



July 24, 2019

Ms. Jennifer Nelson

NEPA Document Manager
NNSA Savannah River Site Field Office
P.O. Box A
Aiken, SC 29802

Email to: NEPA-SRS@srs.gov

Re: Scoping comments for the National Nuclear Security Administration's (NNSA's) draft Environmental Impact Statement for plutonium "pit" production at the Savannah River Site

Dear Ms. Nelson,

PAX works together with committed citizens and partners to protect civilians against acts of war, to end armed violence, and to build a just peace. PAX is a partnership between IKV (Interchurch Peace Council) and Pax Christi. Our central values, of human dignity and solidarity with peace activists and victims of war violence, lead to a distinct vision of peace and security. In our peace work, we are guided by the concept of human security; the protection and security of civilians leads our responses to conflicts.

These comments are respectfully submitted on behalf of PAX, as provided for by the National Environmental Policy Act (NEPA) on the scope of issues that the NNSA must address in its draft environmental impact statement for plutonium pit production at the Savannah River Site (SRS). I also look forward to submitting comments on the draft EIS after its completion. I kindly request to be added to your mailing list for further updates as these issues progress.

Extension request

We request that the public comment period for the draft SRS EIS be extended for no less than 30 days past the current July 25, 2019 deadline in order to allow for more participation in the discussion.

No Action Alternative

PAX supports the "No Action Alternative". There has been a severe lack of justification for "repurposing" the failed MOX Fuel Fabrication Facility (MFFF) for conversion into a plutonium pit production plant. Plutonium pit fabrication would be a completely new activity for the Savannah River Site, and is unnecessary.

Generating new plutonium pits carries unacceptable risk for those residing near the facility, there are already significant legacy cleanup issues from previous pit production facilities.



Additionally, there is no justification for new plutonium pits in a world in which nuclear weapons are outlawed. Though the United States is not yet party, the Treaty on the Prohibition of Nuclear Weapons clearly and unequivocally prohibits the manufacture and production of nuclear weapons and other nuclear explosive devices. The nuclear Non Proliferation Treaty, of which the US is party, obligates its members to act in such a way as “*to achieve at the earliest possible date the cessation of the nuclear arms race and to undertake effective measures in the direction of nuclear disarmament*”, and “*facilitate the cessation of the manufacture of nuclear weapons*”. The production of new plutonium pits fulfills none of these responsibilities.

Scope of Draft EIS

Lack of resources for legacy clean-up

The Draft EIS must analyze the compound effect of resource diversion to new nuclear weapons facilities instead of keeping the focus on the cleaning up of the massive environmental damage caused by past nuclear materials production and other waste-producing activities at SRS.

New waste streams

The Draft EIS must also consider the full public health and environmental effects of new radioactive and chemical waste streams that can result in health impacts and pollute precious water resources. Changing climate impact on water systems should also be part of this consideration.

Realistic timeframes & costs estimates

There was already over 7 billion taxpayer dollars spend on the now canceled MOX Facility. At the same time studies have suggested NNSA’s plan to repurpose the MFFF “extremely challenging” and impossible to achieve by 2030 as claimed.

Increased risk of nuclear explosive testing

NNSA’s Fiscal Year 2020 budget request and other documents make clear that future pit production is for new nuclear warheads, not to maintain the safety and reliability of the existing stockpile. New-design nuclear weapons, which has negative nuclear non-proliferation implications. Given the current moratorium on explosive testing of nuclear weapons, those pits cannot be full-scale tested or alternatively, could prompt the U.S. to return to testing, which would have serious international proliferation consequences as well as environmental consequences that must be elaborated.

Lack of justification

At least 15,000 plutonium pits already exist, stored at DOE’s Pantex site in Texas. It is known that modern pits have reliable lifetimes of a century or more. Given this, the draft SRS EIS needs to fully and concretely justify expanded plutonium pit production and discuss reuse of stored pits.

Sequencing

These matters must be considered in a nation-wide programmatic environmental impact statement (PEIS) to be conducted by DOE, a document that must precede the draft SRS EIS. That PEIS is required to raise the current 20 pits per year production cap set by the 1996 Stockpile Stewardship and Management PEIS, which authorizes pit production at only the Los

Alamos Lab in New Mexico. There is increased urgency for a new PEIS is now that NNSA plans to expand to the second production facility at SRS.

Objectivity

As the MFFF is already partially built, this draft SRS EIS will be an unusual undertaking. NNSA must concretely demonstrate that it can pursue an impartial process, without predetermination, and come to an objective decision to repurpose the MFFF. SRS must not be considered for pit production just because the MFFF is already partially built. Sunk costs or efforts to recoup investments in the MFFF are not a significant enough justification for such an expansive undertaking as producing new plutonium pits at SRS.

Economic assessment vs environmental assessment

The interests of Savannah River Nuclear Solutions (Fluor, Huntington Ingalls Industries and Honeywell), Bechtel, and Leidos, and other contractors are outside the scope of an environmental impact assessment.

Comprehensive and transparent risk assessment

Before repurposing the MOX facility, there should be investigations into fraud, waste, abuse and mismanagement associated with the MOX program both before and during its termination.

The scope of the Draft EIS must include a comprehensive and transparent risk assessment that addressed, *inter alia*, the following questions: What are the risks of establishing a completely new plutonium pit production mission at SRS? What retraining of existing staff will be necessary to ensure the safety of personnel and equipment, and prevent hazards? As there are chronic nuclear safety problems that have plagued the Los Alamos Lab, which has 70 years of experience in pit production, what will be different at Savannah River Site?

Transportation impacts

The risks of transport of plutonium back and forth to SRS from such sites as the Pantex Plant in Texas and the Los Alamos Lab must be analyzed in the draft EIS.

Waste isolation & disposal

The draft EIS needs to disclose all radioactive and toxic waste streams and how they will be disposed of in a way that protects communities and environment for as long as they remain hazardous. The State of South Carolina has been in a long legal struggle with the Department of Energy to not become the nation's *de facto* dumping ground for excess plutonium. The Draft EIS should address how expanded pit production will add to the existing inventory of 12 metric tons of plutonium that is already at SRS. It should also clarify what process would be put into place to ensure that if pit production were to begin and then stop that more plutonium would not be stranded at SRS.

Comprehensive health risk assessment

International agreements recognize that nuclear weapons, and their components “*have a disproportionate impact on women and girls, including as a result of ionizing radiation*”. All analyses and health impact assessments in the draft EIS must address and disaggregate the risks of waste streams and plutonium management (including criticality risks) to all, including pregnant women, fetuses, children and the elderly.

Transparency

All draft SRS EIS reference documents must be made accessible online.

Conclusion

Again, PAX supports the No Action Alternative, as there are a myriad of reasons not to produce new plutonium pits, and a marked lack of justification to risk human health and environment only to contribute to an illegal and illegitimate new nuclear arms race.

Sincerely,

Mrs. Susi Snyder

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