



**Department of Energy**  
**National Nuclear Security Administration**  
**Office of General Counsel**  
**Washington, DC 20585**



April 21, 2020

Mr. Tom Clements  
Director  
Savannah River Site Watch  
1112 Florence St.  
Columbia, SC 29201

Dear Mr. Clements:

This letter is in response to your April 14 email to the Secretary of Energy, the Administrator of the National Nuclear Security Administration and me. In that email you ask, on behalf of yourself and a number of others, that NNSA extend for an additional 45 days the public comment period on the Draft Environmental Impact Statement for Plutonium Pit Production at the Savannah River Site in South Carolina (hereafter, the Draft EIS). As requested, your email will be placed in the public record for this proceeding, as will this response. I would appreciate if you would distribute this response to the other signatories to your email, as well as to those who you've asked to send individual extension requests using your email as a template.

On behalf of all of the addressees I want to express appreciation for your support for our actions to protect our staff and for your best wishes for their continued health. This is a difficult time for all of us and we likewise hope that you and your colleagues stay healthy.

Although the COVID-19 pandemic presents substantial challenges, NNSA remains charged by the President and Congress with continuing its mission of protecting national security. The proposed pit production projects at Los Alamos and Savannah River are one of our highest priorities in that regard, and we are continuing our preparatory activities at both sites. An important aspect of those preparations is meeting our National Environmental Policy Act responsibilities, which we take very seriously, and we are fully aware that public participation is an important part of the NEPA process. With regard to the Draft EIS we have already conducted the required public scoping activities. We are also proceeding with a public hearing. We will conduct this public hearing in a "virtual" format that will be protective of public health while at the same time providing a meaningful opportunity for public participation. NNSA staff are spending a considerable amount of time and effort to assure that this public meeting will be informative and useful as a forum for public comment.

In evaluating the request for more time to comment it is important to recognize that commenting on this document can be accomplished without the need to disobey social distancing and other pandemic-related precautions. This is what used to be known as a "paper exercise," but which has evolved into one conducted electronically. Your request for an extension of time was submitted electronically, without the need to come to the Savannah River site or otherwise expose yourself to contagion. Similarly, I am sure that you were able to safely conduct preparation and coordination of

your request for an extension of time with your colleagues. Similarly, you and your colleagues can review the Draft EIS electronically and submit comments the same way. The pandemic just doesn't have the same impact on this kind of activity as it does on more "hands-on" actions.

As was true with the comment period for the draft SA for the Los Alamos SWEIS, which you refer to in your email, we are not insensitive to the disruptions caused by the need to adjust to the COVID-19 pandemic situation. And, as in that case, and in accordance with what you refer to as a "precedent for extension of other comment periods being managed by NNSA during the pandemic crisis," we will extend the Draft EIS comment period for fifteen days.

Thank you for contacting us on this important matter. If you have any questions about this, please contact Ms. Nora Khalil, Associate Administrator for External Affairs, at (202) 586-7332.

Sincerely,

*Bruce M Diamond*

Bruce M. Diamond  
General Counsel