add uranium and mercury contamination to already existing contamination. A commentator stated that NPDES discharges from the Y-12 facility require ongoing monitoring and that the Final EIS should include updated information regarding NPDES monitoring. Commentor stated that evaluation of potential water withdrawal impacts to the Clinch River during droughts should be evaluated in the FEIS. Commentators stated that groundwater contamination still exists in the region surrounding Y-12 Plant.

Response: *With regard to existing groundwater contamination, Section 4.7.1 describes the existing groundwater contamination at Y-12. As shown in Table 4.7.2-1, Y-12 released 70 kg of uranium in 2007. This release was less than releases in 2003, 2004, 2005, and 2006, and the resultant impacts from this release were well below derived concentration guidelines. The SWEIS includes an assessment of impacts from releases for all alternatives in Section 5.7.*

The SWEIS assesses the potential impacts of D&D in Section 5.16 using the best available information. Additionally, Chapter 6 includes the impacts of the IFDP in the cumulative impacts analysis to the extent that these impacts can be quantified.

The information in Section 4.7.2 related to NPDES monitoring is based on data contained in the Oak Ridge Reservation Annual Site Environmental Report for 2007. NNSA has added information to Section 5.7.1.2 regarding the withdrawal of water from the Clinch River, including information related to withdrawals during droughts.

12.E GEOLOGY AND SOILS

Commentors stated that the Draft SWEIS contains an inadequate assessment of seismic concerns surrounding current and future buildings. Other commentors expressed concern about potential earthquakes at Y-12.

Response: *Seismology is addressed in Sections 4.5.3 and 5.5. As discussed in those sections, Y-12 lies at the boundary between seismic Zones 1 and 2, indicating that minor to moderate damage could typically be expected from an earthquake. Y-12 is traversed by many inactive faults formed during the late Paleozoic Era. There is no evidence of capable faults (surface*

movement within the past 35,000 years or movement of a recurring nature within the past 500,000 years) in the immediate area of Y-12, as defined by the Nuclear Regulatory Commission's (NRC's) "Reactor Site Criteria" (10 Code of Federal Regulations [CFR] Part 100). The nearest capable faults are approximately 300 miles west of Y-12 in the New Madrid Fault zone. Based on the seismic history of the area, a moderate seismic risk exists at Y-12. However, this should not negatively impact the construction and operation of facilities at Y-12. All new facilities and building expansions would be designed to withstand the maximum expected earthquake-generated ground acceleration in accordance with DOE Order 420.1B, Facility Safety, and accompanying safety guidelines. The SWEIS considers potential impacts that could be caused by earthquakes (see Sections 5.14 and Section D.9). In general, the accidents analyzed in detail for the SWEIS bound any impacts that would be associated with earthquakes.

12.F BIOLOGY

EPA defers to the FWS regarding endangered species assessments, and encourages the DOE to continue coordination with the FWS as appropriate. Commentor stated that a study found that animals (deer) living near Y-12 tested radioactive and were unfit for consumption. Commentor also stated that animals contaminated on Y-12 spread their contamination beyond the perimeter of the facility, causing illness and death. Commentor stated that streams have also been poisoned by dumping of mercury, making fish unfit for human consumption.

Response: *NNSA notes the EPA comment and will continue to coordinate with the USFWS regarding endangered species. Regarding contamination that has affected animals and fish, Section 4.8.4 discusses the biological monitoring and abatement programs at ORR. More details regarding the biological monitoring and abatement programs at ORR are also found in the Annual Site Environmental Reports. With respect to deer, in the 2008 hunts, 483 deer were harvested on the ORR, and 7 (1.45%) were retained for exceeding the administrative release limits or beta-particle activity in bone. With respect to fish, although waterborne mercury concentrations in the upper reaches of East Fork Poplar Creek decreased substantially following the 2005 start-up of a treatment system on a mercury-contaminated spring, mercury concentrations in fish have not yet decreased in response. Fish communities were monitored in the spring and fall of 2008 at five sites along East Fork Poplar Creek and at a reference stream. Over the past two decades, overall species richness, density, and the number of pollution-sensitive fish species have increased at all sampling locations below Lake Reality. However, the East Fork Poplar Creek fish community continues to lag behind reference stream communities in most important metrics of fish diversity and community structure (DOE 2009b). Fish advisories are presented in Table 5.12.2.2-4. Water quality is addressed in Section 4.7.2 of the SWEIS. See comment-responses 12.T through 12.T.29 for comments and responses related to the Wetlands Assessment.*

12.G CULTURAL RESOURCES

Commentor stated that coordination with the SHPO should be ongoing, and documented as the project progresses. The DEIS states that the evaluation and cultural resource recovery would be guided by plans and protocols approved by the SHPO in consultation with Native American tribes. The FEIS should include updated information regarding these coordination activities. If

suspected cultural artifacts are encountered during the construction process, all construction activities should cease and the situation should be addressed in consultation with the SHPO.

Response: *Section 5.9 presents the potential impacts to cultural resources for the alternatives. That section has been updated with the latest information available. As that section explains, should suspected cultural artifacts be encountered during the construction process, all construction activities would cease and the situation would be resolved via consultation with the SHPO. Appendix C contains consultation letters pertaining to cultural resources.*

12.G.1 PRESERVE WORLD WAR II ERA BUILDINGS

Commentors stated that the EIS process should include thorough study of cultural resources, including a commitment to which public resources will be preserved in accordance with the National Historic Preservation Act. Commentors also stated that the SWEIS should discuss how Y-12 will offset the loss of the more than 200 buildings that have been demolished, and the many others scheduled for demolition, many of which are/were eligible for listing in the National Register of Historic Places. Commentors support the plan proposed by Oak Ridge Historian Bill Wilcox to save just three WWII-era buildings that are eligible for NRHP listing: Beta-3 and the calutrons (9204-3), 9731—the original pilot plant, and 9706-2—the original medical building and best example of Y-12's Corps of Engineers style buildings. Each building meets the requirements of the *National Historic Preservation Act* as historic properties and should be preserved for future generations.

Response: *Y-12 (in conjunction with the State Historic Preservation Office) has identified buildings that will no longer be required to support the Y-12 missions. However, two facilities of major historic significance are envisioned to be physically preserved as National Historic Landmarks (NHL), Buildings 9204-3 and 9731. Building 9731 is an NNSA facility, and 9204-3 is a DOE-NE building. At some point in the future, these two facilities would become accessible, under controlled conditions, to the public.*

Building 9706-2 currently houses the Y-12 Plant Shift Superintendent's Office as well as some emergency management functions. Current plans call for these functions to be moved to a proposed new facility, the Complex Command Center, in the 2012 time frame. Building 9706-2 is also currently being used for a hands-on radiological training course, which simulates terror attacks in a medical or research environment to instruct response forces. The NNSA's Global Threat Reduction Initiative (GTRI) established this unique course to train hospital and university response forces to mitigate radioactive source theft and to rehearse attacks. Building 9706-2 is slated for future demolition if there is no long term use identified beyond its current functions. NNSA will follow the NHPA regulations regarding this and all historic buildings.

12.H SOCIOECONOMICS

Commentors stated that continued operation of Y-12 is crucial for economic development of Tennessee. Commentors stated that UPF will provide additional jobs and continued economic growth for the region, as well as positioning Y-12 as a leader in technology. Commentors stated that the Oak Ridge DOE complex has a major economic impact on the economic development of

Tennessee and specifically on Roane County through its operations and its role as a major employer in the region. Commentors also stated that the construction of a new nuclear facility will have negative impacts on socioeconomics of the region. Commentors stated that 2,500 jobs would be lost since the new facility (UPF) would largely be automated. Commentors believe that a new UPF would have significant detrimental economic impact on Oak Ridge and the surrounding region. The new UPF would reduce the workforce compounding the regional negative economic impact (i.e., the jobs to be cut would be long-term, high salary jobs rather than lower paying short-term construction jobs). Another commentor stated that the future of Y-12 shows a sharp decline in jobs for weapons production activities. An increase in dismantlement operations should result in a steady or slight diminished workforce requirement.

Response: *Section 5.10 of the SWEIS presents the socioeconomic impacts of the alternatives. As discussed in that section, the operational workforce for the UPF would be expected to be smaller than the existing EU workforce due to efficiencies associated with the new facility. Any reductions are expected to be met through normal attrition/retirements. NNSA agrees ORR has a major economic impact on the economic development of Tennessee.*

12.J HEALTH AND SAFETY

Commentors expressed general concern over health and safety issues to the public from Y-12. Commentor stated that she was tired of the endless news stories about dangerous conditions at Y-12. Commentor stated that Y-12 has significant safety issues.

Response: *NNSA acknowledges concerns related to health and safety from Y-12 operations. Safety is paramount to NNSA and facilities are operated by NNSA in a safe and environmentally-conscious manner. Sections 5.12 and 5.14 of the SWEIS present the potential impacts to human health from normal operations and accidents, respectively. Radiological and non-radiological impacts were considered, and potential impacts to both workers and the public are analyzed and presented. As shown in those sections, all potential impacts from normal operations would be well below regulatory standards and would have no statistically significant impact on the health and safety of either workers or the public.*

Statistically, for all alternatives, radiological impacts would be expected to cause less than one LCF to the 50-mile population surrounding Y-12. Potential impacts from accidents were estimated using computer modeling for a variety of initiating events, including fires, explosions, and earthquakes. For all alternatives, the accident with the highest potential consequences to the offsite population is the aircraft crash into the EU facilities. Approximately 0.4 LCFs in the offsite population could result from such an accident in the absence of mitigation. A maximally exposed individual (MEI) would receive a maximum dose of 0.3 rem. Statistically, this MEI would have a 2×10^{-4} chance of developing a LCF, or about 1 in 5,000. This accident has a probability of occurring approximately once every 100,000 years. When probabilities are taken into account, the accident with the highest risk is the design-basis fire for HEU storage. For this accident, the maximum LCF risk to the MEI would be 4.4×10^{-7}, or about 1 in 2.3 million. For the population, the LCF risk would be 4×10^{-4}, or about 1 in 2,500.

The impacts associated with the potential release of the most hazardous chemicals used at Y-12 were modeled to determine whether any impacts could extend beyond the site boundaries. Based upon those modeling results, it was determined that no chemical impacts would cause adverse health impacts beyond the site boundary.

12.J.1 CANCER TO WORKERS

Commentors expressed concern over cancer to workers due to radiological operations. Commentor stated that the cancer statistics are misleading because a lot of workers leave the Oak Ridge area.

Response: *Section 5.12.1.2 of the SWEIS presents the impacts of the alternatives on worker health. As shown in Table 5.12.1.2-1, the total worker doses from the alternatives would vary from a low of 16.0 person-rem (Alternative 5) to a high of 49.0 person-rem (Alternatives 1 and 3). For all alternatives, the risk of cancer to workers would be small (less than approximately 0.03 latent cancer fatalities [LCF] to the worker population annually), or about 1 LCF every 33 years. With respect to cancer statistics related to past workers, Section D.8 of the SWEIS provides information on past and current epidemiological studies.*

12.J.2 HEALTH OF SURROUNDING OAK RIDGE AREA

Commentors expressed concern over impacts to health and safety from the Oak Ridge Reservation environment.

Response: *Sections 5.12.1.1 and 5.12.2.2 of the SWEIS present the impacts of the alternatives on public health. Statistically, for all alternatives, radiological impacts would be expected to cause less than 0.0009 LCFs to the 50-mile population surrounding Y-12 annually, or about 1 LCF every 1,100 years. With regard to potential impacts from hazardous chemical, hazard quotients would be expected to be below 0.05. Hazard quotient levels less than 1.0 are considered indicative of acceptable risk (i.e., below threshold values at which adverse health effects may occur).*

12.J.3 RELEASE OF MATERIALS

Commentors stated that the SWEIS treatment of potential releases to air and water is partial and deficient. It does not list materials/contaminants used at Y-12, does not provide information about scenarios in which materials might be released, does not even use a probability/risk matrix to perform a cursory overview of risks posed by the various materials used in uranium processing operations at Y-12. Despite that some small fraction of these materials is classified, the SWEIS can provide detailed analysis of these materials and assessment of risks associated with release scenarios without disclosing their purpose. Another commentor stated that the Draft SWEIS should fully document past, present, and projected future releases of mercury to all media, and explore the potential harm of past, present and projected future releases to humans, flora, fauna and the environment, and fully describe past, present and future cleanup of mercury in soil, water, and facilities.

Response: *The SWEIS presents information related to potential releases of chemicals and radionuclides to air and water (see, for example, Table 4.6.2.2-2 [air emissions], Table 4.7.2-1 [uranium releases], Table 4.12.1-6 [toxic chemical releases]). The impacts of any chemical and radiological releases are analyzed in Chapter 5 of the SWEIS. Releases and impacts associated with both normal operations and potential accidents are presented in Sections 5.12.2 and 5.14.2. Potential impacts associated with mercury are presented in Section 5.12.2.1 and 5.12.2.2. See comment-response 12.P for a discussion of future cleanup plans.*

12.J.4 URANIUM DISCHARGE

Commentors stated that since uranium is a toxic heavy metal which carries risks from its chemical properties; these risks must be evaluated, along with an analysis that combines the biologic and radiologic risks. Use of curies as a unit of measure gives no hint to the amount of material released.

Response: *The SWEIS presents both the curie content and the mass of uranium released (see Table 4.7.2-1). As shown in that table, on average, there are approximately 0.0004 curies per kilogram of uranium (this varies depending upon the specific isotopic concentration of the uranium). NNSA agrees that uranium is both a radiological hazard and a toxic heavy metal hazard. Sections 5.12 and 5.14 present the potential impacts associated with hazardous materials, including uranium. See comment response 12.M.3 for a discussion of biological risk.*

12.L WASTE MANAGEMENT

Commentors expressed concern with the wastes that will be generated through nuclear weapons operations and stated that the waste streams must be fully characterized and quantified. Treatment, disposal, and/or storage options for those wastes must be evaluated, along with massive waste streams that will be generated during decontamination and decommissioning (D&D). The final SWEIS should either attempt a thorough characterization of waste streams or propose a timeline for preparing a supplemental EIS on Waste Streams from D&D. In addition, the Y-12 SWEIS should identify other cleanup operations which may have an impact on the environment that are likely to take place over the next 5-7 years. In cases where waste streams might compete for limited storage or disposal space, the SWEIS should be clear about the criteria that will be used to make decisions. The use of offsite facilities, and the transportation hazards attendant to offsite shipments, should be evaluated and compared to the benefits and hazards of onsite treatment, storage or disposal. EPA stated that the proposed action will require continuing management of radioactive and hazardous materials and waste. There are inherent environmental and worker safety concerns regarding storage, transportation and disposal of hazardous waste and radioactive wastes. Long-term onsite storage and disposition of wastes is a concern that will need to be addressed as the project progresses. Nuclear waste from nuclear power plants continues to grow without a viable disposal solution.

Response: *Section 5.13 of the SWEIS presents waste management impacts associated with the alternatives. Under all alternatives, Y-12 would continue to generate and manage wastes, including low-level radioactive waste (LLW), mixed LLW, hazardous waste, and sanitary/industrial (nonhazardous) waste. The waste management treatment and disposal*

capabilities at Y-12 would be adequate to handle all wastes generated by operations for all alternatives. The impacts to the environment and human health from continued operations at Y-12, which include waste management operations, are presented in Chapter 5 of the SWEIS. The potential impacts from D&D are presented in Section 5.16 of the SWEIS. Nuclear waste disposal from nuclear power plants is beyond the scope of the SWEIS.

12.M FACILITY ACCIDENTS

12.M.1 SEISMIC AND NATURAL PHENOMENA

Commentors stated that the Draft SWEIS does not provide adequate discussion of seismic concerns surrounding current and future buildings. An updated seismic hazard analysis must be done for the Y-12 site. Seismic and other structural integrity concerns about several buildings (especially 9204-2E) should be addressed in any future scenario. Commentors stated that the Draft SWIES asserts that, under the No Action alternative, there is no change in risk from earthquakes. In assessing the UPF, the SWEIS states new construction would incorporate protections into the design of the new facility that would reduce risks from seismic activity, but absent specific design information, the SWEIS says a full analysis of consequences of an earthquake are not possible. Nevertheless, the SWEIS declares a UPF designed to Performance Category 3 would sustain damage "less frequently than in existing facilities." Commentor stated that this fact does not relieve the NNSA of its obligation to conduct a rigorous analysis of the effects of earthquakes, including but not limited to those that can be "reasonably" expected. Given the nature of work, the number of workers and the materials placed at risk at Y-12, all alternatives should be fully analyzed with regard to structural building performance in severe events that may exceed the "reasonably expected," including catastrophic failure of some or all structures. This analysis should also examine other complications that might arise in the event of a significant earthquake which could impact activities in Bear Creek Valley. Similar analysis addressing risks from tornadoes and flooding must also be conducted; the location of Y-12 in a narrow valley, combined with the naturally high water table in Bear Creek Valley, indicate a significant risk from floods. The immersion of HEU in water changes criticality calculations dramatically, adding a unique dimension to the analysis required in assessing risks from flooding. A detailed analysis of the cumulative and compounding impacts possible in a severe earthquake or tornado event should be analyzed in the SWEIS as a "bounding event." Commentor stated that the bounding accident for the UPF (an aircraft crash/attack) is not the bounding accident that should be used for the Y-12 SWEIS, including the UPF. Commentor stated that the bounding accident should be impacts from a severe earthquake or tornado event. Commentor states that the DOE and other published studies (i.e., Science Magazine) have identified seismic issues as a significant concern for the facilities at Y-12, and could be expected to predict a significant seismic event in the future. Commentor expressed concerns that Building 9204-2E is at risk of collapse in a seismic event or a 75 mph wind.

Response: *The potential for earthquakes is addressed in Sections 4.5.3 and 5.5. As discussed in those sections, Y-12 lies at the boundary between seismic Zones 1 and 2, indicating that minor to moderate damage could typically be expected from an earthquake. Y-12 is traversed by many inactive faults formed during the late Paleozoic Era. There is no evidence of capable faults (surface movement within the past 35,000 years or movement of a recurring nature within the*

past 500,000 years) in the immediate area of Y-12 as defined by the NRC "Reactor Site Criteria" (10 CFR 100). The nearest capable faults are approximately 300 miles west of Y-12 in the New Madrid Fault zone. Based on the seismic history of the area, a moderate seismic risk exists at Y-12. However, this should not negatively impact the construction and operation of facilities at Y-12. All new facilities and building expansions would be designed to withstand the maximum expected earthquake-generated ground acceleration in accordance with DOE Order 420.1B, Facility Safety, and accompanying safety guidelines. It is too early in the design process to analyze building seismic performance, but this would be performed in the detailed design and safety analysis processes.

The SWEIS considers potential impacts that could be caused by earthquakes and other natural phenomena such as wind, rain/snow, tornadoes and lightning (see Section D.9). Criticality is also considered. Table D.9.3-1 identifies the accidents that were considered for the major operations at Y-12. As shown in that table, the SWEIS considered potential impacts from earthquakes and other natural phenomena, including wind, flood, and lightning. The accidents analyzed in detail for the SWEIS bound any impacts that would be associated with earthquakes and other natural phenomena. This is due to the fact that the accidents analyzed in detail in the SWEIS would have higher radiological releases than accidents caused by natural phenomena.

With respect to potential accidents associated with existing/old facilities, as discussed in Section 5.14.1.1, the SWEIS accident analysis process began with a review of all Y-12 facilities, including Building 9204-2E, with emphasis on building hazard classification, radionuclide inventories, including type, quantity, and physical form, and storage and use conditions. For each of these facilities, the next step was to identify the most current documentation describing and quantifying the risks associated with its operation. Current safety documentation was obtained for all of these facilities. From these documents, the next step was to identify potential accident scenarios and source terms (release rates and frequencies) associated with those facilities.

12.M.2 ACCIDENTS INVOLVING CHEMICALS

Commentor stated that the SWEIS should analyze a range of accident/spill scenarios, including multiple contemporaneous excursion events due to catastrophic events. Chemicals and hazardous materials that represent the full range of risks posed by materials used at Y-12 should be analyzed. The SWEIS evaluation of accident scenarios cites methodologies used to "evaluate the potential consequences associated with a release of each chemical in an accident situation" (p. 5-91). This language suggests multiple materials were analyzed for risks to workers, the environment and the public from releases. But the actual accident scenario description says "the chemical analyzed for release was nitric acid," suggesting only one chemical was used for computer modeling to evaluate consequences associated with a release. Commentor asked if hydrogen fluoride modeling was performed for offsite releases, as well as name of computer model, and raw input for these models. Commentor also stated that a more complete analysis of lithium risks, including forms in which it is used and the attendant environmental risks, and mitigation measures should be included in SWEIS, as weapons activities would use lithium. Commentor added that the Draft SWEIS also failed to include other hazardous materials used at

Y-12. Commentor stated that the SWEIS should include multiple contemporary excursion events due to catastrophic events.

Response: *As discussed in Section D.9.7, potential chemical hazards and accident risks were obtained from review of the Y-12 chemicals and accident scenarios reported in previous NEPA documents and safety analysis reports (see Section D.9.1.2 for a discussion of this process and the documents that were reviewed). That review included consideration of both hydrogen fluoride and lithium. A chemical's vapor pressure, acceptable concentration, and quantity available for release were factors used to rank a chemical's hazard. Determination of a chemical's hazardous ranking takes into account quantities available for release, protective concentration limits, and evaporation rate. Based on this review, NNSA determined that a chemical accident involving a release of nitric acid was a reasonable choice for modeling, as this chemical release posed the highest potential hazard. With respect to "multiple contemporary excursion events due to catastrophic events," the SWEIS includes an analysis of impacts from many catastrophic events, including major fires, explosions, aircraft crashes, and earthquakes. This analysis is consistent with all regulatory requirements.*

The SWEIS discusses toxic chemical releases in Section 4.12.1. As shown in Table 4.12.1-6, neither hydrogen fluoride nor lithium exceeded reporting thresholds for actual releases. Section 5.12.2.2 discusses potential impacts associated with hydrogen fluoride. As shown in Table 5.12.2.2-3, hazard quotients for hydrogen fluoride were well below 1, meaning that no adverse effects would be expected.

12.M.3 ACCIDENTS INVOLVING OTHER LIFE FORMS (PLANTS AND ANIMALS)

Commentor stated that impacts of the harm, potential or real, of releases of chemicals and materials are quantified in ways that evaluate risks to humans. Commentor stated that human beings are not the only forms of life with value. Endangered or protected species are not the only species impacted—though they lack legal protections, impacts on other species should be quantified and considered; a fundamental premise of NEPA is that, all things considered, options that limit harm to the environment are preferable to those which cause more harm and, in any event, decisions should be informed fully about the environmental consequences likely to flow from them.

Response: *The SWEIS analyzes the impacts of radiological and chemical releases on human health. This approach is based on the concept that protecting humans generally protects biota. Based on the analysis in the SWEIS, the potential impacts to human health would be very small. For example, during normal operations, the radiological dose to workers and the public would be more than ten times less than the average dose from background radiation. Accident impacts would also be small, such that less than 1 LCF would result to the surrounding population for all accidents analyzed. When probabilities are taken into account, the risk of an LCF to the surrounding population would be less than 1 in 10,000 years. With regard to potential impacts from hazardous chemicals, hazard quotients would be expected to be below 0.05. Hazard quotient levels less than 1.0 are considered indicative of acceptable risk to humans (i.e., below*

threshold values at which adverse health affects may occur). NNSA thinks that the SWEIS presents the decisionmaker with adequate information needed to make informed decisions.

The 2008 Oak Ridge Annual Site Environmental Report (ASER) contains information related to potential impacts to biota from radiological releases at Y-12. As stated in the 2008 ASER, DOE Order 5400.5 sets an absorbed dose rate limit of 1 rad/day to native aquatic organisms from exposure to radioactive material in liquid wastes discharged to natural waterways. To demonstrate compliance with this limit, the aquatic organism assessment was conducted using the RESRAD-Biota code (Version 1.21). At Y-12, doses to aquatic organisms were estimated from surface water concentrations at six different sampling locations. In 2008, the absorbed dose rates to aquatic organisms was found to be below the DOE aquatic dose limit of 1 rad/d at all six Y-12 locations (DOE 2009b).

Per DOE Order 5400.5, an absorbed dose rate of 0.1 rad/day is recommended as the limit for terrestrial animal exposure to radioactive material in soils. To demonstrate compliance with this limit, the terrestrial animal assessment was also conducted using the RESRAD-Biota code (Version 1.21). The screening conceptual model for terrestrial animals has the animal (e.g., deer mouse) surrounded by soil, and soil presents both an internal and external dose pathway. The screening conceptual model for terrestrial animals also includes the potential for exposure to contaminated water from soil pore water or by drinking from contaminated ponds or rivers. With the exception of samples collected on the White Oak Creek floodplain, samples taken at all soil sampling locations passed either the initial-level screening, or second-level screening (DOE 2009b).

12.N CUMULATIVE IMPACTS

Commentors stated that the SWEIS should analyze all potential cumulative environmental effects of past, present, and reasonably foreseeable future actions. The cumulative impacts of all nearby facilities, including ORNL and ETTP, must be examined, including accidents at nearby facilities. By improperly segmenting the HEUMF and UPF, and production operation zone upgrades (CMC) the required hard look at cumulative impacts of these facilities together is avoided. The cumulative impacts section of the SWEIS does not look at the connected impacts of the three facilities (HEUMF, UPF, CMC) in one NEPA review document. Commentors added that more information about the CMC will need to be developed and included for this analysis to meet NEPA's statutory requirements. Cumulative impacts and synergistic effects of potential releases must be analyzed, including all other known existing and possible future contaminants.

Response: *Chapter 6 of the SWEIS presents the potential cumulative environmental impacts associated with the SWEIS alternatives. That chapter considers ORNL and ETTP activities as appropriate, for all resources addressed. For example, the waste management analysis includes consideration of wastes from all activities at ORR. It should also be noted that Chapter 4 of the SWEIS includes consideration of activities at ORNL and ETTP in the environmental baseline at Oak Ridge. For example, the measured concentrations of air pollutants (see Table 4.6.2.2-1) are based on all emissions from ORR, not just those from Y-12. Likewise, the impacts to groundwater quality (see Section 4.7.1) are not limited to Y-12, but rather from all activities at ORR.*

Similarly, public doses from operations are presented for the entire ORR, not just Y-12 (see Tables 4.12.1-1 through 4.12.1-5).

NNSA disagrees that the SWEIS improperly segments the HEUMF, UPF, and CMC. The HEUMF, now operational, is an existing facility that is part of the No Action Alternative baseline that is part of all alternatives assessed. The UPF, which is a proposed action in the SWEIS, is evaluated in the SWEIS. The CMC, as described in Section 3.3, is not proposed and is not ripe for decisionmaking. If ever proposed, the CMC would consolidate some existing non-nuclear operations. Because the existing operations would continue, the SWEIS did not consider any significant changes that could result from a CMC.

12.O PAST CONTAMINATION AT Y-12

Commentors stated that the SWEIS does not mention the past 60 years of contamination and pollution that has occurred due to the processing of uranium and nuclear matter here; and therefore there's no mention on really how to keep that from occurring or continuing to occur. Commentors stated that the SWEIS fails to adequately analyze and prioritize cleanup of existing contamination. Contamination around the community of Scarboro is not addressed, along with groundwater to the west and east, and aquifers reportedly contaminated by radionuclides, metals, and hazardous chemicals such as TCE. Commentor stated that, at present, there is no other forum for comprehensive analysis of environmental management activities at Y-12. The SWEIS should at least identify cross-cutting issues and establish a minimal level of information that can be used to coordinate cleanup/waste management activities. Cleanup and dismantlement of secondaries are examples of two crucially important future missions for Y-12 that should receive more attention in the SWEIS.

Response: *Contamination and pollution that has occurred in the past are discussed in relation to the existing environmental conditions at the site as a result of past operations (see, for example, Section 4.7.1 which discusses potential groundwater contamination). The Y-12 SWEIS is a forward-looking document that analyzes the potential environmental impacts of reasonable alternatives for continued operations at Y-12. Nevertheless it accounts for the environmental baseline of Y-12 and the existing contamination of past activities. DOE has a large remediation program and is addressing past contamination issues with aggressive programs at each of its facilities. These programs are being conducted in accordance with Federal and state regulatory requirements and include implementation of administrative and engineered controls to minimize additional releases as well as surveillance monitoring of the environment and reporting of exposure assessments.*

12.P INTEGRATED FACILITIES DISPOSITION PROGRAM

Commentors stated that the Integrated Facilities Disposition Program (IFDP) needs to be more fully incorporated into the Final SWEIS and Record of Decision. Commentors support the IFDP effort as a critical component to the future success of Y-12 and states that it must be fully incorporated into the ROD. Commentor stated that when OREPA attempted to obtain from DOE or the State of Tennessee a list of all cleanup/waste management projects at Y-12 in the last five years, along with a simple indicator of the status of projects, OREPA was told that no such list

exists. This segmentation of cleanup projects has obvious disadvantages. Since no such vehicle exists otherwise, the SWEIS should be a site-wide environmental impact statement.

Response: *As discussed in Section 1.2 of the SWEIS, the IFDP is a strategic program for disposing of legacy materials and facilities at ORNL and Y-12 The IFDP includes both existing excess facilities (e.g., facilities not required for DOE's needs or the discharge of its responsibilities) and newly identified excess (or soon to be excess) facilities. Under the IFDP, the D&D of approximately 188 facilities at ORNL, 112 facilities at Y-12, and remediation of soil and groundwater contamination would occur over the next 30 to 40 years. The IFDP will be conducted as a remedial action under CERCLA. Cleanup and D&D activities conducted under CERCLA are reviewed through the CERCLA process, which incorporates NEPA values. The potential impacts of the IFDP are analyzed in the cumulative impacts section of the SWEIS (Chapter 6). NNSA believes that the SWEIS includes an analysis of all reasonable alternatives and all cleanup/waste management actions that are required to be included in a NEPA analysis.*

12.Q GLOBAL THREAT REDUCTION INITIATIVE (GTRI)

Commentors stated that Y-12's mission includes support for the GTRI. Commentors stated that Y-12's role is to support the retrieval, processing and disposition of special nuclear materials. The SWEIS addresses this mission and refers to documentation prepared for previous shipments of materials to Y-12. The treatment in the SWEIS of materials received from foreign sources is inadequate. Impacts are assessed only for special nuclear materials. In reality, special nuclear materials are often only part of the total material received. The analysis of impacts from the GTRI must be comprehensive and detailed; the impacts of all materials, not just the special nuclear material, must be included.

Response: *The description of Y-12's GTRI mission has been revised in Section 2.1.2.2. The analysis of potential impacts associated with the GTRI is presented in Section 5.15 of the SWEIS. That analysis is based upon the best information that exists for this continued mission. Although the GTRI program has a list of possible future shipments, it is not possible to know with certainty: (1) the locations from where all future nuclear materials would come; (2) the exact quantities of future nuclear materials; and (3) the specific radionuclides of the future nuclear materials. Because of these uncertainties, the environmental analysis in Section 5.15 summarizes the information in recent relevant environmental analyses to provide an environmental baseline of continuing this mission. In the future, as part of the decisionmaking process related to the receipt and storage of any new nuclear materials, proposals would be compared against this baseline to determine whether additional NEPA documentation would be required. The impacts presented in Section 5.15 focus on nuclear materials, as these materials are considered to have the potential to cause the most significant impacts. In preparing Section 5.15, NNSA presented general conclusions associated with the potential impacts of the GTRI, which involves more than just special nuclear materials.*

12.R COMPLEMENTARY WORK / WORK FOR OTHERS PROGRAM

Commentor stated that the Work for Others Program has grown over the past 9 years. Work for Others Program activities should be described in detail in this SWEIS, along with the facilities in

which the work takes place, materials used, waste streams generated, potential impacts of releases, etc.

Response: *Section 2.2.1 describes the Complementary Work/Work for Others Program at Y-12. There are no proposals that would significantly change the Complementary Work/Work for Others Program. As such, these activities would continue under all alternatives in existing facilities and would contribute to the environmental impacts that are presented in Sections 5.1 through 5.16 of the SWEIS for the No Action Alternative.*

12.S CLIMATE CHANGE/JUST DO IT APPROACH

DOE should evaluate greenhouse gas (GHG)/climate change impacts under NEPA and should use the Ten-Step Approach to Addressing GHG and Climate Change Impacts from Ron Bass's presentation, "NEPA and Climate Change: What Constitutes a Hard Look?" The recommended 10-step approach takes into consideration the existing provisions of the NEPA regulations, recent court decisions, and various state programs. The steps conform to the main elements of a NEPA document.

Response: *Section 5.6.1.8 presents a greenhouse gas analysis for the SWEIS. To estimate the greenhouse gases associated with each alternative, the analysis focuses on three areas: (1) steam plant operations; (2) electric power usage; and (3) vehicle operations. Because of the reduced level of operations and reduction in size of the operational footprint at Y-12, the Capability-sized UPF and No Net Production/Capability-sized UPF Alternatives would have significantly lower greenhouse gas emissions than the No Action, UPF, and Upgrade in-Place Alternatives. However, even the highest levels of greenhouse gas emissions (No Action and Upgrade in-Place Alternatives) would be relatively small (much less than 1 percent) compared to the state-wide emissions in Tennessee.*

12.T WETLANDS/SURVEYS/UPF HAUL ROAD

Commentor expressed concern that the Y-12 Draft SWEIS makes no mention of wetlands disturbance in its analysis of environmental impacts resulting from construction and operation of the UPF, even though NNSA has applied for a permit for construction of a Haul Road for the UPF that could disturb wetlands. Commentor also stated that NNSA stated in the Draft SWEIS that proposed construction sites would be surveyed for the presence of special status species before construction begins, and mitigation actions would be developed. Commentor is concerned that the permit application calls into question DOE's commitment to proceed in ways both cognizant of and protective of environmental resources. Commentor stated that DOE needs to prepare a Supplemental Draft SWEIS because the Haul Road and wetland impacts were not presented in the Draft SWEIS

Response: *The Draft SWEIS was published using the best available information for the proposed UPF, which is in a preliminary design stage. When the Draft SWEIS was published, NNSA had not yet identified the need for a Haul Road extension (including a Site Access and Perimeter Modification Road), nor proposed locations for these roads, if needed. As such, the Draft SWEIS did not include any assessment of potential impacts to wetlands from such roads. In*

February 2010, the proposed location for the Haul Road extension (including the Site Access and Perimeter Modification Road) was identified, and as a result, has been included in the Final SWEIS (see Figure 3.2.2-3 of the Final SWEIS). As discussed in Section 5.1.2 of the Final SWEIS, the Haul Road would accommodate the number and size of construction vehicles needed on site, as well as safely provide transportation away from occupied roadways. The designed alignment for the Haul Road follows the power line corridor and thus avoids forest habitat found to the north and south of the power line corridor.

As discussed in Section 5.8.2 of the Final SWEIS, the Haul Road extension and Site Access and Perimeter Modification Road would necessarily cross some headwater areas of small unnamed tributaries to Bear Creek, some of which contain wetlands. It is anticipated that the Haul Road extension and the Site Access and Perimeter Modification Road would result in the loss of 1.0 acre of wetlands, and place two small stream segments (approximately 300 feet [total] of unnamed tributaries to Bear Creek) within culverts. A total of approximately three acres of wetland would be created as part of proposed action. The mitigation wetlands would include expansion of some existing wetlands "upstream" and adjacent to the new Haul Road, as well as creating additional wetlands in the Bear Creek watershed.

*As mitigation for the loss of stream segments, a section of Bear Creek would be restored and relocated to a more natural channel course. The restoration of Bear Creek would focus on the stream section near the confluence of the unnamed tributaries and Bear Creek. The restoration of this previously disturbed portion of Bear Creek would re-establish natural stream conditions and diversity of fish species, particularly the Tennessee Dace (*Phoxinus tennesseensis*), which the State of Tennessee classifies as "in need of management." Wetland and stream mitigations would be conducted in accordance with the requirements set forth by the U.S. Army Corps of Engineers and the TDEC.*

No site preparation or preliminary construction work would take place on the proposed UPF until a ROD is issued. Additionally, as stated in Section 5.8.6 of the SWEIS, NNSA would survey any proposed construction sites for the presence of special status species before construction begins, and would develop any required mitigation measures.

In accordance with 40 CFR 1502.9(c)(1), NNSA determined that the Haul Road extension and the Site Access and Perimeter Modification Road do not represent substantial changes in the proposed action that are relevant to environmental concerns, nor do they represent significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts. Consequently, NNSA determined that a Supplemental Draft Y-12 SWEIS was not required.

12.T.1 Appendix G

Commentor stated that nowhere in the notice or document does it specify what the parent document is for Appendix G. This makes it difficult for stakeholders to put it in the appropriate context and examine the actions that make the Haul Road necessary and whether it was proposed in the larger document.

Response: *The parent document is the Y-12 SWEIS. The information presented in the Wetlands Assessment has been included in the SWEIS as Appendix G.*

12.T.2 Appendix G

Commentor stated that two permits for this action were applied for prior to this Wetlands Assessment being released. The applications should have been done after public input was received and the decision finalized. By applying for the permits first, Y-12 gives the appearance that it will proceed with the proposed action with no regard for public opinion.

Response: *The need for the permits and wetland mitigation was not identified until after the Draft SWEIS was released for public comment in October 2009. The process of obtaining permits helps to identify and resolve issues and/or concerns that State or Federal agencies may have. The permitting processes included public comment periods, and NNSA is including the Haul Road extension and Wetlands Assessment in the Final SWEIS. An approved Aquatic Resource Alteration Permit was received from TDEC on June 10, 2010 (TDEC 2010). A final Section 404 Permit from the U.S. Army Corps of Engineers was received on September 2, 2010 (USACE 2010). These permits have followed all regulatory requirements for process and technical content.*

The Haul Road extension and impacts to wetlands were not discussed in the Draft SWEIS because the potential need for the Haul Road extension (with wetland impacts) had not been identified prior to the Draft SWEIS release. NNSA has never intended to proceed with the proposed action without public comment and compliance with applicable permitting processes. The public was given a 30 day comment period for each of the permitting processes conducted by TDEC and USACE. NNSA has provided an 18 day public comment period under 10 CFR Part 1022. Full, detailed project plans and design drawings were also available through the USACE and TDEC in addition to the abridged summaries provided in their respective public notices.

12.T.3 Appendix G

Commentor stated that there is confusion regarding the proposed Haul Road extension. "Haul Road" is the commonly understood name of the road that is used to transport waste from East Tennessee Technology Park to the CERCLA Waste Facility. The confusion could be alleviated by including a map of the area that shows the relationship between the UPF site, the various resource sites, the affected wetlands, Bear Creek Road and the CERCLA Waste Facility and its Haul Road. The use of annotated photographs is insufficient to show the geographic relationships, and the labels of locations on the photos are too tiny to be readable.

Response: *Improved maps are provided in Appendix G to show the extension of the Haul Road as suggested. The proposed Haul Road extension is a continuation of the road between the East Tennessee Technology Park and the CERCLA Waste Facility and would further connect to the proposed UPF Site. The new map has additional labeling for clarification with larger font. NNSA has also included an additional aerial photograph of the project area for orientation.*

12.T.4 Appendix G

According to commentor, Section 2.1 states, "Although the primary use for the Haul Road extension would be for construction activities related to UPF, it could also be used to support other Y-12 activities (e.g., future EM cleanup activities at Y-12)." If it does not connect to the CERCLA Haul Road, then how would support of future cleanup activities be justified? Unless there are well established future needs, it would be preferable to plan for the decommissioning of the Haul Road extension and restoration of affected wetlands after the UPF is finished.

Response: *The Haul Road extension would connect to the existing Haul Road (also known as the "CERCLA Haul Road") and would be available to support future site cleanup and D&D activities.*

12.T.5 Appendix G

Commentor stated that the document seems to imply that soil will be taken from borrow areas for fill and excess soils placed at spoils sites, all accessed by the Haul Road. Appropriate planning for UPF site preparation can minimize the amount of soils transported; soils cut from the site should be used for fill where needed. This will also help control construction costs.

Response: *NNSA agrees that appropriate planning can minimize the amount of soils transported. Soils would not be taken from borrow areas for use at the UPF. Due to the scale of the UPF facility, soil removal has been estimated to exceed fill requirements. The soil removed from the UPF site preparation and excavation would be used sequentially to fill/construct the Haul Road, followed by fill and dewatering at the Wet Soils area and fill/restoration at the West Borrow area. This would minimize soil transportation and control construction costs.*

12.T.6 Appendix G

Commentor stated that the document should give the cost comparison between widening Bear Creek Road and extension of the Haul Road. Additionally, transportation always involves risks, and one must assume that tractor trailers and other large vehicles use Y-12 roadways on a regular basis, with automobile drivers exercising appropriate caution. It is unclear why large dump trucks are expected to pose a special risk.

Response: *Use of the existing Bear Creek Road was not considered a reasonable alternative for the Haul Road extension for several reasons. In order to safely handle heavy earthmoving truck traffic, Bear Creek Road would need to be widened, which would result in additional impacts to aquatic resources and wetlands in the form of bridge and/or culvert widening or improvement at three Bear Creek crossings. However, widening of Bear Creek Road would not remove the inherent risk of allowing over-sized construction equipment to routinely use the same roadway as passenger vehicles.*

The biggest drawback with the use of Bear Creek Road would be the unacceptable compromise to Y-12 worker and public safety. Construction equipment is expected to include high capacity earthmoving equipment, not authorized or intended for use over public roadways. The transport

of hundreds of thousands of cubic yards of material would require thousands of truckloads that would operate continuously for many months. The interface between plant and construction traffic would increase the likelihood of an accident. Any such accident between a commuter vehicle and a fully-loaded earthmoving truck would likely have severe consequences for the commuter vehicle and its occupants. In summary, this alternative was rejected due to basic operational limitations in addition to critical site safety and security concerns unique to Y-12.

Traffic and Transportation impacts associated with the alternatives are addressed in Section 5.4 of the SWEIS. That section has been updated to reflect transportation impacts of using the Haul Road extension.

12.T.7 Appendix G

Commentor stated that, in general, it is undesirable to fragment habitats, whether they are wetlands or not. NNSA should reconsider whether existing roadways can be used to support construction of the UPF. The impacts to Bear Creek from widening of Bear Creek Road are likely minimal compared to the habitat and wetland damage and fragmentation from constructing 1.2 miles of Haul Road, which at 40 feet in width equals habitat destruction totaling nearly 6 acres.

Response: *NNSA recognizes and agrees that habitat fragmentation is not desirable; however, the existing roadways cannot be used safely by the required construction vehicles to support construction of the UPF. The impact and cost to widen Bear Creek Road to accommodate Caterpillar 740 type trucks would not be minimal. It would require closing Bear Creek road to passenger and normal site use and the widening of Bear Creek Road would have comparable impacts to wetlands, Bear Creek stream crossings, and other habitats. The proposed Haul Road has been routed along an existing powerline corridor to minimize impacts to native, undisturbed areas. The one acre wetland fill has been permitted by TDEC, to be offset by the creation of three acres of new wetlands in the Bear Creek watershed.*

12.T.8 Appendix G

Commentor stated that the Local Oversight Committee's (LOC) Citizens' Advisory Panel (CAP) was not able to review, modify, and approve its comments on Appendix G because the release of the document and its comment deadline fell between the monthly meetings. Commentor added that "none of the reasons you listed for not extending the deadline are compelling; you seem to imply that because you have done the minimum required, you do not need to accommodate a stakeholder group's request. This is a far cry from the excellent working relationship that the LOC and CAP (as well as other community stakeholders) have cultivated with Oak Ridge Office's Environmental Management Program, which has shown courtesy and flexibility in accommodating meeting schedules, and which we had hoped would be duplicated with Y-12. Moreover, citing other documents that have been in the public domain is irrelevant; the comment period is for the Y-12 Wetlands Assessment only. In addition, most Public Notices for NEPA documents available for comment include a statement that comments received after the deadline will be incorporated to the extent possible; it would have been appropriate for you to state this.

We hope that deadlines associated with future Y-12 documents will give sufficient time for stakeholder groups to read, evaluate, and prepare comments."

Response: *NNSA recognizes the value of stakeholder involvement and has provided reasonable opportunity for public input while still enabling NNSA to meet its assigned missions. The public has been given two 30-day comment periods by TDEC and USACE for their permits and NNSA has allowed an 18-day public comment period under 10 CFR Part 1022, thus providing the public with three opportunities to comment on the project. In addition, the project would not proceed until the Y-12 SWEIS ROD has been approved. The ROD would not be approved until at least 30 days after the EPA notice of availability for the Final SWEIS has been published in the* Federal Register.

12.T.9 Appendix G

Commentor stated that DOE must meet its obligations under NEPA by either: (1) reissuing a new Draft SWEIS with detailed plans on the environmental impacts associated with the UPF, including the excavation and relocation of massive amounts of soil, the construction of the Haul Road, the disruption of wetlands areas, and any other additional environmental impacts expected as a result of construction; or (2) issuing the Final Y-12 SWEIS based on the Draft SWEIS and prepare a separate, comprehensive EIS specific to the UPF, which includes plans for excavation, characterization and disposal of soil, the construction of the Haul Road, the disruption of wetlands areas, and any other additional environmental impacts expected as a result of construction.

Response: *NNSA has determined that the information in the Wetlands Assessment does not reflect a significant impact or substantial change to the SWEIS and this NEPA process. The Final Y-12 SWEIS has been revised to include these potential impacts related to the UPF project. The Final Y-12 SWEIS analyzes all reasonably foreseeable potential environmental impacts associated with the construction and operation of the UPF.*

12.T.10 Appendix G

Commentor stated that the wetlands proposal addresses only one small piece of the larger excavation/soil characterization/transport/disposal picture. The wetlands proposal lacks sufficient information on the excavation/soil characterization/transport/disposal plans to permit meaningful comment on those pieces of the UPF construction plans, and is an inappropriate vehicle for addressing issues tangential to the actual impact on wetlands of the Haul Road construction. OREPA recognizes the DOE/NNSA has an obligation to present the public with details on this major action that was not covered in the Draft Y12 SWEIS and to accept comment on those plans, either as part of a reissued Draft Y12 SWEIS or a separate EIS on the UPF.

Response: *The Wetlands Assessment is included in the Final SWEIS as Appendix G and addresses the impacts to wetlands. The SWEIS addresses the larger UPF project impacts (see Section 3.3.2.1.1, which describes the UPF construction, and Sections 5.1 through 5.14, which address the impacts of UPF construction and operation, including the impacts associated with the Haul Road extension and excavation/fill activities). NNSA agrees that the Wetlands*

Assessment is only one small piece of the impacts associated with the UPF construction. The Final SWEIS includes a complete assessment of the UPF construction and operation, including additional changes from the Haul Road extension. NNSA notes that Sections 5.1.2, 5.4.1.2, 5.6.1.2, and 5.8.2 have been revised to consider the impacts associated with the Haul Road extension activities. NNSA disagrees that the construction of the Haul Road extension would result in a significant impact or substantial change to the SWEIS and this NEPA process.

12.T.11 Appendix G

Commentor stated that because the wetlands proposal is apparently intended as an amendment to the Y-12 SWEIS (labeled Appendix G), it is appropriate and necessary that the federal government provide the proposal and an opportunity to comment to all those who submitted comments on the Draft Y-12 SWEIS.

Response: *The Wetlands Assessment was released for public comment by NNSA through the DOE Information Center Web Site and NNSA allowed an 18 day public comment period. Public comments were accepted through July 9, 2010. The Wetlands Assessment is included in the Final SWEIS and the public notice and review process used for the document is consistent with 10 CFR Part 1022. As the impact to wetlands is strictly local, 10 CFR Part 1022 only requires notification to local stakeholders.*

12.T.12 Appendix G

Commentor stated that the Wetlands Assessment is difficult to understand; the descriptions of the Haul Road and the terrain through which it will pass and the wetlands it will impact are difficult if not impossible to understand from the narrative and poor quality photos included, some of which have illegible labels of sites referred to. Putting together a coherent picture of the proposed road, the route, the physical geography, and the proposed changes is impossible from the written description. OREPA believes the public deserves to understand this proposed action and the potential impacts as well as a thorough discussion of alternatives, and we believe this can only happen in a public hearing/public workshop session. We are requesting the DOE/NNSA hold a public hearing to enable the public to clearly understand the nature of this proposal, to ask questions for clarification, and to submit appropriate comments.

OREPA requested a public hearing from the state of Tennessee after reviewing the application submitted to the state which was woefully inadequate (impact on aquatic resources "not assessed"). Though the state has not formally responded to our request, we learned via the newspaper that our request was denied because the comment period had ended (we had learned about the proposal less than one week before the end of the comment period).

OREPA then reviewed the more detailed proposal submitted to the Army Corps of Engineers—this application more closely resembles the DOE/NNSA Wetlands Proposal; it provides much more information than the state permit but, as noted above, also suffers from shortcomings that make it difficult to understand the exact scope and impact of the proposed action. We requested a public hearing from the Army Corps; we were joined in our request by the Tennessee Clean

Water Network and the Foundation for Global Sustainability; we have yet to receive a response from the Army Corps.

Response: *NNSA understands and is committed to the stewardship and protection of its environmental resources. NNSA also encourages any interested public to access and review the complete USACE and TDEC permit application submission packages which are available through the DOE Information Center Website. All wetland permit submittals are technically similar in form and content and have been found to be complete by the TDEC and USACE. They are also similar in form and function to the 10 CFR Part 1022 requirements.*

The proposed Haul Road extension minimizes wetland and undisturbed habitat impacts. A higher quality map is provided in Appendix G. Formal public meetings or hearings through the NEPA process are not required for this Wetlands Assessment. An approved Aquatic Resource Alteration Permit was received from TDEC on June 10, 2010 (TDEC 2010). A final Section 404 Permit from the U.S. Army Corps of Engineers was received on September 2, 2010 (USACE 2010).

12.T.13 Appendix G

Commentor stated that the Wetlands Assessment mentions a concrete batch plant and the excavation of soils in preparation for construction of the UPF. Neither of these issues appeared in the Draft Y12 SWEIS, and the Wetlands Assessment is not an appropriate vehicle for details comments (nor does the proposal provide detailed information). Consideration of the environmental impacts of excavation/soil characterization/transport and disposal as well as the construction of a concrete batch plant must be incorporated in a NEPA process which allows for informed public comment.

Response: *The SWEIS includes an analysis of the impacts of the UPF construction, including soil disturbance, transportation, and disposal. The concrete batch plant, which would be temporary, is a standard piece of construction equipment utilized with very large projects to eliminate traffic on city and county roads and to reduce costs. The construction requirements for the UPF (Table 3.2.2.1-1) include the concrete batch plant and the impacts associated with the batch plant are included in the analysis of impacts in Chapter 5 of the SWEIS. The batch plant would have no impacts on wetlands or aquatic resources. Soil disturbance and disposal is addressed in Section 5.1.2 and 5.5.2. Transportation of soil is addressed in Section 5.4.1.2.*

12.T.14 Appendix G

Commentor stated that the Haul Road proposal indicates the design of the road was modified to minimize wetlands impact, including increasing slope. It would seem this design would also increase pollution from large diesel trucks laboring up a steep hill. The wetlands proposal does not address pollution impacts from extensive and long-term heavy equipment traffic through the wetlands. No mention is made of tailpipe emissions or oil or other fluid leaks which would impact wetlands.

Response: *Short-term air quality impacts of UPF construction are addressed in Section 5.6.1.2. That section has been revised to include consideration of truck traffic associated with UPF construction utilizing the Haul Road extension. The Haul Road extension would be designed according to the acceptable standards of roadway construction. The extension would reduce the transportation distance traveled; thereby reducing the opportunity for vehicle emissions and fluid leaks that would be present on a longer route. The Haul Road extension alignment is intended to avoid wetlands where possible, meeting construction, safety and operational standards. Any petroleum or hazardous material releases would be managed in accordance with regulatory guidelines.*

12.T.15 Appendix G

Commentor stated that the Wetlands Assessment says there will be a discharge of materials into wetlands or "other waterbody." The assessment should be specific about any impacted water bodies.

Response: *The term "other waterbody" has been deleted from the Wetlands Assessment. The Wetlands Assessment now identifies this waterbody as "tributaries of Bear Creek."*

12.T.16 Appendix G

The Wetlands Assessment describes a "buffer zone" to be constructed "when possible." The assessment should make clear who decides what is "possible" as opposed to what is "feasible" and should make clear the factors being considered during the decision-making process.

Response: *Buffer zones are to be identified, established and maintained in areas adjacent to existing wetlands or streams as indicated in the state permit. The purpose of a buffer zone is to maintain erosion control and minimize sediment transport. The size of the buffer zone may be affected by operational requirements, topography, or geological repose; furthermore buffer zones would be routinely inspected and modified as necessary during permit implementation to ensure effectiveness.*

12.T.17 Appendix G

The Wetlands Assessment says that work done within existing wetlands will be done with manual labor to minimize impacts (p.4). This strains credulity—will tons of soil be removed, fill dirt distributed, packed, and paved over using only manual labor? If not, the assessment should include a detailed description of what parts will be manual labor and what will be done with machines and equipment.

Response: *Fill work performed to construct the Haul Road extension would not be done manually. The proposed maximum area of "in stream" or "in wetland" work is approximately 3 acres and will credibly be performed on the scale of minimally invasive, manual labor. The construction requirements for the UPF (Table 3.2.2.1-1) include the Haul Road extension.*

12.T.18 Appendix G

The Wetlands Assessment references dry soil "storage." What does this mean? Is storage temporary or permanent?

Response: *The term "storage" was used to describe locating compatible soils permanently, or until another use is identified, at which time it will be removed from the "storage" area and re-used as needed.*

12.T.19 Appendix G

The Wetlands Assessment describes the consideration of Bear Creek Road as an alternative, but the final statement of rejection does not match up with the considerations listed above.

Response: *Bear Creek Road was considered as an alternative, but eliminated from detailed consideration because the load, number and size of construction vehicles simply cannot be accommodated by Bear Creek road in its current condition. The amount of traffic for both soil relocation and concrete placement would place significant structural loads on the road way and increase traffic significantly. These would be oversized vehicles, not legal or intended for public road use, and would pose a special risk to site traffic on Bear Creek Road. Widening of the existing Bear Creek Road was not considered as a reasonable alternative because: (1) this would have disrupted routine traffic flow of plant personnel; (2) the expected cost would have been equal to or greater than construction of the Haul Road; and (3) relocation of existing utilities would have disturbed existing wetlands, creeks and streambeds. While conventional tractor trailers and other large vehicles use Y-12 roads on a regular basis, the scale of the UPF excavation and earth moving would require Caterpillar 740 type (or similar)"articulated dump trucks."*

12.T.20 Appendix G

The Wetlands Assessment includes a detailed description of the activities undertaken to characterize the wetlands soils, but does not contain, in narrative, summary or table form, the results of those characterization activities.

Response: *The wetland delineation and soil characterization information is contained in detail in the referenced Wetland and Sensitive Species Survey Report for Y-12: Proposed Uranium Processing Facility, November 2009, which is a reference for the assessment. This is also listed in the state Aquatic Resource Alteration Permit application.*

12.T.21 Appendix G

The Wetlands Assessment identifies two species of concern in the areas to be disrupted; roosting habitat for the Indiana bat, and habitat for the Tennessee dace. The proposal says nothing else about them—no description of efforts to address habitat issues or to mitigate impacts for these listed species.

Response: *Habitat and mitigation issues for the Indiana bat and Tennessee dace are described in the draft and final SWEIS (Section 5.8.2, Threatened and Endangered Species). As stated in the Wetlands Assessment, the Tennessee dace was not encountered within the impacted reaches during a February 2010 survey. The assessment acknowledges that trees provide potential roosting habitat for the federally endangered Indiana bat and that Indiana bats utilize such trees for maternity roosts from approximately mid-May through mid-September. While the ORR is within the known range of the Indiana bat, none have been observed at Y-12. More details regarding the Indiana bat and Tennessee dace are contained in the Wetland and Sensitive Species Survey Report for Y-12: Proposed Uranium Processing Facility, November 2009.*

12.T.22 Appendix G

The Wetlands Assessment describes some areas as "primarily man-made.". It is important to note that "primarily man-made" does not equate to "therefore unimportant, inconsequential, or unnecessary." The document notes in other places that human made habitats have existed long enough to have been incorporated by wildlife as important habitat.

Response: *It is agreed that primarily man-made habitats can be important as wildlife habitats. Any implication to the contrary is entirely unintentional.*

12.T.23 Appendix G

The Wetlands Assessment references soil sample analysis and says "no contaminated soil is anticipated." Given the history of environmental surprises on the Oak Ridge Reservation, this statement is meaningless. What's more, it is unnecessarily meaningless. We don't have to guess what the samples might show—we can wait and see what the results are. The Wetlands Assessment provides insufficient information about the sampling process to allow the public to have confidence that the sampling is adequate.

Response: *Characterization of soils excavated and managed for the UPF is proceeding as described in Section 4.0 of the Wetlands Assessment and utilizes MARSSIM (Multi-Agency Radiation Survey and Site Investigation Manual) processes. In planning for the Haul Road and wetland development, no contaminated soil is anticipated. Walk-over radiological surveys have been done and sampling for site characterization is being done according to MARSSIM and EPA requirements. Historical land use is known in the region which lends credulity to the expectation of no contamination. Furthermore, no contamination or other "environmental surprises' have been encountered to date on the project. As discussed in Section 5.5.2 of the SWEIS, soil contamination from project activities would be minimized by complying with waste management procedures DOE Order 435.1, Radioactive Waste Management, and DOE Order 450.1A, Environmental Protection Programs. The potential exists for contaminated soils and possibly other media to be encountered during excavation and other site activities. Prior to commencing ground disturbance, NNSA would survey potentially affected areas to determine the extent and nature of any contaminated media and required remediation in accordance with the procedures established under the site's environmental restoration program and in accordance with appropriate requirements and agreements.*

12.T.24 Appendix G

The Wetlands Assessment says affected streams were checked for the presence of the Tennessee dace in February 2010, which is the dead of winter. The streams must be checked again in summer (most preferable would be an accounting of the presence of dace in each season), and data must be incorporated into the wetlands proposal and made available to the public.

Response: *Stream tributaries on the Oak Ridge Reservation that serve as Tennessee dace habitat are routinely surveyed for Tennessee dace as part of the Reservation's Biological Monitoring and Assessment Program and results are provided to the State of Tennessee. This will continue and additional surveys will be conducted immediately before any in-stream work to identify, capture and relocate impacted aquatic life. The most recent surveys were conducted in February and June, 2010.*

12.T.25 Appendix G

In describing mitigation efforts, the Wetlands Assessment notes that some mitigation efforts are expected to maximize the likelihood of successful mitigation of wetlands, but that others (60%) will not conform to the "important priority in defining appropriate wetlands mitigation" and are less likely to succeed. (You can lead a dace to water, but you can't make it thrive.) This concern should be addresses in detail in the wetlands proposal.

Response: *Final success of the wetland mitigation would be monitored for a minimum of five years by the respective agencies to assure this success, consistent with the requirements of the Aquatic Resources Alteration Permit. The intent of the text in the Wetlands Assessment was to describe issues associated with wetland mitigation, justify mitigation ratios chosen for this project, and obtain a Section 404 Permit from the USACE. The expansion of existing wetlands is expected to result in more rapid development and functional quality than de novo creation of new wetlands.*

12.T.26 Appendix G

The Wetlands Assessment identified 0.51 acres of disturbed wetlands to "comprise valuable wetland and water quality functions for the streams of the Bear Creek watershed." The proposal should describe those functions in detail and also describe how the mitigation measures will sufficiently replace these valuable functions.

Response: *Wetland functions and associated habitat values are discussed in detail in association with specific wetland locations in Appendix G and references.*

12.T.27 Appendix G

The Wetlands Assessment says that portions of Bear Creek "could" be modified, and in the next sentence, that 70 feet of downstream channel "would" be modified. It is not clear what decision-process would determine if the initial "could" be transformed to a "would."

Response: *The proposed stream modifications would be implemented per the approved state permit following the NEPA ROD and project initiation.*

12.T.28 Appendix G

The Wetlands Assessment should include a description of "electrofishing."

Response: *Electrofishing is the use of electricity to stun fish prior to capture. This description has been added to the Wetlands Assessment.*

12.T.29 Appendix G

The Wetlands Assessment makes reference, in its conclusion, to "site access and perimeter modification is also unavoidable in the western footprint of the UPF complex." The antecedent for this reference is not clear, nor is the implication of the statement.

Response: *The statement was intended to describe areas to the northwest of UPF which would be impacted. The maps provided in Appendix G are labeled to more clearly show this area to aid in the readers' understanding.*

13.0 GENERAL SUPPORTING COMMENTS

Commentors expressed support for the Capability-sized UPF Alternative, a UPF, continued operations at Y-12, modernization of Y-12; and/or the Complex Command Center and the HEUMF. The following summarizes the comments received:

- UPF improves safety of personnel and nuclear materials; UPF improves security and a major reduction in the cost of providing that material; UPF improves efficiency and reduces costs; UPF maintains the capability to dismantle components for long-term storage and to provide that material for nonproliferation uses in research reactors, civilian reactors, naval nuclear reactors; UPF maintains the capability to provide or remanufacture weapons components.
- The UPF will be an anchor in the modernization initiative currently underway at Y-12. It is the most effective plan to carry out the on-going and crucial national security missions performed at the Y-12 complex, as well as cleanup of WWII and Cold War legacies.
- The modernization of Y-12 will enable operations to continue in a cleaner, safer, and more secure way to fulfill its historically and nationally vital mission of maintaining peace through strength.
- With the projected savings that are documented for the Y-12 with the UPF, that this particular facility and those cost savings, will pay for itself two or three times over during the 50-year life cycle of the facility.
- The continued operation of Y-12 is critical to the national security of the United States.
- Alternative 5, No Net Production/Capability-sized UPF Alternative is the best option, as it will help in reducing the footprint of Y-12 facility.

- Y-12 is an ideal location for the UPF because of its geographical proximity to ORNL and subsequent easy technical collaboration; availability of experienced technical staff; technology already exists there; and it is vital to the economic health of the area.
- New UPF will allow consolidation of many diverse uranium processing and manufacturing operations.

Response: *NNSA notes these comments.*

14.0 GENERAL OPPOSITION COMMENTS

Commentors are opposed to the construction of any facility in Oak Ridge or anywhere else that could now or, through modifications, in the future produce new nuclear weapons. Reasons given for this opposition include the possibility of a nuclear arms race, concerns about cost, necessity, irresponsibility. Commentors are also opposed to production, proliferation, and use of nuclear weapons, construction of the UPF, the mission of Y-12, any nuclear project, nuclear armament by the U.S. Other commentors stated opposition to all five of the proposed alternatives, as they do not reflect the Administration's vision and plan for nuclear weapons and are not in line with the spirit of the Nuclear Nonproliferation Treaty. Another commentor opposed all options other than Alternative 2 (UPF Alternatives) as they do not provide for the protection and needs of special nuclear materials.

Response: *NNSA notes these comments.*

15.0 OUT OF SCOPE COMMENTS

A commentor submitted four multi-page publications written by other authors as his comment. These documents included "Breaking Faith With Nuclear Weapons" by Faithful Security; a petition from Nuclear Information and Resource Service; a fact sheet from the Union of Concerned Scientists, "New Nuclear Weapons: RRW;" and "Muslim-Christian Study and Action on the Nuclear Weapons Danger," prepared by The Muslim-Christian Initiative on the Nuclear Weapons Danger. Another commentor believes it would be a great benefit to build a similar down-sized facility at the Paducah Gaseous Diffusion Plant after completion of the Oak Ridge facility. A commentor stated that the SWEIS scope should be broadened to prohibit any new sub-critical tests under the guise of the Stockpile Stewardship program, include tracking of off-site contaminants and monitoring of upstream wells, and consider the lives of workers in terms of re-employment instead of maintaining nuclear weapons as a jobs program.

Response: *These issues are beyond the scope of the SWEIS. Additionally, sub-critical tests are not conducted at Y-12.*

15.A EVALUATE USE OF NUCLEAR WEAPONS

Commentors stated that the consequences of using nuclear weapons must be assessed.

Response: *Only the President can authorize the use of nuclear weapons. Accordingly, the use of nuclear weapons is not within the scope of this SWEIS.*

16.0 OTHER

16.A ROD SUGGESTIONS

Commentors stated that since the stockpile can be maintained in a safe, secure and reliable state by Alternative 5, or by a consolidated, down-sized 5 warhead/year production center in an upgraded existing facility, other factors may be determinative as NNSA makes its decision. Commentors stated that in today's economic climate, cost must be a consideration. The safety of workers and the public is also an important consideration. Reliability of the facilities is a further consideration. Ultimately, the changing mission of Y-12 should determine the direction the Y-12 SWEIS sets out for the future. Commentors stated that the ROD should consider the costs for all alternatives.

Response: *The commentor's suggestions regarding the factors that NNSA should consider in the decisionmaking process are noted. NNSA agrees that meeting national security requirements, costs, safety of workers and the public, and reliability are all relevant factors that may be considered. The ROD will explain all factors that NNSA considered in making any decision regarding the SWEIS.*

16.B URANIUM MINING

Commentor stated that the increase in uranium exploration and mining caused by the preferred alternative are an indirect cumulative impact of the facility that must be fully analyzed in the SWEIS.

Response: *None of the alternatives would require any increase in uranium exploration and mining. As such, there would be no impacts from these activities.*