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LWV/SOUTH CAROLINA

Dear Ms. Nelson:

The League of Women Voters of South Carolina supports “A No Action Alternative” regarding the construction of plutonium pits at SRS.

If DOE continues to pursue this mission, LWV/SC urges a comprehensive Programmatic Environmental Impact Study (PEIS) of this proposed new pit mission at SRS.

The LWV/SC opposes this proposal to build plutonium pits at the Savannah River Site (SRS) for the following policy reasons:

- (1) The League supports the “No Action Alternative.” The goal of the Nuclear Non-proliferation Treaty (NPT) is to end nuclear weapons development. The LWV/US actively supported the NPT in the 1960s, and continues to do so: “Declaring their intention to achieve at the earliest possible date the cessation of the nuclear arms race and to undertake effective measures in the direction of nuclear disarmament.” For more than three decades the NPT has demonstrated the world’s possibility to control much proliferation. There is no new information to support this proposal. To the contrary, this nation’s interest in “refreshing” weapons systems has stimulated nuclear arms activities in the international community.
- (2) The League of Women Voters/SC has been monitoring the very slow progress in cleanup of legacy wastes at SRS for almost 40 years. These wastes are in 43 old ~Olympic-pool-sized underground tanks. The most recent closure was last December, and the next tank closure seems to be scheduled for 2024. Decades will be required to clean what can be cleaned from these troublesome tanks, and to close what can be closed. This EIS fails to address costs, processes, and schedules for treating the additional wastes to be generated by this competing proposal – which triples some of the existing volumes of untreated legacy wastes currently at SRS. Post-pit cleanup management is not fully addressed.

The EIS is insufficient. If DOE persists, a PEIS for the pit proposal at SRS should address:

- (1) On-site and off-site contamination at other DOE sites charged with this mission, and analyses to avoid such releases at SRS or elsewhere in the future.

(2) Effects on staffing and scheduling of the proposed new mission on current SRS cleanup schedule programs and responsibilities, especially legacy underground tank closures.

(3) A candid assessment of stockpiles of plutonium at all DOE sites and their lifetimes, as judged by independent professionals.

(4) Detailed description, cost, and schedule of safe management and treatment of pits wastes for indefinite storage at SRS until such time as shipment to a suitable federal repository becomes a possibility.

(5) If WIPP disposal is part of the PEIS, how many and which federal facility wastes will be “bumped” to enable both the current planned SRS shipments as well as this proposed new volume of SRS TRU storage at WIPP.

(6) The plan for the future of the newly imported ‘pits’ plutonium if the billions of appropriations necessary to produce pits does not receive sufficient and steady funding by Congress.

(7) Given the difficulty of hiring skilled professional staff and obtaining specialized materials, as demonstrated during the construction of the MOX shell, what is the plan for workforce adequacy over the next 30 years - in a less-than-resilient industrial environment.

(8) Having experienced serious MOX financial and scheduling problems with the similar huge and hurried “design/build/redesign/rebuild...” project, why should DOE not expect similar financial and scheduling problems with this new proposal? Why does DOE assume the MOX shell is in fact suitable for this purpose? Why another hurried project?

Sincerely,

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