



Savannah River Site Watch

**Public Comment to Nuclear Advisory Council, April 29, 2024**

**By Tom Clements, Director, Savannah River Site Watch**

<https://srswatch.org/> & listen to the Ploughshares podcast Nuke Talk about SRS, on May 1:  
<https://www.ploughshares.org/nuke-talk>

This is a comment for the official record of the meeting about the role of the Nuclear Advisory Council (NAC) as included in H 5118, the “South Carolina Ten-year Energy Transformation Act,” with a focus on challenges facing the proposed plutonium pit plant - for new nuclear warheads - at DOE’s Savannah River Site.

The bill states that the role of a reformed Nuclear Advisory Council, amongst other things, is “to engage stakeholders and develop a strategic plan to advance the development of advanced nuclear generation including small modular reactors, molten salt reactors, and spent nuclear fuel recycling facilities to serve customers in this State in the most economical manner at the earliest reasonable time possible.”

To give a formal role to the Nuclear Advisory Council in promotion of speculative and risky nuclear projects is a bad idea that could bring harm to the citizens of South Carolina. The first “small modular reactor” was canceled in November 2023, “advanced reactors” are simply concepts, and the reprocessing of spent fuel, for which there is absolutely no demand and no need, has repeatedly been shown to be a costly idea that magnifies nuclear waste and nuclear-non-proliferation concerns (as it separates weapon-usable plutonium from spent fuel and creates a vast by-product liquid high-level nuclear waste stream). As I presented in testimony to the House’s Committee on Labor, Commerce and Industry, that the Nuclear Advisory Council has a poor record in promotion of ill-conceived nuclear projects that have damaged our state is being overlooked.

I refer to the council’s consideration over almost a decade of two misguided projects that were terminated at a loss of a huge amount of money to the rate payer and tax payer: the VC Summer nuclear reactor construction debacle and the U.S. Department of Energy’s plutonium fuel (MOX) boondoggle at the Savannah River Site. With both of those projects, despite repeated warnings from citizens, the council never asked hard questions or adequately probed into what was going on. The council put itself in the embarrassing situation of supporting those projects as they unraveled and finally fell totally apart and were terminated. I don’t recall that the council ever apologized for its poor judgement or held meetings to review what went so badly wrong. Just as with DOE and Congress, those bitter lessons were unfortunately swept under the rug by the council.

Around \$5 billion was wasted on construction of the MOX project and about \$9 billion was wasted on construction of the two new nuclear reactors at VC Summer. According to a Office of Regulatory Staff (ORS) document I obtained in March 2024 via a Freedom of Information Act request, Dominion customers are now paying 5.6% of the monthly bill on the VC Summer debacle and we’ll pay another 15 years. (See SRS Watch news from March 25, 2024, with link to the ORS document: <https://srswatch.org/wp-content/uploads/2024/03/SRS-Watch-news-energy-bill-March-25-2024.pdf>)

Concerning the proposed SRS Plutonium Bomb Plant, we see that the same debilitating pattern has developed in the council’s not asking hard questions or delving behind what DOE’s National Nuclear Security Administration or the lead contractor, Savannah River Nuclear Solutions, are saying about the proposal. The NAC is inadequately considering the following things concerning the SRS pit plant:

- DOE has admitted in the proposed Fiscal Year 2025 budget request and in testimony by the NNSA administrator that the unofficial cost for the SRS pit plant has soared to an estimated cost of \$25 billion. Given that \$5 billion has already been sunk into the MOX building - which may soon be converted to the pit plant - this means that the cost of this single building has soared to about \$30 billion, making it likely the most expensive building in U.S. history. The cost will likely rise. On April 18, NNSA Administrator Jill Hruby revealed her nervousness about that and the cost of new pit production in a speech to the Strategic Weapons in the 21<sup>st</sup> Century Symposium (<https://www.energy.gov/nnsa/articles/nnsa-administrator-jill-hruby-remarks-strategic-weapons-21st-century-symposium>).
- NNSA has chosen not to present any new information about problems with aging of plutonium pits and continues to withhold information about the ability to reuse pits. In a heavily redacted document recently obtained by SRS Watch via a Freedom of Information Act request that languished for almost 3 years - *Research Program Plan for Plutonium and Pit Aging* (linked on SRS Watch website at <https://srswatch.org/nnsa-delays-urgent-research-on-plutonium-pit-aging-heavily-redacted-plutonium-pit-aging-plan-to-congress-obtained-via-tardy-doe-foia-response>) - NNSA concedes it is making decisions on new pit production without making sure that it has adequate information about pit aging or pit reuse.
- SRS has lost all knowledge about handling liquid plutonium since the 5 military reactors were shuttered in the mid-1980s. We citizens, I might add, conducted a successful campaign over 30 years ago to stop their restart. Who expects a few workers to bring knowledge to SRS about plutonium handling and pit production from the troubled Los Alamos National Lab without serious challenges being created? The Defense Nuclear Facilities Safety Board (DNFSB) is thankfully monitoring design of the SRS Plutonium Bomb Plant and appears more concerned than DOE about potential health and environmental issues.
- NNSA is rushing into pit production at SRS without conducting any “lessons learned” analysis of the mismanagement of the MOX project by NNSA and contractors and the endless list of construction problems, about which we heard many, many times in confidence from workers. FOIA requests by SRS Watch reveal that NNSA did not review the problems with the MOX project but conducted lessons-learned reviews only about project closeout. Likewise, Congress has been AWOL In its review of the MOX debacle. (See FOIA response to SRS Watch on lessons learned – scroll down a bit: <https://srswatch.org/savannah-river-site-watch-document-library/savannah-river-site-watch-freedom-of-information-act-documents/>)
- While DOE has been mandated to produce 80 plutonium pits by 2030 - but there is no legal requirement for SRS pit production - which it admits won’t happen, we obtained a document via a FOIA request - <https://srswatch.org/wp-content/uploads/2023/01/Doc-1-SRPPF-CD-1-IPR-Final-Report-210505-2.pdf> - that revealed that the SRS pit plant wouldn’t start until 2034. NNSA then admitted that and now says 2035 or later is more likely the SRS pit plant start date. Such delays will make the cost spiral, which pleases contractors, but this could be a sign that the project will suffer the fate of the MOX boondoggle.
- Pits are for new nuclear warheads - the W87-1 for an ICBM missile and the W93 for a SLBM - yet few questions are being asked about how those weapons contribute to a new nuclear arms race. Likewise, NNSA makes the claim that 4000 warheads are for “deterrence” but it’s clear that such a massive stockpile is really for fighting a full-scale nuclear war and not simply for deterrence.
- Finally, I remind you that three non-profit organizations, SRS Watch, Nuclear Watch New Mexico (Santa Fe, NM) and Tri-Valley CAREs (Livermore, CA) - all members of the Alliance for Nuclear Accountability (ANA) - have a NEPA lawsuit on pit production and are requesting a full programmatic environmental impact statement (PEIS) on pit-production impacts at all DOE sites, including an analysis of disposition in WIPP of transuranic waste from pit production. We have a key filing due on May 3, 2024, which our lawyers, the South Carolina Environmental Law Project (SCELP) will again brilliantly handle. Stay tuned for next steps, including a possible hearing in federal court here in Columbia, SC.

Thank you for this brief period of time to comment about critical nuclear issues in South Carolina and for making this comment a formal part of the record of this meeting.