

Savannah River Site Watch

September 22, 2020

To: SRS Citizens Advisory Board, Comment for Record of September 21, 2020 meeting

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Request of CAB to Closely Monitor Plutonium Issues at SRS – Large Amount Set to Come in with Risks of Environmental Issues, Possibility of being Stranded (like Plutonium Imported for Bungled MOX Project)

DOE, State of South Carolina Agree on Paper to Remove a Total of 9.5 Metric Tons of Plutonium from Savannah River Site – But Total Amount of Plutonium at SRS is Now 11.5 MT and DOE Plans to Bring in ~35 Metric Tons More for Processing for Disposal (via "Dilute & Dispose") and for Unjustified Fabrication into "Pits" for Nuclear Warheads in Proposed, Unneeded SRS Plutonium Bomb Plant (PBP)

Columbia, SC – The U.S. Department of Energy and State of South Carolina signed a "settlement agreement" in late August 2020 concerning removal of 9.5 metric tons of plutonium from the Savannah River Site. While it might sound good on the surface, the agreement is lacking in many ways, including:

- 1. It does not address an additional 2 metric tons of plutonium stored in the K-Area at SRS,
- 2. It does not provide any funding for SRS plutonium management or removal projects, and
- 3. It does not address any aspect of an additional ~35 metric tons of plutonium possibly destined for SRS, for the "dilute and dispose" project and for plutonium pit production for nuclear weapons in the proposed and unjustified SRS Plutonium Bomb Plant (PBP).

Currently 11.5 metric tons of plutonium are stored in the old K-Reactor at SRS. Previously, a decision was made by DOE to "downblend" 6 metric tons of that surplus weapons plutonium as waste. On Friday, August 28, 2020 DOE issued a decision to downblend an additional 7.1 metric tons of plutonium, all for disposal as waste in the Waste Isolation Pilot Plant in New Mexico. While this may sound good, SRS lacks downblending capacity and there is no schedule for the removal of the plutonium from SRS. Plus, WIPP lacks capacity for all the plutonium and TRU waste scheduled to go there. DOE must immediately reveal the detailed plan for processing of the plutonium at SRS and the schedule for its import and removal.

While DOE and the State of SC may gloat over the plutonium-removal announcement - linked in "notes" below - the behind-the-scenes plan to bring in a massive amount of plutonium for processing as waste and for fabrication into pits for nuclear weapons is troubling for us and merits close scrutiny by the SRS Citizens Advisory Board and the public. The mismanaged plutonium fuel (MOX) project resulted in plutonium being stranded at SRS and we do not want a repeat of that \$8-billion boondoggle.

As DOE plans to dispose of 34 metric tons of plutonium as waste, approximately 27 more tons of plutonium would be brought into South Carolina for downblending. Likewise, as DOE is pursuing an unjustified Plutonium Bomb Plant at SRS to make pits for nuclear weapons, that facility would require about 7.5 metric tons of plutonium to make about 2500 pits. This is to maintain a nuclear stockpile to fight a full-scale nuclear war and not just for a deterrent force. If those plutonium-processing projects falter, some of the plutonium brought here could end up being stranded as we saw with the failed MOX project. It is imperative that DOE immediately present a timetable for plutonium shipments to SRS, shipments out of the site and reveal where all this plutonium would be purified prior to processing at SRS.

SRS Watch has called for preparation of Programmatic Environmental Impact Statements (PEISs) on the plutonium disposition and pit fabrication projects. (See SRS Watch letter to DOE of August 11, 2020 linked below.) Those PEIS documents would analyze all DOE system-wide environmental and health impacts, the need for the projects and inform South Carolinians of details about DOE's plan to import a massive amount of plutonium to SRS. I ask that the CAB request of DOE a full accounting of plutonium planned to be brought to SRS and support the PEIS on plutonium disposition, a document originally requested in April 2020 by the plutonium disposition panel of the National Academies of Sciences.

SRS operated five nuclear reactors from the early-1950s to the mid-1980s, which produced about 36 metric tons of weapon-grade plutonium. Another 67 MT of plutonium were produced at DOE's Hanford site in Washington State. Plutonium has a half-life of 24,000 years and thus poses daunting challenges.

Thank you to members of the CAB for your interest in plutonium issues at SRS and for your service!

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Notes:

Federal Register notice, August 29, 2020, to dispose of an additional 7.1 MT of plutonium as waste: https://www.govinfo.gov/content/pkg/FR-2020-08-28/pdf/2020-19023.pdf

Supplement Analysis for Disposition of Additional Non-Pit Surplus Plutonium, August 29, 2020: https://www.energy.gov/sites/prod/files/2020/08/f77/eis-0283-sa-04-spd-2020.pdf

Letter to DOE by SRS Watch, August 11, 20202 calling on a Programmatic EIS (PEIS) on the overall plutonium disposition program, which remains in some chaos: https://srswatch.org/wp-content/uploads/2020/08/Letter-SRS-Watch-to-DOE-on-need-for-PEIS-on-plutonium-disposition-August-11-2020.pdf

Filing with federal appeal court of motion by DOE and the State of SC, July 30, 2020, agreeing to negotiate a settlement on plutonium removal: https://srswatch.org/wp-content/uploads/2020/08/motion-staying-proceedings-to-Aug-31-case-19-2324-July-30-2020.pdf

Court approval of the motion by DOE and the State of SC, August 4, 2020: https://srswatch.org/wp-content/uploads/2020/08/motion-granted-contiuing-case-until-August-31-2020-dated-August-4-2020.pdf