

June 2, 2020

Ms. Jennifer Nelson  
NEPA Compliance Officer  
National Nuclear Security Administration  
[NEPA-SRS@srs.gov](mailto:NEPA-SRS@srs.gov)

Subject line: Draft SRS Pit Production EIS Comment

Dear Ms. Nelson:

The organizations listed below endorse and submit the following comments on the [\*Draft Environmental Impact Statement for Plutonium Pit Production at the Savannah River Site in South Carolina\*](#) and ask that these comments be made part of the official record.

We are concerned about the proposal to expand the role of the Savannah River Site (SRS) into the production of plutonium pits. SRS has no experience producing plutonium pits and this new mission will pose serious environmental, health and safety challenges. Pit production at the Rocky Flats Plant facility in Colorado was shut down in 1989 by a raid of the FBI and the Environmental Protection Agency. Pit production at Los Alamos was also forced to stop due to safety and security considerations.

With that in mind, we raise the following issues that need to be addressed in any final EIS:

- Pit production would produce a host of chemical and nuclear waste streams. Would any low-level nuclear waste be placed in unlined trenches at SRS? Do the waste figures in the draft EIS rely on information from earlier documents not related to pit production at SRS? If so, please provide new calculations based on pit production in the abandoned mixed oxide (MOX) plant.
- What impacts would a plutonium fire have on the environment, front-line workers and downwind communities? As you know such a plutonium fire happened in the course of pit production at Rocky Flats. The people of Barnwell, SC and Shell Bluff, GA near SRS are primarily low income, disadvantaged, and people of color. What would happen to them in the event of a fire or accident?
- The United States has 15,000 or more pits in storage at DOE's Pantex site in TX. In addition, the Department of Energy does not have up-to-date, scientifically grounded information on the expected lifetime of plutonium pits. The most recent data from a 2007 JASON report showed pits would last a minimum of 100 years with appropriate care. The primary justification for pit production seems to be to produce new-design nuclear weapons, at great cost and considerable risk. Please discuss the comparative environmental, health, security and monetary risks and costs of producing new pits versus relying on the pits the United States already has.
- The SRS plan would repurpose the MOX plant, on which at least \$5 billion was spent, and which was cancelled due to rising cost estimates and amid allegations of high levels of required re-work due to poor quality construction. Please include a reliable, independently verified cost estimate for this project, and levels of confidence in that estimate.

We support preparation of an over-arching Programmatic Environmental Impact Statement (PEIS) which would examine the need for expanded pit production and the role in program support, pit design, pit production and waste handling at DOE sites across the country, including SRS, Los Alamos, Pantex, Y-12,

the Waste Isolation Pilot Plant, Sandia, the Nevada Nuclear Security Site, and the Kansas City National Security Campus (which supplies non-nuclear components for all nuclear warheads). The PEIS must be completed before the final EIS on SRS pit production or the Supplement Analysis on pit production at Los Alamos are finalized. NNSA's plans for SRS and Los Alamos are inextricably linked and those plans should be reviewed in a single document, a PEIS.

Finally, we support the “no action alternative” whereby the poorly constructed MOX facility would not be converted to plutonium pit production and that this alternative not be linked to pit production at Los Alamos.

Please confirm receipt of these comments to Stephen Young, Washington Representative, Union of Concerned Scientists at [syoung@ucsusa.org](mailto:syoung@ucsusa.org).

Sincerely,

Arms Control Association  
Washington DC

Association of Roman Catholic Women Priests  
Sarasota, FL

Baltimore Nonviolence Center  
Baltimore, MD

Carolina Peace Resource Center  
Columbia, SC

Chesapeake Physicians for Social Responsibility  
Baltimore, MD

Citizens for Alternatives to Radioactive Dumping  
Dixon, NM

Citizen Power, Inc.  
Pittsburgh, PA

Citizens' Resistance at Fermi Two (CRAFT)  
Redford, MI

Columbia Friends Meeting (Quakers)  
Columbia, SC

Columbia Resilience  
Columbia, SC

Don't Waste Arizona  
Phoenix, AZ

Green State Solutions  
Iowa City, IA

Michigan Stop the Nuclear Bombs Campaign  
Detroit, MI

Midlands Group of the South Carolina Sierra Club  
Columbia, SC

Multicultural Alliance for a Safe Environment  
Albuquerque, NM

Mutual Aid Midlands  
Columbia, SC

National Nuclear Workers Nuclear Workers for Justice (NNWJ)  
Portsmouth, OH

North American Water Office  
Lake Elmo, MN

Nuclear Age Peace Foundation  
Santa Barbara, CA

Nuclear Watch New Mexico  
Santa Fe, NM

Nuclear Watch South  
Atlanta, GA

Nukewatch  
Luck, WI

On Behalf of Planet Earth  
Watertown, MA

Peace Action  
Silver Spring, MD

Physicians for Social Responsibility  
Arizona Chapter  
Tucson, AZ

Physicians for Social Responsibility  
Florida  
Tampa, FL

Physicians for Social Responsibility  
Kansas City  
Kansas City, MO

Physicians for Social Responsibility  
San Francisco Bay Area Chapter  
San Francisco, CA

Physicians for Social Responsibility  
National Headquarters  
Washington, DC

Physicians for Social Responsibility  
Western North Carolina Chapter  
Asheville, NC

Portsmouth/Piketon Residents for Environmental Safety and Security (PRESS)  
Portsmouth, OH

Prevent Nuclear War Maryland  
Baltimore, MD

Rachel Carson Council  
Bethesda, MD

Safe Energy Rights Group (SEnRG)  
Peekskill, NY

Savannah River Site Watch  
Columbia, SC

Stimson Center  
Washington, DC

San Luis Obispo Mothers for Peace  
San Luis Obispo, CA

Southwest Research and Information Center  
Albuquerque, NM

Toledo Coalition for Safe Energy  
Toledo, OH

Tri-Valley CAREs  
Livermore, CA

Union of Concerned Scientists  
Cambridge, MA

Vermont Yankee Decommissioning Alliance  
Montpelier, VT