Savannah River Site Watch

May 5, 2026

Comments on Draft Programmatic Environmental Impact Statement (PEIS) for Plutonium Pit Production (DOE/EIS-0573 - https://www.energy.gov/nepa/articles/doeeis-0573-draft-environmental-impact-statement-april-2026) - at PEIS Meeting in N. Augusta, S.C., May 5, 2026

The following comments are submitted for the PEIS record by Tom Clements, Director, Savannah River Site Watch (SRS Watch, www.srswatch.org), Columbia, S.C.

First, it is noted that the draft PEIS does accurately acknowledge the role of public-interest plaintiffs in a federal environmental lawsuit that secured the PEIS. Thus, preparation of the PEIS by DOE's National Nuclear Security Administration (NNSA) was in some sensed forced on a reluctant NNSA by the public, via a successful federal court case. (For more information, see SRS Watch post of October 3, 2024: *Major Victory on Plutonium Pit Production! "Court Rules U.S. Nuclear Weapons Production Plan Violates Federal Law."*)

But that court case, in more than one place, is incorrectly referred to in the draft PEIS as "Savannah River Watch et al. v. United States Department of Energy." My organization's name is thus not correct and should be "Savannah River Site Watch." For the record, the full listing of the plaintiffs, with the South Carolina Environmental Law Project (SCELP) as our lawyers, includes non-profit organizations and me as an individual. Here are all the plaintiffs, as named in court documents: "Savannah River Site Watch, Tom Clements, The Gullah/Geechee Sea Island Coalition, Nuclear Watch New Mexico, and Tri-Valley Communities Against a Radioactive Environment."

NNSA's preparation of the PEIS is stipulated in the court-approved "settlement agreement" between NNSA and plaintiffs, dated January 16, 2025, beginning with item number 1: "The DOE and the NNSA will conduct a new PEIS to address all of the deficiencies identified by the Court."

Draft PEIS Omits Troubled History with Pit Production at Rocky Flats & Other DOE Sites

As there is concern that plutonium accidents such as those what took place at the now-closed Rocky Flats Plant near Denver, Colorado could occur at any new pit-production facility, it's problematic that Rocky Flats and what can be learned form the bad situation there is omitted in the draft PEIS.

I request that a review of Rocky Flats plutonium accidents and fires be included in the PEIS. Though plutonium handling procedures and equipment may be more modern and effective in the pit facilities

now being considered, if a plutonium accident or fire were to occur, the results, in a bad scenario, could be similar as to what happened at Rocky Flats, including worker, on-site and downwind plutonium contamination.

To get a better understanding about what happened at Rocky Flats, a new film provides some insight: *Half-Life of Memory: America's Forgotten Atomic Bomb Factory.* Details about the movie can be found at www.halflifeofmemory.com. An informative book which describes living near Rocky Flats and the site's impacts is, *Full Body Burden*, by Kristen Iversen.

Also, the draft PEIS does not take into consideration the scope of all sites involved in pit production. The NNSA must account for pit-design, pit-production, supply of non-nuclear components and waste-disposal impacts - including at the existing Lawrence Livermore National Lab (California), the Kansas City Nuclear Security Campus Missouri), the Waste Isolation Pilot Plant (WIPP, New Mexico), Pantex (Texas) and the Nevada Nuclear Security Site (northwest of Las Vegas, NV).

Equipment to Go into Pit Plant

On April 21, 2026, plaintiffs in the federal lawsuit that yielded the PEIS toured the building proposed to be retrofitted into the SRS Plutonium Bomb Plant (SRSPBP), per the above-mentioned settlement agreement. On that tour it was clear that a massive amount of equipment will be squeezed into the building, including hundreds of gloveboxes, if the project goes forward. (See SRS Watch observations about the pit plant tour, posted April 22, 2026: https://srswatch.org/wp-content/uploads/2026/04/talk-about-SRS-pit-plant-tour-for-April-22-2026-briefing.pdf)

Please discuss in detail in the final PEIS exactly what equipment will go into the pit plant - such as gloveboxes, furnaces, melters, plutonium storage and handling equipment, HVAC equipment and piping and wiring - and discuss the environmental impact of the production and purchase of all such equipment. Please discuss any environmental impacts or issues that might be associated with the functioning on later installation of long-lead equipment, such as gloveboxes, purchased and stockpiled now but not installed for many years. It was a real problem at the terminated MOX project, that purchased and stored equipment would have been antiquated by the time it was placed into operation. Some SRS pit-plant equipment may sit in storage or an inoperative state for up to a decade after it was purchased, perhaps impacting intended function or resulting in greater impacts than equipment newly fabricated and placed into operation shortly before use.

Time Period of Pit Production Unclear

The draft PEIS states "For analytical purposes, this PEIS evaluates potential impacts of continuous pit production over the next 50 years—through approximately 2075."

Obviously, the rate of pit-production analyzed in the draft PEIS, 80 to 205 pits per year, will not be happening at the time when the Record of Decision is made. For SRS, the document seems to analyze impacts beginning in the year 2035 but no firm date is given for the start of the SRS pit plant. NNSA

presents in the "Weapons Activities" volume of the DOE Fiscal Year 2027 budget request (https://www.energy.gov/documents/doe-fy-2027-volume-1-wa) that the SRS pit plant would be "operational" in 2035, but this date is speculative and far from firm. Some have said the SRS facility, if it proceeds, would not be operational until 2036 or later.

If the SRS pit plant were to start in 2035, this means that the draft PEIS analyzes 40 years of that facility's operation and not 50 years, as the end of the impact-review is 2075. But, does NNSA anticipate operation at SRS and/or LANL beyond 2075? If so, what are post-2075 impacts? Such post-2075 impacts should be discussed in the PEIS. Post-2075, other issues, such as facility age and condition of equipment enter into the picture.

It is unclear if needed site-support activities at SRS will be present, funded and operating to 2075 or beyond. For example, will waste and transport support facilities and utilities such as water and electricity still be functioning as needed?

If the SRS pit plant were ever to approach operation in the 2030s or later, a supplement to any final PEIS will be called for before it actually begins operation.

Additionally, the NNSA should expand the impact radius beyond a 50-mile radius to account for worst-case scenarios such as plutonium fires. Please explain why a 50-mile radius was chosen. And, the NNSA must account for the cumulative impacts of discharged chemicals in the environment

Deterrence or Not?

The draft PEIS uses the word "deterrence" as a basis for new pits but "deterrence" is not defined. It appears that the word deterrence is being used to justify any level of pit production, including 205 pits per year. Such a level of production is far above any level needed for some definitions of deterrence and implies that they will be used for new warheads and new weapons designed to stimulate a new nuclear arms race.

As NNSA says the pit production would run until 2075 or beyond, please explain what warheads will receive new pits over the next 50 or more years. For 40 years of operation of both pit plants - starting in 2035 and running to 2075 - at a level of 80 pits per year, over 3200 pits could be made and at a level of 205 pits per year more than 8000 pits would be made. This does not count LANL production before 2035. For what purpose? Would some of these pits replace pits in existing warheads or are they all for new warheads? And, please include a detailed discussion about pit reuse.

As pits can have a lifetime of 100 or more years, as reported by the JASON study in 2006, and the average age of a pit is now on the order of 40 years, no new pits will be needed by 2075. If a focus is put on pit reuse and not production of new pits the whole pit project would be rendered unnecessary.

To underscore how confused NNSA appears on the deterrence issue can be seen in an article the *SRNS Today* publication of April 2026 (at

https://www.savannahrivernuclearsolutions.com/docs/SRNS%20Today%20April%202026-EMAIL.pdf), where new deterrence terms are seemingly invented to justify new pits and new warheads:

NNSA Principal Deputy Administrator Scott Pappano makes first visit to SRS

THE NNSA PRINCIPAL DEPUTY ADMINISTRATOR, Scott Pappano, toured SRS for the first time on March 31, seeing firsthand the role the Site plays in national security. Pappano began his visit by meeting with Site leadership from both NNSA Savannah River Field Office and SRNS. He then addressed federal site employees at an All-Hands meeting, saying, "There is a lot of work going on here at Savannah River to support our ***defensive and offensive deterrence*** *missions. And you're doing both of those things here on-site. In these uncertain times, the most stabilizing thing we can do is deliver* ***strategic deterrence****, which is why you and the rest of the Labs, Plants and Sites in the NNSA play such a critical role. Thank you for your service in support of these missions, which is fundamentally the most important thing that we do. Keep doing great things."*

Just what are "defensive and offensive deterrence" and "strategic deterrence?" Are these undefined terms the ones that embody the "deterrence" mentioned in the draft PEIS? As presented in the S*RNS Today* article and in the PEIS, it appears that "deterrence" is actually rearmament and war preparation and not simply to simply deter an opponent from certain action or nuclear weapons use.

Low-Level Waste Disposal

Generation of more nuclear waste that stays in the state is of concern to South Carolinians. One type of waste that will mostly remain at SRS is so-called low-level radioactive waste.

Concerning low-level radioactive waste (LLW) generated by the SRS pit plant the draft PEIS says:

The volume of LLW that would be generated, coupled with the long lifespan planned for the SRPPF, would represent an increase in current LLW management planning levels. The existing LLW disposal area (within E Area) would have to be expanded at some point if it were to accommodate the SRPPF LLW, and onsite disposal would be contingent upon the waste meeting the disposal facility's waste acceptance criteria and adherence to the associated performance assessment. (Chapter 1, page 4-83)

The chart in Volume 1, page 2-22 of the draft PEIS documents the huge increase in LLW production at SRS with the 50 to 125 ppy, from and additional 4650 cubic meters of LLW at the 50 ppy level to 9400 cubic meters at annual production rate of 125 ppy. These figures would greatly increased the amount of radioactive waste dumped annually into the unlined SRS trenches - located in a wet environment, with about 45 inches of annual rainfall - with a parallel increase in environmental impacts.

The draft PEIS appears purposefully vague in lack of description of the "LLW disposal area." In fact, the waste is normally disposed of in unlined trenches. There is no analysis in the draft PEIS of the environmental impact of such a disposal method. We had pointed this out in scoping comments, such as "Exact disposal plans for LLW storage and disposal and associated impacts, including possible groundwater contamination, must be discussed in detail and not left vague."

There are concrete, surface vaults for LLW disposal at SRS but no mention of that facility is mentioned in the draft PEIS. Such things as the highly radioactive remains of irradiated Tritium-Producing Burnable Absorber Rods (TPBARs) - defined as LLW - are disposed of in the E-Area vaults. If any pit LLW would go into the vaults, please discuss that and associated environmental impacts.

According to the October 2025 Savannah River National Lab (SRNL) document "E-Area Low-Level Waste Facility Inadvertent Human Intruder Limits and Doses in Support of the PA2022," the E-Area LLW trenches will accept waste through 2065. If the SRS pit plan becomes operable, what happens with any planned LLW disposal planned for LLW disposal after 2065?

If the E-Area trenches are only active through 2065, where would SRS pit plant LLW go after that period? The PEIS must be concise on this point. If the plan is to keep the E-Area open beyond 2065, who makes the decision and pays for that and will NNSA conduct a NEPA review of that? What happens if E-Area were to not be available after 2065?

Additionally, the draft PEIS indicates some some LLW having classified form or nature my go to the disposal facility at the National Nuclear Security Site in Nevada. Please describe such materials in more detail. (BTW, I have been outside that NNSS LLW disposal facility and have seen warning signs on the fence about the classified/restricted nature of that fenced site. When the wind kicked up dust in the air our Geiger counters had higher readings.)

Adding more LLW to the burden already at SRS only magnifies the SRS waste problem, slows down clean up and postpones LLW trench closure and capping. Those spin-off impacts must be considered and reviewed in the PEIS.

Plutonium and Pit Aging are Inadequately Discussed; a True "No Action" Alternative - No New Pit Production - Must be Considered in the PEIS

NNSA has released very little information about plutonium aging and why new pits are needed. The discussion in the draft PEIS on this matter is minimal. NNSA does indicate a pit aging study is underway but this research should have been done well in advance of making a decision to pursue such high levels of pit production and at such great expense. What explains why the research was not conducted earlier, before pit-production decisions were made? It appears that, for unknown political reasons, the pit-production decisions, which are reversible, were rushed and made lacking documented scientific information that new pits are needed and on a rapid production schedule.

There is no evidence that plutonium pit aging would affect the safety and reliability of the existing nuclear stockpile for many years to come, so the pit project is being pursued in advance of proven "need."

As part of an expanded discussion about plutonium and pit aging and issues with overall management of the pit-production program, including why it's justified, these documents must be discussed and publicly released and made part of the PEIS record:

o 2025 JASON pit aging study, directed via Energy & Water Development funding,

o NNSA's Office of Enterprise Assessment's report *Leadership and Management of the Plutonium Pit Production Mission*.

Volume 2 - A.1 Plutonium and Pit Aging states this on plutonium pit aging research:

The radioactive decay of the plutonium contained within a U.S. nuclear weapon's primary component has potential cumulative effects on nuclear weapon performance. This cumulative effect of plutonium's radioactive decay is referred to as "plutonium aging" or "pit aging." To improve scientific understanding of this phenomenon, DOE/NNSA established a National Strategy for Plutonium Aging in 2017. This National Strategy, which was updated in 2020, is focused on obtaining experimental data to improve and underpin DOE/NNSA's numerical simulation of nuclear weapons performance.

Pursued through the National Strategy and guided by the 10-year National Plutonium Aging Research Program Plan, the National Plutonium Aging Program will provide DOE/NNSA with an improved understanding of pit aging. This data will support the assessment of enduring stockpile systems and certification of ongoing and future warhead acquisition programs.

NNSA prepared a report to Congress in September 2021, Research Program Plan for Plutonium and Pit Aging (NNSA 2021). The classified report outlines a 10-year research program (2021–2030) to study the effects of plutonium aging on U.S. nuclear weapons. The plan aims to improve scientific understanding, reduce uncertainties in performance predictions, and support stockpile sustainment and warhead acquisition programs. The key points identified in the report are as follows (NNSA 2021):
1. Plutonium Aging. Plutonium undergoes radioactive decay, leading to changes in its material properties over time.
2. National Strategy. DOE/NNSA established a National Strategy for Plutonium Aging in 2017, updated in 2020, to guide research efforts.
3. Goals. There are mid-term (FY 2025) and long-term (FY 2030) goals. The mid-term goals are to develop experimental data and models to reduce uncertainties in performance predictions for older pits. The long-term goals are to validate models through experiments and confidently predict primary lifetimes for stockpile systems.

The documents mentioned above need to be discussed in detail in the PEIS and be made part of the PEIS record:

o National Plutonium Aging Research Program Plan;

o Research Program Plan for Plutonium and Pit Aging (NNSA, 2021) – report to Congress;

o National Strategy for Plutonium Aging, 2017, updated in 2020.

Additionally, in a Senate Energy and Water Subcommittee meeting on April 29, 2026, Senator Murray said that a "memo outlining a series of "Transformation Objectives"—including a reevaluation of all the ongoing major production and infrastructure projects across the NNSA complex" was recently released. Please discuss how that memo impacts the plutonium pit program and construction of pit facilities and associated impact and provide the memo for the PEIS record.

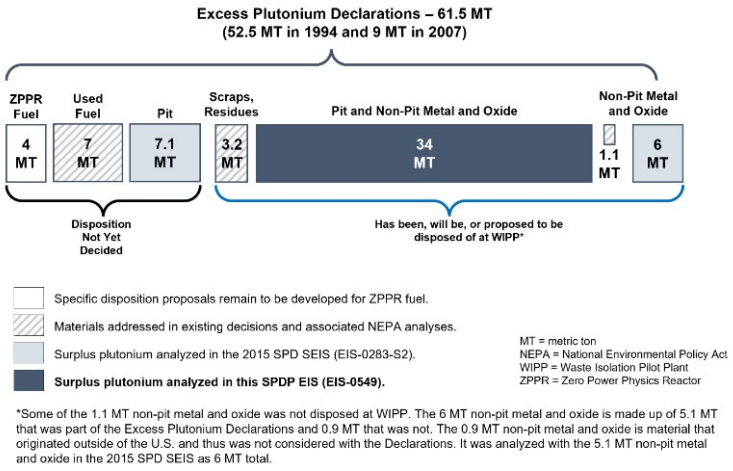
Especially given the lack evidence in the draft PEIS or elsewhere of plutonium pit aging problems, the NNSA must consider a true No Action Alternative where plutonium pits for new nuclear weapons are not produced. Lack of such a No Action Alternative in the draft PEIS raises questions about the adequacy of the document and its compliance with NEPA.

Plutonium Amounts and Sources

The summary of the draft PEIS says: *Material Receipt and Storage. Existing pits and plutonium feedstock will be delivered from Pantex, near Amarillo, Texas, in DOE/U.S. Department of Transportation-approved shipping containers via NNSA's safe, secure transport system. The bulk of the feedstock material will be in the form of pits from retired weapons, although some plutonium from other locations, such as LANL, Pantex, NNSS, and SRS, also could be used. The shipping containers will be securely unloaded from the truck, unpacked at the pit production facility, and placed into temporary storage in vaults or safes until needed in the pit production process.*

Please clarify amounts of plutonium to be used for pit production and the various sources of such plutonium. In particular, please clarify how much of the plutonium now stored at SRS will be designated to go to pit production. And, what plutonium would come from the Nevada National Security (NNSS) site? Explain what the purity levels are of the various sources of plutonium and how much purification is needed.

In the *Final Environmental Impact Statement for the Surplus Plutonium Disposition Program (Final SPDP EIS)* (DOE/EIS-0549) of December 2023, DOE breaks down the origin of 61.5 MT of surplus plutonium thusly:



A similar chart is needed in the final PEIS indicating origin of all plutonium slated for plutonium pit production (or other use or disposal). Knowing sources and purity of any plutonium to be processed will be helpful to determine environmental impacts of purification and associated waste disposal.

The requested chart would indicate, for example, where the 19.7 MT of plutonium DOE intends to provide to the nuclear power industry would come from, and if that would compete with resources slated for pits. (A NEPA review of processing and use of that 19.7 MT of plutonium is still lacking, BTW, and should be analyzed in a supplement to the plutonium disposition EIS or a new programmatic EIS on civilian use, in nuclear reactors, of NNSA-provided plutonium.)

Additionally, the draft PEIS fails to adequately discuss potential environmental, safety and security impacts of cross-country truck transport of old pits (stored at Pantex), new pits (back to Pantex from LANL and SRS, for weapons assembly) and TRU waste transport to WIPP from LANL and SRS. Such long-distance plutonium and plutonium waste transport reveals a significant environmental, safety and security problem with the "National Nuclear Security Business Enterprise" due to production and disposal sites being spread across the country.

Plutonium Metal Preparation in K Area at SRS Needs Explanation

The draft PEIS says this, which needs further explanation in the final PEIS: *To accelerate initial pit production in SRPPF, NNSA is considering using gloveboxes and facilities in K Area, which are being developed and installed for the disposition of surplus plutonium, to perform plutonium purification and metal preparation. Prepared plutonium would be transferred to the SRPPF once operational. In the future, plutonium prepared in K Area could also be sent to LANL to supplement the pit production process at PF-4.*

Currently, only one glovebox is being used for SRS plutonium disposition and it appears other gloveboxes for that purpose won't be acquired. Or will they? Which program would pay if Dilute & Dispose gloveboxes yet to be acquired are used for the pit program? Would the K-Area D&D facility and costs associated with it be transferred to NNSA? What process would be used to purify the plutonium in K-Area? What would be the waste streams if K-Area is used to prepare plutonium for the pit program, where would such waste be disposed and would NNSA manage those?

Resource Conservation and Recovery Act (RCRA)

According to the South Carolina Department of Environmental Services (SC DES) on April 29, 2026, Savannah River Nuclear Solutions (SRNS) has submitted an application for a RCRA permit for the discharges from the SRS pit plant. DES says the permit is not ready for public comment.

The draft PEIS says this about "hazardous waste:" *A category of waste regulated under the Resource Conservation and Recovery Act (RCRA). To be considered hazardous, a waste must be a solid waste under RCRA and must exhibit at least one of four characteristics described in 40 CFR 261.20–24 (ignitability, corrosivity, reactivity, or toxicity) or be specifically listed by the U.S. Environmental*

Protection Agency in 40 CFR 261.31–33.

These RCRA waste forms are not described in detail and the final PEIS should do so. Also, into which hazardous waste facilities the waste will be shipped, at least initially, must be clarified and not left as "TBD."

So that the public is aware of RCRA waste details, the final PEIS must include details of the RCRA application of SRNS, along with a link to the application.

SRS Pit Plant Sand Filter

The sand filter to filter air existing the SRS pit plant is now under construction. On the SRS pit plant tour on April 21, 2026, plaintiffs (in the PEIS lawsuit) were told that the sand filter would filter out particulates but not "vapors."

The PEIS must review how external discharge of gaseous or aerosol discharge from pit production is controlled, or not, through the sand filter, and potential impacts of such discharge. Is other filtering of pit plant discharge air available or being considered, especially in the event of plutonium accidents?

Frequency of Nuclear Criticality at LANL

In Chapter 1, page 4-41, Table 4.1.14-1, in "Radiological Accident Frequency and Consequences," at the 80 pits per year level, the frequency of nuclear criticality at LANL is listed as being 1x 10-2, or 1 in 100.

In a footnote on the page, this is listed as being an "anticipated" type of accident with an annual frequency ≥ 1 in 100.

A nuclear criticality accident with plutonium that has a 1 in 100 odds seems extremely high and is thus of concern. Please further discuss the likelihood of such an accident, particularly when handling kilogram-levels of plutonium, and discuss potential impacts to workers, public safety and the environment.

Transuranic Waste Management Issues of Concern, if WIPP Closes or TRU Waste Disposal Restricted

Up to 765 cubic meters of plutonium waste (TRU) could be created at SRS with a production rate of 125 ppy. This waste is planned to be disposed of in the Waste Isolation Pilot Plant (WIPP) in New Mexico, after storage at SRS for an indeterminate period of time.

The PEIS (volume 1, page 4-85) says:

Waste generating operations would package TRU waste such that all containers ready for shipment to the WIPP facility would qualify as contact-handled waste. Further, storage needs for the additional TRU waste would be limited because the waste is expected to be regularly shipped off

site to the WIPP facility for disposal. Staging within the security area adjacent to the SRPPF would provide surge storage to accommodate waste accumulation between shipments and any "more-than-normal" buildup of waste due to minor changes in waste generation rates or shipment schedules, with a storage capacity equivalent to approximately one year of storage. With additional storage capacity outside the Protected Area (for that portion of the TRU waste that can be stored outside the Protected Area), temporary storage capacity increases to two to three years.

WIPP was closed for 3 years following a February 2014 a salt haul truck fire and an underground waste drum explosion resulting in a radiological release. The facility was reopened in January 2017, and no waste was placed underground during that closure time though some waste was received for surface storage. (On a WIPP visit on October 1, 2015, I stood by one shipment of downblended SRS plutonium; the drums were clearly marked as being from SRS.)

Thus, with only "two to three years" of TRU surge storage capacity "outside the Protected Area" at SRS - for "qualified waste" - what happens if WIPP is closed for longer than that period of time? What are plans for additional storage at SRS or on the surface at WIPP if WIPP closes for 3 years or longer? Or, what happens at any point in the future if WIPP is permanently closed? What happens to the SRS pit plant operation if there is not enough storage space in WIPP for TRU produced by SRS pit-production operations? What happens after one year if TRU that can't be stored outside the Protected Area has filled SRS storage capacity and WIPP is closed or access is restricted?

Additionally, the New Mexico Environment Department (NMED) is placing restrictions in revised permits on the dumping of non-legacy, out-of-state TRU waste in WIPP. Legacy waste is TRU left over from Cold War and historic nuclear weapons activities and non-legacy waste is newly generated or projected TRU, such as from plutonium pit production.

On April 23, 2026, NMED issued a draft WIPP permit saying in a news release that the *proposed permit modifications would require DOE to meet its legal obligations to the State of New Mexico through several measures, including:*

1. Defining legacy waste: For too long, DOE has operated without a clear permit definition of legacy waste. This change allows definitions used in other states to be considered and holds DOE accountable to New Mexico's definition.

2. Setting objective metrics for LANL legacy waste cleanup: DOE must ensure that LANL legacy waste accounts for 55% of total disposal volume at WIPP from 2027 through 2031, increasing to 75% beginning in 2032. These targets would allow DOE to catch up on LANL cleanup obligations under the 2023 settlement agreement.

3. Establishing clear deadlines: DOE must dispose of all above-ground LANL Material Disposal Area G legacy waste at WIPP by July 1, 2028.

4. Requiring enhanced transparency: DOE must provide more robust reporting to demonstrate compliance with these requirements.

Thus, the PEIS must define just what TRU "legacy waste" is and how DOE intends to dump non-legacy TRU in WIPP, subject to NMED's permit for WIPP operation. In particular, would SRS pit plant TRU be able to go to WIPP given the NMED permit modifications, especially with the restrictions going into place in 2032 on non-LANL waste? This matter, which can't be avoided, needs discussion in the PEIS.

Additionally, DOE is required by NMED to show it will pursue a second TRU waste repository. Further restrictions could be implemented by NMED if no progress on locating the 2nd repository is shown. It should be noted that WIPP is a "pilot" plant and a second repository was promised by DOE to the people of New Mexico. What happens if out-of-state TRU is barred from WIPP if DOE does not demonstrate that it's pursuing a new TRU repository? What happens if non-legacy, out-of-state TRU disposal is slowed for many years, perhaps decades? Can the SRS pit plant operate if there is no accessible TRU disposal site?

An SRS Watch comment to NMED, dated April 23, 2026, on the "WIPP Agency-Initiated Modification Draft Permit April 23, 2026" is being submitted for the PEIS record.

Adding more TRU to what has to the "base" amount that must be dealt with at SRS only magnifies the SRS waste problem, slows down clean up and postpones full removal of TRU from the site. Those parallel, connected impacts must be considered in the PEIS.

Poor Management Performance of Pit Project has Operational, Environmental Implications

It is noted that the NNSA's Performance Evaluation Report (PER) for Savannah River Nuclear Solutions' management of the pit project in Fiscal Year 2025 says up front that "SRNS underperformed in project execution of the Savannah River Plutonium Processing Facility (SRPPF) project in FY 2025." The PER goes on to mention project delays and cost overruns. If poor management persists, the pit plant construction and operation and waste from pit production would be negatively impacted.

A Request for Proposals - Jan. 2026 draft solicitation linked here - is seeking a new contractor to manage SRS and the pit project. There is no guarantee that a new contractor or new individuals brought in on the management team can bring the project under control. If not, implications for the project and potential environmental impact if equipment operates poorly are large.

Additionally, as DOE is a self-regulating agency with no outside oversight, it is essential that DOE create a pit-production website where operational and environmental compliance reports be posted. Without such, the public likely will not know if claims made in the PEIS are being followed. Failure to establish an information web page will leave DOE rightly open to criticism concerning pit-plant operation and environmental compliance. As we saw in the MOX debacle, attempting to hide things from the public is not a good strategy. Will NNSA commit to creating a pit website?

Budget Surges for Plutonium Pit Projects Surges - Why?

According to DOE's Fiscal Year 2027 budget request, released on March 25, 2026, the funding request for the pit program would soar, raising questions about what this huge increase in funding might be and if it holds problems that might be faced due to pressure for rapid construction and pit production.

Requested funding increases for NNSA (in Volume1, "Weapons Activities") include:

o Plutonium pit production for new warheads is increased at the Los Alamos National Laboratory 83% from $1.3 billion in FY 2026 to $2.4 billion in FY 2027 ($2.3 billion projected cost for FY 2031).

o Plutonium pit production at the Savannah River Site is increased 87% from $1.2 billion in FY 2026 to $2.25 billion in FY 2027 (with $2.6 billion projected cost for FY 2031).

o Total "Plutonium Modernization" for expanded plutonium pit production at both sites is increased by 87% from $2.6 billion in FY 2026 to $4.9 billion in 2027 (with $5.2 billion projected cost for FY 2031).

We shall see how Congress deals with the requested massive increase in pit funding.

The budget request states that the upper cost estimate for the pit project SRS is $25 billion. Given a sunk cost of $5 billion to $8 billion into the terminated plutonium fuel (MOX) plant, the SRS pit plant appears to be the most expensive building in U.S. history, coming in at $30 billion or so. A new cost estimate could come out in September 2026, when Critical Decision-2 is released, but that estimate, as the MOX debacle and other costly DOE projects have shown, will likely not be reliable.

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Attachments submitted for the Draft PEIS record:

A. SRS Watch comment to the New Mexico Environment Department, concerning the WIPP permitting process, April 23, 2026, about non-legacy, out-of-state TRU disposal from pit production: https://srswatch.org/wp-content/uploads/2026/05/Comment-to-NMED-by-SRS-Watch-on-modified-permit-April-23-2026.pdf

B. Observations on visiting SRS Plutonium Bomb Plant, April 22, 2026 Tom Clements, SRS Watch, https://srswatch.org/wp-content/uploads/2026/04/talk-about-SRS-pit-plant-tour-for-April-22-2026-briefing.pdf

C. *U.S. Moves to Speed Nuclear Design, Weapon Production*, Arms Control Today, May 2026, https://www.armscontrol.org/act/2026-05/news/us-moves-speed-nuclear-design-weapon-production

D. Oral comment of Tom Clements, from May 5, 2026 meeting in N. Augusta, S.C.

Also, see this NGO website for more information on the pit issue: www.pitpeis.com.