



Alliance for Nuclear Accountability

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A national network of organizations working to address
issues of nuclear weapons production and waste cleanup

7 December 2018

U.S. Department of Energy
National Nuclear Security Administration
NNSA Administrator Lisa Gordon-Hagerty
1000 Independence Ave., SW
Washington, DC 20585

Dear Ms. Gordon-Hagerty:

The Alliance for Nuclear Accountability (ANA) is a longstanding network of more than thirty organizations around the country. A unique feature of ANA is that many of its member groups are located in communities adjacent to, downwind or downstream from major Department of Energy sites, including those of the National Nuclear Security Administration (NNSA).

We write to remind NNSA of its obligation under the National Environmental Policy Act (NEPA) to conduct a fresh Programmatic Environmental Impact Statement (PEIS) on its current plan to reinstate industrial-scale plutonium pit production in the United States at the rate of 80 or more nuclear weapon cores per year using two locations, the Los Alamos National Laboratory (LANL) in NM for at least 30 pits/year and the Savannah River Site (SRS) in SC for at least 50 pits/year. As you recognize, this would constitute a new mission for SRS, which has never before produced plutonium pits.

As the network stated in its most recent DC Days materials, given to DOE and NNSA in May 2018: "Production above 20 pits per year and production at a second site will require nationwide public review under the National Environmental Policy Act. Taxpayers should demand an explanation for costly, provocative, expanded plutonium pit production and should insist that speculative new-design nuclear weapons driving pit production be canceled."

ANA has a three-decades long history of providing expert and public comment on U.S. pit production activities, including through various NEPA review processes.

The present production limit of 20 plutonium pits/year at LANL was established through a PEIS on Stockpile Stewardship and Management (SSM) and codified in a Record of Decision (ROD) in 1996.

ANA feels strongly:

- (1) If NNSA were to conduct a lesser environmental review for expanded pit production (now involving two locations), that decision would violate a plain reading of NEPA. Also,
- (2) The proposal in the SSM PEIS was substantially distinct from the current plan, and the analysis on which it relied for its 1996 ROD is out of date by any standard.

The NEPA process begins when a federal agency, such as NNSA, develops a proposal to take a major federal action as defined at 40 CFR 1508.18. In fact, this has happened already. NNSA announced its plan in May 2018, and is beginning to undertake steps toward it.

NEPA requires that the appropriate level of review (a PEIS) take place early in the agency process, before NNSA actions might limit the choice of reasonable alternatives, prejudice the ultimate decision, or involve irreversible or irretrievable resources.

To recap, eighty plutonium pits/year is significantly more than 20/year, and the NNSA plan involves unexamined health, safety and environmental risks as well as financial costs. Further, the proposal would create a new mission at SRS and would involve newly created wastes and other consequences that would likely impact other sites in the nuclear weapons complex.

A PEIS, undertaken now, is required. The public must be given a full set of opportunities to provide input and participate in the decision-making process. Finally, if NNSA decides at the end of the PEIS to proceed with its current plan, site-specific environmental reviews will also be required.

ANA requests a written response within 30 days. We stand ready to answer any questions you may have.

Sincerely,

A handwritten signature in black ink that reads "Ralph Hutchison". The signature is fluid and cursive, with a long horizontal stroke at the end.

Ralph Hutchison
President, ANA Board of Directors

cc: Sen. Lamar Alexander, Senate Energy and Water Appropriations Subcommittee
Sen. Dianne Feinstein, Senate Energy and Water Appropriations Subcommittee
Sen. Tom Udall, Senate Energy and Water Appropriations Subcommittee
Sen. Lindsay Graham, Senate Armed Services Committee
Sen. Martin Heinrich, Senate Armed Services Committee
Rep. Adam Smith, House Armed Services Committee
Rep. Mac Thornberry, House Armed Services Committee
Rep. Jim Cooper, House Armed Services Committee
Rep. Ben Ray Lujan, NM-3
Rep. John Garamendi, House Armed Services Committee
Mr. Bruce Diamond, NNSA Office of the General Counsel
Mr. Charles Verdon, NNSA Deputy Administrator for Defense Programs
Mr. Brian Costner, DOE NEPA Office
Ms. Nicole Nelson-Jean, Manager, NNSA Savannah River Field Office
Mr. Steve Goodrun, NNSA Los Alamos Office