Savannah River Site Watch

June 24, 2026

Comment 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)

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

This comment primarily pertains to the application by Savannah River Nuclear Solutions (SRNS) to the South Carolina Department of Environmental Services (SC DES) for a permit to handle and dispose of Resource Conservation and Recovery Act (RCRA) waste from the proposed SRS plutonium pit-production plant. The entire RCRA application was obtained via a Freedom of Information Act (FOIA) request to SC DES. My earlier request for NNSA to include the RCRA permit application in the PEIS record still stands. I request that this public comment and all such comments be included in a publicly accessible appendix to the PEIS. Points to address in the PEIS:

1. Please explain in the PEIS why the RCRA permit, necessary of operation of the SRS pit plant, was not applied for by the administrator and owner of the Savannah River Site (SRS) pit-production project, the DOE's National Nuclear Security Administration (NNSA).

2. Please explain in the PEIS what happens to the RCRA permit-application and issuance of the RCRA permit if contractor SRNS were to no longer be involved with the SRS pit project.

Pertaining to the ***Savannah River Plutonium Processing Facility RCRA Permitted Facility -- South Carolina Hazardous Waste Management Location Standards Compliance Demonstration (R.61-104) -- January 2026 Revision 0***, see pages 2-3:

Building 243-5F, Waste Management and Shipping and Receiving Storage Building: "This is a nuclear safety hazardous Category III building to be permitted for hazardous and mixed waste storage. This is a multipurpose building that can store different types of waste: however, this building is outside the SRPPF protected area fence. The primary purpose of this building is to provide overflow for TRU waste to meet the storage capacity requirements, stage waste for shipment or vendor pickup, and to stage containers and packaging supplies for the SRPPF Area.

If TRU waste is stored in his building, it is returned to Building 243-4F for loading and off-site transport. In the event of changes to offsite TSDF requirements such as the WIPP, radiological protection will be required for any TRU waste requiring repackaging. That can be done in a

containment structure inside of the TRU waste storage buildings, or the waste may be returned to the 226-F production facility to safely repackage in the excess material gloveboxes or the drum loading containment hut. This building may also temporarily store and consolidate waste from the High-Fidelity Training Operations Center (HFTOC) as needed for transfer to a compliant disposal facility.

3. Please discuss in the PEIS why "overflow for TRU waste" outside the SRPPF protected area might be needed.

4. Please address what capacity the overflow 243-5F facility is planned to have. If access is restricted to WIPP for newly generated SRPPF TRU, is there enough storage capacity in 243-5F to store all TRU generated over the lifespan of operation of the SRPPF? If not, what TRU storage options are available?

5. Please explain if the Building 243-5F overflow building would be utilized if the aging WIPP facility is closed from receiving SRPPF waste for any length of time and for any reason.

6. Please explain for what period of time the capacity of Building 243-5F could be utilized if WIPP were to close or if non-legacy waste from the SRS pit project was not permitted to go to WIPP. What happens if waste stored in Building 243-5F could not be transferred to Building 243-F for "loading and off-site transport," due to capacity issues, WIPP closure or lack of a new TRU disposal facility?

Pertaining to the ***United States Department of Energy Savannah River Site RCRA PERMIT APPLICATION Volume XXVI Savannah River Plutonium Processing Facility (SRPPF) RCRA Permitted Facility***, see page C-1:

WASTE CHARACTERISTICS Rev.0 SRNS-IM-2025.00118 Date: December 2025 Chemical, Physical and Production Analysis. The RCRA permitted Buildings 731-2F. 243-1F, 243-2F, 243-4F. and 243-5F will store HWs, MWs (MLLW and mixed TRU [MTRU]). possibly some UW (not to include end of life lithium-ion batteries), and used oil when applicable. Wastes will be stored in the RCRA permitted facilities until they can be removed for treatment and/or disposal in accordance with State and Federal requirements. Wastes generated at SRPPF are non-legacy waste and are considered newly generated production wastes. Some waste will be minimally processed as required by overpacking damaged containers or the rare occasion when absorbents are needed for small amounts of liquids originating from condensate. Based on the nature of the production process, liquid TRU waste will not be generated at SRPPF and is prohibited at the WIPP TRU waste disposal facility.

7. Please comment on the statement in the RCRA permit application that "Wastes generated at SRPPF are non-legacy waste and are considered newly generated production wastes."

8. What impacts will there be on disposal of non-legacy SRS pit plant TRU and non-legacy RCRA-associated waste in WIPP, given the New Mexico Environment Department's restrictions on disposal of out-of-state, non-legacy waste?

9. Please explain what impact closure of WIPP for up to a 6-month period would have on SRPPF operation and TRU storage at SRS. Such an actual closure in 2026 is cited in Appendices A & B.

The RCRA permit application contains various tables that list potential hazardous waste in solid and liquid form. These wastes are listed as being from such things as: machining operations, metal finishing operations, electrochemical refining activities, metal-polishing operations and plutonium-processing operations, all of which should be discussed in the PEIS.

See three tables below, from the SRNS RCRA application to SC DES.

Table 2-1: Description of Hazardous Waste Stored at the SRPPF RCRA Permitted Facilities

Table 2-2: Description of Mixed Low-Level Waste Stored at the SRPPF RCRA Permitted Facilities *(continued)*

Waste Description	Waste-Generating Activity	Basis or Hazardous Waste Designation	Potential EPA Hazardous Waste Numbers	Potential Hazardous Waste Constituents and/or Characteristics	Regulatory Limits (mg/L)
			Solid Wastes (continued)		
Lead Waste	Shielding material	Acceptable Knowledge & Sampling and Analysis	D008	Lead	5.0
Unused Solid Reagent Chemical Wastes	Laboratory, maintenance, operations, production excess chemicals	Acceptable Knowledge & Sampling and Analysis	D001	Ignitability	NA
			D002	Corrosivity	NA
			D003	Reactivity	NA
			All P- and U- listed EPA Hazardous Waste Numbers	Discarded commercial chemical products and off-specification species	NA
			Liquid Wastes		
Aqueous and Nonaqueous Liquids Contaminated with Heavy Metals and/or Organics	Electrochemical Refining activities, metal-polishing operations, and radiochemistry research	Acceptable Knowledge & Sampling and Analysis	D001	Ignitability	NA
			D004	Arsenic	5.0
			D005	Barium	100.0
			D006	Cadmium	1.0
			D007	Chromium	5.0
			D008	Lead	5.0
			D009	Mercury	0.2
			D010	Selenium	1.0
			D011	Silver	5.0
			D018	Benzene	0.5
			D019	Carbon tetrachloride	0.5
			D021	Chlorobenzene	100.0
			D022	Chloroform	6.0
			D023	o-Cresol	200.0
			D024	m-cresol	200.0
			F005	Spent non-halogenated solvents	NA

Table 2-2: Description of Mixed Low-Level Waste Stored at the SRPPF RCRA Permitted Facilities *(continued/end)*

Waste Description	Waste-Generating Activity	Basis or Hazardous Waste Designation	Potential EPA Hazardous Waste Numbers	Potential Hazardous Waste Constituents and/or Characteristics	Regulatory Limits (mg/L)
Liquid Wastes (continued)					
Corrosive Liquid Waste	Radiochemistry research, plutonium-processing operations, and analytical chemistry	Acceptable Knowledge	D002	Corrosivity	NA
			D004	Arsenic	5.0
			D006	Cadmium	1.0
			D007	Chromium	5.0
			D008	Lead	5.0
			D010	Selenium	1.0
			D011	Silver	5.0
			D036	Nitrobenzene	2.0
			D043	Vinyl chloride	0.2
			F005	Spent non-halogenated solvents	NA
Oil Wastes	Equipment maintenance operations	Sampling and Analysis	D004	Arsenic	5.0
			D005	Barium	100.0
			D006	Cadmium	1.0
			D007	Chromium	5.0
			D008	Lead	5.0
			D009	Mercury	0.2
			D010	Selenium	1.0
			D018	Benzene	0.5
			D019	Carbon tetrachloride	0.5
			D027	1,4-Dichlorobenzene	7.5
			D028	1,2-Dichloroethane	0.5
			D032	Hexachlorobenzene	0.13
			D033	Hexachlorobutadiene	0.5
			D034	Hexachloroethane	3.0
			D036	Nitrobenzene	2.0
			D037	Pentachlorophenol	100.0
			D038	Pyridine	5.0
			D041	2,4,5-Trichlorophenol	400.0
			D042	2,4,6-Trichlorophenol	2.0
			D043	Vinyl chloride	0.2
			F005	Spent non-halogenated solvents	NA

10. Please discuss in the PEIS the origin and role of each of the various chemical and hazardous waste constituents in the various processes listed in the tables above, including chemicals and waste associated with: machining operations, metal finishing operations, electrochemical refining activities, metal-polishing operations and plutonium-processing operations. And, what are the accident and environmental risks and impacts of each of those operations or activities?

11. Please discuss in the PEIS the volume and storage of "potential hazardous waste" and mixed LLW generated during the above-cited processes and associated impacts.

---

12. I reiterate the need for the PEIS to clearly state where the plutonium will come from that would be purified and cast into new pits along with associated waste streams.

In the DOE's far-fetched and unfunded "SURPLUS PLUTONIUM UTILIZATION PROGRAM - REQUEST FOR APPLICATION (RFA) NUMBER: DE-FOA-0003594," of October 21 2025, the 19.7 metric tons of DOE plutonium being offered to private companies for use as fuel in non-existent nuclear reactors has the following table with the breakdown of the origin of the plutonium (see *Request for Applications* explanatory document, page 6):

IV. Available Plutonium for the Program

The availability of plutonium materials for this program is listed below:

Materials	Material Type	Metal	Oxides
Process/Product Materials	Weapon Grade (<7% Pu-240)	~1.0 MT	~6.1 MT
Process/Product Materials	Fuel + Reactor Grade (>7% Pu-240)	~0.7 MT	~2.3 MT
ZPPR	Weapon + Fuel + Reactor Grade	~2.7 MT	~0.3 MT
Plutonium-Bearing Materials	Mixed		~6.6 MT*
	Total	**~4.4 MT**	**~15.3 MT**

* Material is in various forms. MT = metric tons

Lacking any legally mandated NEPA analysis of the plutonium give-away and use program, even this highly speculative, impractical and poorly explained project includes a table on the types of plutonium involved in the project.

Inclusion in the PEIS of a table on the origin of plutonium for pit production would help demonstrate that DOE believes the schedule of its pit-production project to be well thought out and with a solid planning basis. Such a table is one thing that would be necessary for the PEIS to be "adequate."

Thus, I request that a table in the PEIS be included, with plutonium planned to go to pit production - including such things as type of plutonium material to be used for pit production, amount of such plutonium material, where such material is stored, where it would be fabricated into pits and associated waste streams.

---

13. To repeat an earlier comment, these documents on plutonium pit aging - with names cited by the NNSA and mentioned in the draft PEIS appendix - must be discussed in detail in the final PEIS and declassified versions of them must 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.

One or more of the above reports may be a report prepared by the JASON group for the NNSA.

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 provide the memo for the PEIS record.**

Thank you for considering this comment in your preparation of the final PEIS, if the document will, in fact, be completed and a Record of Decision (ROD) issued.

Tom Clements
SRS Watch
Columbia, SC
www.srswatch.org

Note: The two appendices mentioned in #9 above are attached.

Appendix A – article about "temporary" 4-month closure of WIPP in 2026

Nuclear waste disposal halted as Waste Isolation Pilot Plant grapples with hoist issues

Carlsbad Current-Argus, June 23, 2026

Adrian Hedden
achedden@currentargus.com

https://currentargus.com/nuclear-waste-disposal-halted-as-wipp-grapples-with-hoist-issues/

Nuclear waste disposal was halted more than a month ago at the Waste Isolation Pilot Plant amid problems with its elevator system.

Federal records show no waste shipments have been emplaced at the repository near Carlsbad since May 7, and federal officials said they didn't plan to resume disposal until the end of August.

At WIPP, the Energy Department disposes of transuranic nuclear waste (TRU), which is clothing materials, equipment and other debris irradiated during nuclear activities.

The waste is buried at WIPP in a salt deposit about 2,000 feet underground. The salt gradually collapses on the waste, burying the refuse and blocking radiation from escaping.

To do that, WIPP operates a series of three hoists, or "shafts," which function as elevators carrying waste underground, mined salt to the surface and people in and out of the repository.

The waste and salt hoists double as lifts for workers, as does the air intake shaft. The waste hoist is the primary lift for people, but the other two can be used for emergency egress as required by state regulations.

Another shaft that exhausts air does not have hoisting capabilities. Nor does a fifth shaft recently built on west end of the mine.

The salt and air intake shafts were taken out of service for maintenance April 15 and April 28, respectively, according to a May 14 report from the Defense Nuclear Facilities Safety, an independent federal watchdog agency.

That meant all underground work was halted as there is no alternative path out of the mine should the waste hoist also go down.

This will be the case until Aug. 27 at the earliest, according to a June 16 request by the energy department to store 357 containers of waste at the surface of the site without disposing of them underground within the 60-day limit defined in the department's state operations permit for WIPP.

The containers represent a total of 25 shipments from Idaho and Los Alamos national laboratories and the Savannah River Site in South Carolina.

The New Mexico Environment Department approved the energy department's request June 17, granting WIPP an extra 60 days to store the drums at the surface of the site, in the parking lot and in the waste handling building, where containers are typically prepared for disposal.

"The waste containers currently stored in the (waste handling building) and (parking lot) pose no additional hazards to human health or the environment," read the federal government's request.

To justify these assertions, the energy department contended the drums are currently in a safe position "in accordance with WIPP standard operating procedures," and that they will be inspected weekly.

"The waste containers are closed and are not stored in a manner that may rupture the containers or cause them to leak. No evidence of open containers or improper storage has been observed," the request read.

In the New Mexico Environment Department's approval of the extension, the state agency agreed that the conditions warranted the extension, and the energy department was to hold the waste where it is without disposal from June 28 to Aug. 27.

"The Request lists reasons the extended storage time poses no additional hazards to human health and the environment," read the approval notice. "NMED herby grants the request for an extension of time."

Don Hancock, nuclear waste program director at Albuquerque-based nonprofit and government watchdog the Southwest Research and Information Center, said the need to hold the waste above ground was a symptom of a broader problem at WIPP.

He said the facility was aging beyond its originally intended lifetime of 25 years – 1999 to 2024, according to WIPP's initial 10-year permit with the state of New Mexico.

The permit was last renewed in 2023, and the 2024 end date was removed. Federal officials now say WIPP will remain open until about 2080 as it pursues its legal capacity of 6.2 million cubic feet of waste. Officials

recently estimated the site was at about 40% of that capacity.

“WIPP is old and obsolete. DOE doesn’t want to admit it,” Hancock said. “They can’t stay open that long. It’s ludicrous.”

Hancock said the longer lifetime, which he also criticized as going beyond what New Mexicans agreed to in the first place, was leading to crumbling infrastructure being used beyond its intended duration.

He also pointed to a “maintenance outage” the Department of Energy announced at WIPP between Jan. 5 and March 13, when WIPP’s primary operations were halted to allow for about 140 maintenance projects throughout the site.

Hancock questioned the success of the outage given that disposal operations had to be suspended about two months later.

“WIPP is going to be shut down for more than six months. If you’re only operating half the time, most businesses would say that’s not adequate,” Hancock said. “There are serious problems that need to be addressed.”

One of those, Hancock argued, is the need for a new repository outside New Mexico. In the 2023 permit renewal, a clause was added stipulating that the federal government must report to the state annually on its progress in finding such a location.

Meanwhile, the Environment Department recently proposed a modification to the permit that would require half of WIPP’s disposal capacity be reserved for Los Alamos – the only generator site within New Mexico – by 2027 and 80% by 2031.

Hancock said the proposal was made to ensure WIPP benefits New Mexico in the last years of its operation. The proposed change was recently opposed by federal officials who requested a public hearing to contest the amendment. The hearing has yet to be scheduled.

“The state needs to take targeted action to see if they’re meeting real milestones and getting the waste out of Los Alamos, which to New Mexico is the highest priority,” he said. “The citizens of New Mexico are tired of waiting for action to happen.”

Managing Editor Adrian Hedden can be reached at 575-628-5516, or @AdrianHedden on the social media platform X.

Appendix B – Defense Nuclear Facilities Safety Board (DNFSB) report of May 14, 2026, on Air Intake Shaft hoist out-of-service issues (dictating shaft closure to at least July 2026)

DEFENSE NUCLEAR FACILITIES SAFETY BOARD, May 14, 2026

https://www.dnfsb.gov/sites/default/files/2026-06/WIPP%20Monthly%20for%20April%202026.pdf

Waste Isolation Pilot Plant (WIPP) Cognizant Engineer Report for April 2026

DNFSB Staff Activity: On March 26, 2026, Salado Isolation Mining Contractors, LLC (SIMCO) personnel provided the preliminary continuous air monitor (CAM) testing plans to DNFSB staff for review. The testing plan is responsive to concerns highlighted in a May 15, 2024, Board Letter regarding the ability of the CAM system to perform its safety function in an environment with airborne soot and salt particles. DOE's response letter, dated November 14, 2024, committed to collecting CAM reliability data on environmental impacts, such as salt loading. The DNFSB staff is evaluating the test plan and coordinating with SIMCO staff to discuss. The WIPP and National Transuranic Waste Program cognizant engineers also held periodic meetings to maintain awareness of mining and waste-handling activities.

Hoisting Capability Project: In April, SIMCO projects personnel submitted the Safety Design Strategy for the Hoisting Capability Project to the Carlsbad Field Office for review. The project includes upgrading the Air Intake Shaft (AIS) and installing a new hoisting system in the new Utility Shaft. DOE headquarters personnel are evaluating whether the proposed strategy is adequate to support Critical Decision-1 approval.

N**ew Filter Building (NFB):** Last month, during a walkdown of the NFB, the WIPP cognizant engineer observed yellowing of the polyethylene-based domestic water lines feeding water to the NFB exhaust fan cooling water system (see WIPP Monthly for March 2026). In response, SIMCO engineers completed a technical operability evaluation of the potentially degraded piping. In the report, SIMCO engineers state that the condition could be caused by heat, chlorine oxidation, or excess ultraviolet radiation exposure, any of which could lead to material degradation and brittle failure of the piping. SIMCO engineers concluded that the condition of the piping is acceptable for use with continued monitoring.

Air Intake Shaft Hoist Issue: On March 23, 2026, a subcontractor was onsite to collect specification measurements of the AIS hoist babbitt bearings for planned replacement due to signs of wear. The babbitt bearings are a critical component of the hoist assembly, functioning as a load-bearing cradle for the spin wheel axle. Minor degradation of this bearing can lead to excessive vibrations and accelerate rope deterioration. In significant cases, failure can cause overheating and bearing seizure, leading to a shaft entrapment. The subcontractor collected the measurements and reassembled the bearing assembly. On April 15, 2026, due to excessive vibrations and concerns with the functionality of the babbitt bearings, SIMCO operations personnel placed the AIS hoist out-of-service. SIMCO management personnel are working to obtain replacement bearings for the affected equipment and plan to complete the repair in July 2026.

Salt Hoist Issue: On April 28, 2026, the salt hoist experienced braking system issues due to a worn control relay. SIMCO personnel placed the salt hoist out-of-service for repair and returned it to service later that afternoon. Immediately following the hoist service outage, SIMCO operations personnel commenced an orderly evacuation of all personnel in the underground via the waste hoist—the only remaining operational hoist.

###