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Comments, Updates & Inquiries Welcome

Obstacles and Concerns Related to Department of Energy's "Repurposing" of the Abandoned Mixed Oxide Fuel Fabrication Facility (MOX) at the Savannah River Site (SRS) into a "Plutonium Bomb Plant" to Fabricate Plutonium "Pits" (Triggers) for Nuclear Weapons

- New plutonium pit production at SRS 50 or more per year by 2030 would be not only for new warheads but also for all existing and modified warheads. The Los Alamos National Lab in New Mexico would produce 30 or more pit per year. It appears that DOE intends to maintain 4000 nuclear weapons through this century, not for deterrence but to support a policy based on fighting a nuclear war. Such a large stockpile undermines our security, violates the disarmament provisions of the Nuclear Non-Proliferation Treaty, risks a new nuclear arms race and would cost over \$1 trillion over the next 30 years.
- The entirely new "mission" of pit production at SRS would mean more controversial shipments of plutonium into South Carolina. In 2007, SRS was designated as the site to store surplus non-pit plutonium and currently stores about 12 metric tons of plutonium in the old K-Reactor. If more plutonium comes in and the pit project falters, we would be stuck with this dangerous material, which has with a half-life of 24,000 years.
- Pit production would yield a large amount of low-level nuclear waste that would be dumped into unlined trenches at SRS. DOE's National Nuclear Security Administration estimates pit production would produce a minimum of 7,800 cubic yards per year of LLW. South Carolina doesn't need more nuclear waste created at the site and dumped there.
- NNSA intends to "repurpose" the partially constructed plutonium fuel (MOX) plant for into
 the Plutonium Bomb Plant, at an estimated cost of around \$4 billion. But no engineering
 basis has been presented for such a plan or if the MOX building, with uncorrected
 construction problems, could even be safely converted to pit production. Lead Site
 Contractor Savannah River Nuclear Solutions (SRNS) consortium of Fluor, Honeywell &
 Newport News Nuclear is relying on \$410 million from DOE's \$710 million "Plutonium
 Sustainment" slush fund for pit plant design work in 2020.
- SRS has no experience involving production of plutonium pits or handling of pits. While SRS produced over 36 metric tons of plutonium in 5 reactors until they closed in the late 1980s, SRS shipped that plutonium for pit production to the now-closed, contaminated Rocky Flats Plant in Colorado. Using very few employees, SRS has recently been opening plutonium storage cans for monitoring and downblending for disposal in WIPP and has purified plutonium oxide in the H-Canyon reprocessing plant that project has ended but has no pit production experience. SRS would be on a steep and stressful learning curve, which could set up the pit project for failure, leaving plutonium stranded at SRS.

- NNSA has so far refused to prepare the legally mandated Programmatic Environmental Impact Statement (PEIS) to address the need and impacts of expanded pit production DOE system-wide. A lawsuit by public interest groups on lack of a PEIS is possible.
- Though MOX was always a parochial jobs program for the SRS area, pursuit of pit production to make up for jobs lost by MOX termination is no justification the pit mission at SRS. Thankfully, it appears that the bulk of laid-off MOX workers have been able to find other jobs at SRS and Savannah River Nuclear Solutions has advertised that MOX workers have a preference in hiring. NNSA claims that pit production could employ over 1000 people but those jobs don't now exist so there is no job-loss impact if the project doesn't go forward. Clean-up of waste, which garners SRS about \$1.4 billion per year, is the jobs and funding king at SRS and this is where the focus must stay.
- The Congressional Budget Office's January 2019 Projected Costs of U.S. Nuclear Forces, 2019 to 2028 estimates "about \$9 billion from 2019 to 2028 for expanded pit production capacity, although that estimate is very uncertain." Spending \$1 billion per year at SRS and Los Alamos on pit production an amount likely to escalate based on past DOE performance would place a severe strain on the DOE budget and damage funding for clean-up and better-justified projects.
- Over \$5 billion was wasted on MOX plant construction and possibly \$3 billion more was spent on planning and administration since MOX was conceived in 1995. This massive waste of taxpayer money and the mismanagement of the MOX project by NNSA and contractors looms as indicator of how another large, costly project at SRS will be managed. The MOX debacle begs for congressional investigations. Loss of MOX funding must not be used to justify the hastily planned, unneeded pursuit of yet another complex, costly jobs project that could have the same negative results, and result in huge cost over-runs and significant schedule delays. And, increase the risk of a nuclear arms race.
- In 2020, we urge Congress, especially House Armed Services and House Appropriations Committees, to halt and defund unjustified and provocative plans for pit production. The request of \$440 million for the SRS Plutonium Bomb Plant must be rejected by the Appropriations committees and the Armed Services committees must reject the current requirement that 80 pits per year be produced by 2030.

Contact:

Tom Clements
Director, Savannah River Site Watch (SRS Watch)
1112 Florence Street
Columbia, SC 29201
http://www.srswatch.org/
https://www.facebook.com/SavannahRiverSiteWatch
tel. 803-834-3084, srswatch@gmail.com