



Savannah River Site Watch

**Savannah River Site Watch
Columbia, South Carolina USA**

<https://srswatch.org/>

**For Immediate Release
May 12, 2020**

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Inadequate Los Alamos Lab Environmental Analysis of Plutonium “Pit” Production for 4000 New and Refurbished Nuclear Warheads Must be Amended by DOE to Cover Key Issues Overlooked

Options to “Reuse” Pits and Method to Purify Plutonium are Key Matters Totally Lacking from Draft Supplement Analysis, Raising Legal Questions of Adequacy of NEPA Review

Columbia, SC – The U.S. Department of Energy’s draft environmental review of production of plutonium “pits” (cores) for all new and existing nuclear warheads at the Los Alamos National Laboratory lacks discussion of key issues and a revised document must be prepared, according to the public interest group Savannah River Site Watch.

The environmental review conducted by the DOE’s National Nuclear Security Administration for LANL pit production totally leaves out at least two issues of paramount concern: 1) “reuse” of existing pits in nuclear warheads rather than use of new pits and 2) methods to produce purified plutonium used for pit production. Lacking any discussion whatsoever of these essential issues, the ill-prepared document must be amended and reissued for public comment, according to SRS Watch, based in Columbia, South Carolina.

The comment period on the cursory draft environmental review on expanded “pit” production for new and refurbished nuclear weapons at Los Alamos - the *Draft Supplement Analysis of the 2008 Site-wide Environmental Impact Statement (SWEIS) for Continued Operations of Los Alamos National Laboratory (LANL)* - ended on May 9. In it, NNSA proposed to build new capability at Los Alamos in New Mexico to “begin producing a minimum of 30 pits a year at LANL no later than during 2026.” In an indication that NNSA doesn’t really know what it’s aiming for, the document also “evaluates the potential environmental impacts of producing up to 80 pits per year at LANL.”

“In its headlong and unjustified rush to expand plutonium pit production, NNSA has gotten very sloppy and prepared an inferior environmental document that falls apart under scrutiny,” said Tom Clements, director of SRS Watch. “The bungled draft document must either be discarded or a detailed supplement must be prepared and reopened for comment,” added Clements. “It is well known that NNSA can’t properly manage complex, costly projects and when schedule pressure and disruption from the

coronavirus are thrown in, NNSA and administrator Lisa Gordon-Hagerty are setting things up for a costly plutonium train wreck.”

SRS Watch and other environmental and public interest groups assert no new pit production is necessary and will only be used to fuel a new nuclear arms race. Due to inability to properly handle plutonium, Los Alamos has failed to produce the currently authorized 20 pits per year and there is no evidence it can produce 30 pits or more per year. “NNSA’s blind pursuit of new-design weapons, the W871-1 and W93, and replacement of all pits in almost 4000 active and reserve warheads most likely won’t be accomplished but it can kick off a dangerous nuclear arms race that will undermine national security,” said Clements.

In comments on the draft SA, submitted on May 8, SRS Watch called for amended documents to be produced, with a full discussion of pit reuse and purified plutonium production: “A FORMAL REQUEST is hereby being made for a supplement to the Supplement Analysis or a revised draft SA to be prepared on the issues of 1) reuse of plutonium pits in new and refurbished nuclear warheads and 2) production of purified plutonium for production of new pits. Both issues can be discussed in a single supplement document or a revised or edited supplement to the draft SA released for public comment. These matters are too important and the discussion about them is of such legal significance for them to simply be somehow included in any final SA without opportunity for public comment.”

According to the National Environmental Policy Act, “If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion.” That’s the situation we are now facing, according to SRS Watch.

Additionally, as there are “substantial changes in the proposed action that are relevant to environmental concerns” and “there are significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts,” it is legally required for the draft document to be supplemented or edited and reissued for comment.

Absent preparation of a revised draft on Los Alamos pit production, NNSA’s legal problems in not following the requirements of NEPA will be compounded, according to SRS Watch.

NNSA has also prepared a draft EIS on production of 50 or more pits at the Savannah River Site in South Carolina. NNSA has proposed using a partially built plutonium fuel (MOX) fabrication facility at SRS that was terminated in 2018 after a waste of \$8 billion, a matter demanding investigation into fraud, waste, abuse and mismanagement. Due to a request by SRS Watch and other groups, the comment period on that draft document has been extended until June 2. That document mentions methods of plutonium purification and confirms pit reuse is being considered: “For the foreseeable future, NNSA will rely on a combination of newly manufactured pits and judicious reuse of existing pits to modernize the U.S. nuclear stockpile. This approach enables NNSA to implement a moderately sized pit manufacturing capability of not less than 80 pits per year beginning during 2030.” (page S-4)

SRS Watch, Nuclear Watch New Mexico, Tri-Valley CAREs - all members of the Alliance for Nuclear Accountability (ANA) - and other groups have called on NNSA to first prepare a Programmatic

Environmental Impact Statement (PEIS) before preparing site-specific environmental documents on pit production. According to the groups, the over-arching DOE complex-wide environmental impacts and need for pit production must first be reviewed in the PEIS. “NNSA has shirked its obligation to first prepare the PEIS and is therefore at risk of a legal challenge under NEPA,” according to Clements.

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Notes:

Comments by SRS Watch on draft Supplement Analysis on plutonium pit production at Los Alamos National Lab and request for supplement, sent to NNSA, May 8, 2020:

<https://srswatch.org/wp-content/uploads/2020/05/Comments-on-draft-Supplement-Analysis-LANL-pits-Clements-final-May-8-2020.pdf>

Draft Supplement Analysis (SA; DOE/EIS-0380-SA-06) of the 2008 Site-wide Environmental Impact Statement (SWEIS) for Continued Operations of Los Alamos National Laboratory (LANL):

<https://www.energy.gov/nnsa/articles/public-invited-comment-expanded-plutonium-pit-production-los-alamos-national-0>

Draft EIS on Plutonium Pit Production at the Savannah River Site (SRS) in South Carolina (SRS Pit Production EIS) (DOE/EIS-0541), due to requests by SRS Watch and public interest groups the comment period has been extended 15 days, to June 2:

<https://www.energy.gov/nepa/downloads/doeeis-0541-draft-environmental-impact-statement>

Comments by Nuclear Watch New Mexico to the draft Supplement Analysis, May 9, 2020:

<https://nukewatch.org/lanl-sweis-sa-nukewatch-comments/>

Comments by over 100 groups and individuals to draft SA, May 9, 2020:

<https://nukewatch.org/collective-public-comments-on-lanl-pit-production-5-9-20>

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