



Savannah River Site Watch

**Supplementary Comment on Draft Plutonium Pit PEIS (DOE/EIS-0573) & Attachments,
by Tom Clements, Savannah River Site Watch, www.srswatch.org**

August 13, 2026

This is a supplementary comment filed into the draft Programmatic Environmental Impact Statement (PEIS) record. For legal and procedural reasons, this comment should be accepted though filed after the closure of the official comment period on July 16, 2026. This situation demonstrates that our request to extend the formal comment period for 30 days should have been granted.

In response to Freedom of Information Act (FOIA) requests and a threatened lawsuit, DOE's National Nuclear Security Administration (NNSA) was forced to release a JASON group technical report "Executive Summary" that does not support a rapid return to production of plutonium "pits" (weapons cores) for new nuclear warheads. We thus conclude that the \$30-billion building at the Savannah River Site (SRS), being prepared for a rapid, full-scale production of up to 125 plutonium pits per year plutonium should be placed on hold and this option must be reviewed in the final PEIS.

In response to their FOIA requests for the full JASON "Plutonium Aging" report, Nuclear Watch New Mexico and the Union of Concerned Scientists received these two versions of the same Executive Summary documents:

1. JASON 2-page summary report ("Executive Summary") on plutonium pit aging, dated March 25, 2026, provided, with no text redacted, in response to a FOIA request to Nuclear Watch New Mexico and the Union of Concerned Scientists, by NNSA on August

7, 2026: 2026: https://srswatch.org/wp-content/uploads/2026/08/JASON-Plutonium-Aging-Executive-Summary-Unclassified_Redacted-2-FPIA-response-August-7-2026.pdf

2. The totally redacted JASON Executive Summary, reflecting a misuse of FOIA exemptions, originally provided in response to the FOIA requests to NNSA, received on July 14, 2026 and posted here:

https://srswatch.org/wp-content/uploads/2026/08/JASON-Plutonium-Aging-Executive-Summary-Unclassified_Redacted-provided-July-15-2026.pdf

SRS Watch interpretation of the JASON “Plutonium Aging” summary of March 25, 2026:

The 2-page Executive Summary of the March 2026 “Plutonium Aging” technical report by the JASON group, research arm of NNSA, initially withheld in its entirety in response to a FOIA request by Nuclear Watch New Mexico, a plaintiff in the PEIS lawsuit, and the Union of Concerned Scientists, includes significant implications on the need, or not, for rapid establishment of new plutonium pit production and plutonium pit reuse.

I am hereby placing the 2-page Executive Summary of the JASON "Plutonium Aging" report into the PEIS record via the attached PDF file. A fully redacted version of the Executive Summary is also attached for the record. Plus, a copy of the NNSA response letter with bogus FOIA exemption-justifications is also attached. (Realizing a lawsuit was coming, NNSA, wisely reversed course and dropped their improper use of the exemptions.)

A copy, redacted as necessary, of the full JASON “Plutonium Aging” report should be released and placed in the PEIS record.

Those who commented on the draft plutonium pit-production Programmatic EIS (PEIS), including Savannah River Site Watch, asked that the full JASON report be provided for the record and before the end of the comment period (July 16). For us plaintiffs in the PEIS lawsuit, including SRS Watch, the South Carolina Environmental Law Project (SCELP) sent a letter on our behalf to NNSA on July 6, 2026 and asked for various documents to be immediately released, including the 2026 JASON report:

The three documents that SCEL P is demanding are:

- 1. A new plutonium pit life study by independent scientists known as the JASONs. NNSA claims that potential aging effects drive the need for the immediate production of new pits, thereby ruling out the alternative of reusing some 15,000 existing pits. In contrast, a 2006 JASON pit life study concluded that most pit types have reliable lives of more than 100 years and those that don't have relatively easy fixes (the average pit age is now ~43). We believe that NNSA has been withholding an unclassified summary of the new JASON pit life study since the end of 2025. NNSA has not released it despite requests by Members of Congress and public Freedom of Information Act requests.*
- 2. A Department of Energy "Special Study" on NNSA leadership and management of its troubled plutonium pit production program, scheduled for completion in December 2025. That Study is expected to be critical of the new pit production plant at the Savannah River Site (SRS) in South Carolina, which will be the most expensive building in US history (\$30 billion-plus). DOE has not released this Special Study despite requests by Members of Congress and public Freedom of Information Act requests.*
- 3. A new "Probabilistic Seismic Hazard Analysis" (PSHA) for the Los Alamos National Laboratory (LANL) that is nearly a decade overdue. A 2007 LANL seismic analysis prompted badly needed seismic upgrades to the Lab's plutonium pit production facility. NNSA's April 2026 draft Pit Production PEIS stated that the new PSHA would be completed in early 2026, yet it is still not available for public comment.*

NNSA ignored the SCEL P and public requests and the public was denied the opportunity to enter comments into the record about the important, very relevant JASON report. As we now have the Executive Summary of the JASON report, it is extremely important that it and supplemental comments about it be allowed for the PEIS record. I am thus requesting that this and other late-filed comments - which are necessary only because of NNSA foot dragging in releasing the report - be accepted into the record. A legal argument can be made that NNSA has impeded the ability of the public to comment in this NEPA proceeding on a document that should have been released well before the

end of the comment period. Meanwhile, other requested, key documents remain unreleased.

The SCELPLP letter to NNSA is posted at: <https://www.scelplp.org/news/plaintiffs-demand-release-of-critical-documents-and-extension-of-public-comment-period-on-expanded-plutonium-bomb-core-production>.

As background, the JASON report on “Pit Lifetime” from 2006 – https://nukewatch.org/oldsite/facts/nwd/JASON_ReportPuAging.pdf – stated, concerning pit aging, that “most primary types have credible minimum lifetime in excess of 100 years as regards aging of plutonium; those with assessed minimum lifetimes of 100 years or less have clear mitigation paths that are proposed and/or are being implemented.” NNSA avoids discussion of this in the draft PEIS and hasn’t presented any facts in the draft PEIS that undermine the 2006 report's conclusions. The conclusions of the 2006 JASON report and their relevance today, including “clear mitigation paths” concerning aging that have been or are being taken, must be discussed in the final PEIS.

In 2019, the JASON group issued a brief “letter report” – <https://irp.fas.org/agency/dod/jason/pit-aging.pdf> – that concluded “we urge that pit manufacturing be re-established as expeditiously as possible in parallel with the focused program to understand Pu aging.” Likewise, this JASON “report” must be addressed in the final PEIS. The 2-page 2026 JASON Executive Summary does not concur with that 2019 statement.

The key findings of the 2026 JASON report are:

1. “Overall, the results from the first five years of the Plan [*on plutonium and pit aging*] show that there are gradual changes in Pu material properties as a function of age, at a level that do not call into question present weapons performance.” The report further states: “The Pu in the stockpile appears to be aging slowly. The degradation issues that have been observed do not call into question present weapons performance.” Thus, it

is not for plutonium pit aging reasons that NNSA is rapidly pushing to produce large quantities of new plutonium pits.

> The final PEIS must discuss the conclusions of the 2026 JASON report and that current weapon performance is not impacted by aging. And, lacking research that should have already been concluded, that it is not known when or if aging problems may appear.

2. Most importantly related to pit aging, NNSA should continue research on the matter and “prioritize” “subcritical” tests, underground at the Nevada National Security Site, to better inform the pit aging research. A research plan of “work needed in FY31-40” on Pu aging should be executed. The report does not say the priority should be new pit production.

From the 2-page summary: “NNSA and its Laboratories must prioritize execution of subcritical experiments at ECSE if possible before FY30 and no later than FY35, along with establishing pit production capabilities that may be needed to provide options to mitigate any future aging-related issues.”

> The PEIS must discuss the priority of subcritical tests at this point and not ramping up to full-scale plutonium pit “manufacturing”

3. The 2026 JASON Executive Summary does not affirm the 2019 conclusion of the JASON group to re-establish pit “manufacturing” (production) “as expeditiously as possible” but simply says that pit-production “capabilities that may be needed” should be pursued. This is no ringing endorsement of NNSA’s current plan to urgently produce up to 205 plutonium pits per year at Los Alamos and SRS, as presented in the draft Programmatic EIS. Pit production “capabilities” can be established, even at a single site, without large-scale production being implemented. And, the word “may” does not mean “will.”

Given on-going research and no current “degradation” in weapons performance, the implication of the 2026 JASON Executive Summary is that there is ample time to

continue research before a decision is made on rapid and expanded pit "manufacturing" (production).

> The final PEIS must discuss the matter directly above, including that the establishment of pit "manufacturing" is not the same as establishing pit-production "capability."

4. And, the 2026 2-page JASON summary does not question the 2006 JASON finding that pits can last 100 years or more. (Those pits would have been made at DOE's now-closed Rocky Flats Plant in Colorado.)

> The final PEIS must discuss that the 2026 JASON Executive Summary does not question the 100+-year lifetime of most pits.

Below are some conclusions that PEIS plaintiff SRS Watch draws from the JASON Executive Summary. As a plaintiff in the PEIS federal lawsuit, as an individual and on behalf of Savannah River Site Watch, it is imperative that all of these points be addressed in the final PEIS:

That NNSA has dragged its feet on releasing the report clearly reveals that it does not want information in the public realm that runs contrary to its rhetoric about an urgent need for pit production at two DOE sites, Los Alamos and Savannah River Site. It remains the case that pits can last 100 years or more and that existing pits show no degradation in performance in a nuclear warhead, as affirmed by the JASON 2026 "Plutonium Aging" report, which makes the case that no new pit production is urgently needed for the existing stockpile.

This JASON Plutonium Aging report should have been released before or during the public comment period for the draft Programmatic EIS on plutonium pit production. NNSA's failure to have released it has clearly denied the public the right to assess the findings of the report and ability to comment on it for the record during the official scoping period.. NNSA must now accept additional comments into the PEIS record to correct the error it made.

The 2026 JASON report does not affirm the current path that NNSA is now on concerning pit production - that such production be rapidly pursued, at great expense. Rather, the report affirms continuation of a measured, scientific research program concerning plutonium pit aging while leaving open the question if actual production of new pits is needed in the future. The PEIS must address what the aging research plan is and provide documentation about it.

As a large part of the basis for new pit production has been due to issues related to plutonium aging, the JASON 2-page summary undermines NNSA's claim that pits are aging rapidly such that a massive infrastructure be implemented quickly to produce new pits for new nuclear warheads for which there is no demonstrated need. Thus, NNSA's justification for new pit production is now subtly questioned by its own research body.

The 2026 JASON report does not validate the fast-paced track that NNSA is on concerning pit production at SRS, leading SRS Watch to conclude that production efforts at SRS must be slowed down as pit aging research continues and new findings are publicly presented on both new pit production and reuse of existing pits now in storage. This research should have been concluded before NNSA's rush into new pit production.

The facility at SRS currently being prepared to produce pits has been cleared of equipment and prepared for future construction, so now is a good time to place that facility on hold until such time that NNSA can publicly present technical and scientific justification that new pits are needed. In the meantime, diligent efforts must be renewed among nuclear weapons states for continued disarmament and a halt to production of provocative new weapons.

Likewise, as the new JASON report implies, "judicious" reuse of stored pits can be pursued. The extent of such pit reuse for various warheads and the pit reuse plan(s) and schedule(s) must be discussed in detail in the final PEIS.

I request that this comment be included in an appendix of public comments on the draft PEIS.

These supplementary comments should be accepted and considered as NNSA continues to evaluate the draft PEIS record and before finalizing the PEIS. It is of concern that NNSA did not release the Executive Summary for the JASON report until after the official comment period closed for the PEIS draft. The same goes for the other key documents that have been requested and that should be considered in the PEIS evaluation. Those documents should also be included in the public administrative record for the PEIS.

The core purposes of the National Environmental Policy Act (NEPA) are to ensure informed decision-making by federal actors and to ensure meaningful public participation in the decision-making process. Consideration of these comments and inclusions in the PEIS record of those documents identified by SCELPA and others is necessary for NEPA to function as intended and failing to do so risks violating those legal requirements and obligations.

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