



Savannah River Site Watch

**Oral Comment at the Public Meeting, May 5, 2026, in North Augusta, S.C. on the
“Draft Programmatic Environmental Impact Statement (PEIS) for Plutonium Pit
Production” - for \$30-Billion SRS Plutonium Bomb Plant (SRSPBP)**

Good evening. My name is Tom Clements, Director of the non-profit public-interest organization Savannah River Site Watch.

I am an unpaid volunteer and have no direct or indirect financial interest in the pit project’s success or failure. I wonder how many others present tonight can make the same claim?

I am hereby submitting a 12-page written comment, with attachments, for the official PEIS record.

I’d like to thank everyone for being here tonight. We are all here due to the efforts of public-interest groups that brought a federal lawsuit on June 29, 2021, demanding the PEIS. Plaintiffs in the case are Savannah River Site Watch, The Gullah/Geechee Sea Island Coalition, Nuclear Watch New Mexico (Santa Fe, NM), and Tri-Valley Communities Against a Radioactive Environment (Livermore, California). And me, as an individual. The South Carolina Environmental Law Project (SCELP) did a superb job representing us.

Your attendance tonight is a tribute to the importance of the work of public-interest groups in monitoring how our government functions and in holding decision-makers accountable. Without the groups that brought the PEIS lawsuit none of us would be here right now. Thank you for being part of the process we fought for. Your being here is a visible defense of the National Environmental Policy Act (NEPA), which the U.S. government is trying to destroy.

In its ruling of September 30, 2024, the court said “the Court is unconvinced Defendants took a hard look at the combined effects of environmental impacts of their two-site strategy. But, even assuming they did, their “decision not to prepare a supplemental EIS was arbitrary [and] capricious.”

The court-mandated “settlement agreement” of January 16, 2025, between plaintiffs and NNSA, clearly states that “The DOE and the NNSA will conduct a new PEIS to address all of the deficiencies identified by the Court.”

Before us is the question: Did NNSA address all the identified deficiencies and will the final PEIS be adequate?

I point out six deficiencies in the draft PEIS:

1. No evaluation of environmental impacts of dumping of low-level nuclear waste into unlined trenches in the E-Area at SRS.
2. No review of transuranic waste (TRU) storage capacity at SRS beyond the 2-to-3-year surge capacity. What happens in the event the WIPP disposal facility is closed for a lengthy period of time - as happened from 2014-2017 - due to technical, administrative or licensing reasons?
3. Lack of documentation by NNSA on the “need” for new plutonium pits as research into the aging of plutonium pits is extremely tardy and woefully lacking.
4. From a security, budget-impact or arms-control perspective, production of 80 pits per year is of concern, but what, other than a nuclear arms race or profit, justifies 205 pits per year?
5. The draft PEIS fails to analyze a true “no action alternative,” in which no new pit production is pursued.
6. In the Fiscal Year 2027 DOE budget request, what justifies \$2.5 billion for the SRS pit plant next year or its \$30 billion price tag (the most expensive building in US history)?

Thank you for your attention.

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www.srswatch.org

Group website on the PEIS process: www.pitpeis.com