

Savannah River Site Watch

October 21, 2020

To: SRS Citizens Advisory Board, Comment for Record of October 26, 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. (See FOIA document linked below.) 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 it may be assumed that all new plutonium coming into SRS will be processed and leave the site that assumption may not bear out in reality, as we saw with plutonium imports for MOX.

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 again want to be left "holding the plutonium bag."

As NNSA plans to dispose of an additional 34 metric tons of plutonium as waste, approximately 27 or 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 (@3 kg Pu/pit). This is to maintain a nuclear stockpile to fight a full-scale nuclear war and is not 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, a schedule for processing the plutonium, a schedule for shipments off the site, reveal where all this plutonium would be purified prior to processing at SRS and reveal how legally constrained WIPP volumes will be dealt with. Additionally, DOE must state which plutonium is under management by EM and NNSA.

SRS Watch has called for preparation of Programmatic Environmental Impact Statements (PEISs) on both 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 monitoring plutonium issues at SRS and for your service!

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DOE one-page memo on amount of plutonium at SRS: 2020 Savannah River Site Plutonium Inventory Update — obtained by SRS watch via FOIA request https://srswatch.org/wp-content/uploads/2020/09/plutonium-inventory-SRS-2020-FOIA-rcvd-Sep-22-2020.pdf

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