

MY COMMENTS

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

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

Dear Ms. Nelson and NNSA:

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

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

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

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

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

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

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

2. A “Hard Look” at Alternatives is Required

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

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

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

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

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

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

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

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

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

4. Environmental Hazards Must be More Fully Considered

Pit production at the Savannah River Site would produce a host of chemical and nuclear waste streams. The DEIS shortchanges the analysis of their risks. Is dumping of low-level nuclear waste in unlined trenches being considered? Waste containment and management at the Savannah River Site have been problematic; the site was placed on the EPA “Superfund” list in 1989. The final

EIS must comprehensively analyze the impacts of new production alongside the leaking wastes already in the environment.

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

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

Here is my contact information:

Name

Postal Address

Email Address