

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
AIKEN DIVISION

SAVANNAH RIVER SITE WATCH, TOM )  
CLEMENTS, THE GULLAH/GEECHEE SEA )  
ISLAND COALITION, NUCLEAR WATCH )  
NEW MEXICO, and TRI-VALLEY )  
COMMUNITIES AGAINST A RADIOACTIVE )  
ENVIRONMENT, )

Plaintiffs, )

v. )

UNITED STATES DEPARTMENT OF )  
ENERGY, JENNIFER GRANHOLM, in her )  
official capacity as the Secretary, The )  
NATIONAL NUCLEAR SECURITY )  
ADMINISTRATION and JILL HRUBY, )  
Administrator, )

Defendants. )

No. 1:21-cv-01942-MGL

**DECLARATION OF NNSA  
DEPUTY DIRECTOR OF THE  
SAVANNAH RIVER  
ACQUISITION AND PROJECT  
MANAGEMENT OFFICE, BRIAN  
SCHEPENS, IN SUPPORT OF  
DEFENDANTS' JOINT REPLY  
ON ALTERNATIVE REMEDIES**

I, BRIAN SCHEPENS, the Deputy Director of the Savannah River Acquisition and Project Management Office, declare the following:

If the Court were to vacate the November 2020 SRS EIS ROD and enjoin construction of the Savannah River Plutonium Processing Facility (the "Project") while NNSA prepared additional NEPA analyses (which could take approximately 18 months) these significant disruptions would follow:

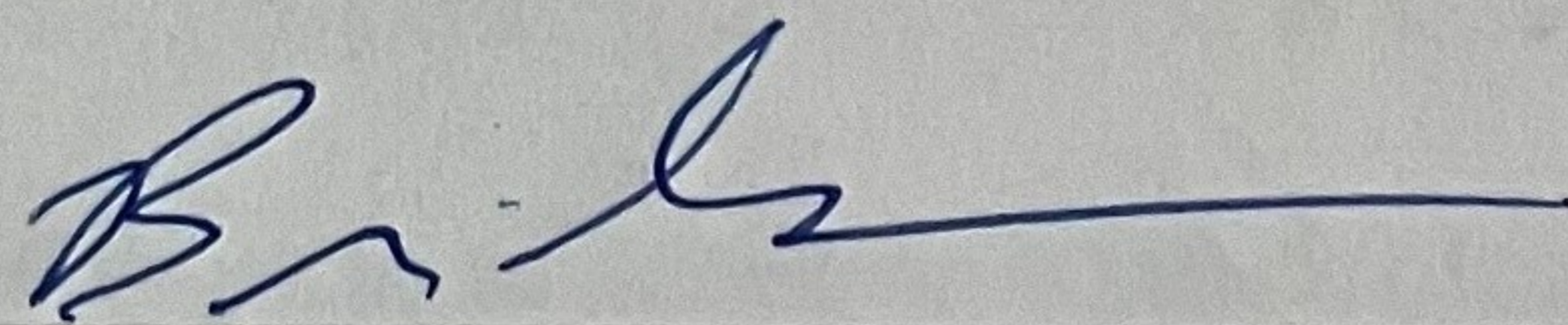
1. The completion of the Project would slip by at least five (5) years, further frustrating Congress's command to produce 80 pits per year by 2030 (50 U.S.C. 2538a, as amended), and imperiling the national security mission to maintain a dependable nuclear arsenal;
2. Roughly 1,400 people who have been hired to work on the Project would immediately be

terminated. Moreover, given the significant delay to re-hire (up to two years), the ill-will associated with a mass layoff, and the uncertainty of additional potential litigation (which could lead to additional delays and additional potential layoffs), contractors and subcontractors working on the Project will lose the knowledge and expertise of many employees who were carefully selected to work on this critical mission. The loss of this human capital will detrimentally impact both design, construction, and production;

3. To stop and re-start the Project would cost the American taxpayer approximately three billion dollars (\$3,000,000,000) more than the current estimated costs to complete the Project.
4. To stop and re-start the Project would also adversely impact the local, regional, and national economies by roughly six and a half billion dollars (\$6,500,000,000); and,
5. NNSA would face the reimbursement of significant litigation costs for the termination of existing employment and construction contracts, including the cancellation of approximately \$1.5B in subcontracts. Many of these subcontracts are small business manufacturers across the United States, whose continued existence may be threatened if the existing subcontracts are terminated and not reinstated for almost two years.

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed this 22d day of August, 2024.



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Brian Schepens  
Deputy Director, Savannah River Acquisition and  
Project Management Office