July 25, 2019

Ms. Jennifer Nelson

NEPA Document Manager

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

Dear SRS EIS NEPA Document Manager,

I respectfully submit these comments as provided for by the National Environmental Policy Act (NEPA) on the scope of issues that the NNSA must address in its draft environmental impact statement for plutonium pit production in the proposed Plutonium Bomb Plant (PBP) at the Savannah River Site (SRS). I also look forward to submitting comments on the draft EIS after its completion.

I request that the public comment period for the draft SRS EIS be extended for 30 days past the current July 25, 2019 deadline.

Especially given that pit fabrication would be totally new to SRS and would be for unjustified new nuclear weapons, I support the “No Action Alternative” of not “repurposing” the failed MOX Fuel Fabrication Facility (MFFF) for conversion into the plutonium Bomb Plant.

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

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

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

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

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

The draft SRS EIS Must Be Completely Free of Predetermination.

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

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

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

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

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

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

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

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

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

Sincerely,

*Name*

*Full address*

*Email*