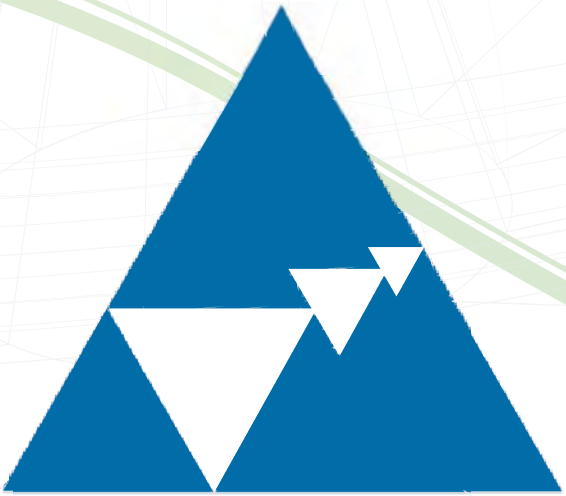
NNSA
National Nuclear Security Administration

DOE/EIS-0236-S4

Final Complex Transformation Supplemental Programmatic Environmental Impact Statement

Volume III, Part 1 of 2
Comment Response Document



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ABSTRACT: The National Nuclear Security Administration (NNSA), an agency within the Department of Energy, has the responsibility to maintain the safety, security, and reliability of the United States' nuclear weapons stockpile. This Complex Transformation Supplemental Programmatic Environmental Impact Statement (SPEIS) analyzes the potential environmental impacts of reasonable alternatives to continue transformation of the nuclear weapons complex to be smaller, and more responsive, efficient, and secure in order to meet national security requirements. The current Complex consists of sites located in seven states (California, Missouri, Nevada, New Mexico, South Carolina, Tennessee, and Texas). This SPEIS evaluates alternatives that would restructure special nuclear materials manufacturing and research and development facilities; consolidate special nuclear materials throughout the Complex; consolidate, relocate, or eliminate duplicative facilities and programs and improve operating efficiencies; and identify one or more sites for conducting NNSA flight test operations.

COOPERATING AGENCIES: The Department of the Air Force and the U.S. Army Garrison White Sands are cooperating agencies in the preparation of this Complex Transformation SPEIS.

PUBLIC COMMENTS: The Draft Complex Transformation SPEIS was issued for public review and comment on January 11, 2008. Comments on the Draft SPEIS were requested during a period of 90 days following publication of the U.S. Environmental Protection Agency's (EPA's) Notice of Availability in the *Federal Register*. Twenty public hearings to solicit comments on the Draft SPEIS were held during the public comment period. Prior to the end of this comment period, NNSA extended the public comment period by 20 additional days, until April 30, 2008. All comments received during the comment period were considered during preparation of the Final SPEIS. Late comments were also considered, to the extent practicable.

The Final SPEIS contains revisions and new information based in part on comments received on the Draft SPEIS. Vertical change bars in the margins indicate the locations of these revisions and new information. Volume 3 contains the comments received during the public comment period on the Draft SPEIS and NNSA's responses to the comments. NNSA will use the analysis presented in this Final SPEIS, as well as other information, in preparing the Record(s) of Decision (RODs) regarding Complex Transformation. NNSA will issue one or more RODs no sooner than 30 days after the EPA publishes a Notice of Availability of this Final SPEIS in the *Federal Register*. This document and related information are available on the Internet at www.ComplexTransformationSPEIS.com.

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ACRONYMS AND ABBREVIATIONS

A/D	Assembly/Disassembly
A/D/HE	Assembly/Disassembly/High Explosives
AC and MC	Analytical Chemistry and Materials Characterization
ACE	Altamont Commuter Express
ACHP	Advisory Council on Historic Preservation
ACRR	Annular Core Research Reactor
AEC	Atomic Energy Commission
AFB	Air Force Base
AF&F	Arming, Fuzing, and Firing
ALARA	as low as reasonably achievable
ALCM	Air-Launch Cruise Missile
ALOHA	Aerial Location of Hazardous Atmospheres
AQCR	Air Quality Control Region
ARF	airborne release fraction
ASER	annual site environmental report
ATEC	U.S. Army Test Evaluation Command
BA	Biological Assessment
BAAQMD	Bay Area Air Quality Management District
BACMs	Best Available Control Measures
BEA	Bureau of Economic Analysis
BEEF	Big Explosives Experimental Facility
BEIR	Biological Effects of Ionizing Radiation
Bison-m	Biota Information System of New Mexico
BLM	Bureau of Land Management
BLS	Bureau of Labor Statistics
BMAP	Biological Monitoring and Abatement Program
BMPs	Best Management Practices
BNM	Bandelier National Monument
CA	Composite Analysis
CAA	*Clean Air Act*
CAIRS	Computerized Accident/Incident Reporting System
CAMU	corrective action management unit
CASSC	California Species of Special Concern
CAUs	Corrective Action Units
CD-0	critical decision on mission need
CEQ	Council on Environmental Quality
CERCLA	*Comprehensive Environmental Response, Compensation, and Liability Act*
CFF	Contained Firing Facility
CFR	Code of Federal Regulations
CGTO	Consolidated Group of Tribes and Organizations
CHS	Center for Homeland Security
CIF	Consolidated Incineration Facility
CMR	Chemistry and Metallurgy Research

CMRR	Chemistry and Metallurgy Research Building Replacement Project
CNC	Consolidated Nuclear Center
CNPC	Consolidated Nuclear Production Center
CNPS	California Native Plant Society
Complex	nuclear weapons complex
Complex Transformation SPEIS	Complex Transformation Supplemental Programmatic Environmental Impact Statement
COPCs	contaminants of potential concern
CPC	Consolidated Plutonium Center
CRT	Cargo Restraint Transporter
CSAs	Canned Subassemblies
CUC	Consolidated Uranium Center
CWA	*Clean Water Act*
CWL	chemical waste landfill
CY	calendar year
D&D	Decontamination and Decommissioning
DA	design agency
DAF	Device Assembly Facility
DARHT	Dual Axis Radiographic Hydrodynamic Test
dB	decibel
dBA	A-weighted decibels
DAF	Device Assembly Facility
DCE	Distributed Centers of Excellence
DCGs	Derived Concentration Guidelines
DHHS	U.S. Department of Health and Human Services
DHS	U.S. Department of Homeland Security
DoD	U.S. Department of Defense
DOE	U.S. Department of Energy
DOI	U.S. Department of the Interior
DOT	U.S. Department of Transportation
DP	Defense Programs
DPE	data processing equipment
DR	damage ratio
DTC	Developmental Test Command
DTRA	Defense Threat Reduction Agency
DTSC	Department of Toxic Substances Control
DU	Depleted Uranium
DWPF	Defense Waste Processing Facility
DWTF	Decontamination and Waste Treatment Facility
DX	Dynamic Experimentation
EA	Environmental Assessment
ECF	Entry Control Facility
EDE	effective dose equivalent
EE	Energy Efficiency and Renewable Energy
EFPC	East Fork Poplar Creek
EH	Office of Environment, Safety and Health

EIS	Environmental Impact Statement
EM	Environmental Management
EMAC	Ecological Monitoring and Compliance Program
EOA	expanded operations alternative
EODU	Explosive Ordinance Disposal Unit
EOL	End-of-Life
EOS	Equation of state
EPA	U.S. Environmental Protection Agency
ER	Environmental Restoration
ERPG	Emergency Response Planning Guideline
ESL	Effects Screening Level
ETB	Engineering Test Bay
ETF	Environmental Test Facility
ETTP	East Tennessee Technology Park
EU	enriched uranium
EWTF	Explosives Waste Treatment Facility
FBI	Federal Bureau of Investigation
FE	facilities engineering
FGZ	fine-grain zone
FLAME	Fire Laboratory for Accreditation of Models and Experiments
FM	Farm-to-Market Road
FMD	Fissile Materials Disposition
FONSI	Finding of No Significant Impact
FPPA	*Farmland Protection Policy Act*
FTE	Full Time Employee
FWHM	Full Width at Half Maximum
FXR	Flash X-Ray
GCD	Greater Confinement Disposal
GIF	Gamma Irradiation Facility
GPD	gallons per day
GPS	Global Positioning System
GSA	General Services Area
GTS	Gas Transfer System
GWPP	groundwater protection program
HAN	hydroxylamine nitrate
HANDSS-55	“handling and segregation system for 55-gallon drums”
HANMF	H-Area New Manufacturing Facility
HAPs	Hazardous Air Pollutant
HE	High Explosives
HEAF	High Explosives Application Facility
HEPA	high-efficiency particulate air
HETB	Hardened Engineering Test Building
HEU	Highly Enriched Uranium
HEUMF	Highly Enriched Uranium Materials Facility
HEWTF	High Explosives Wastewater Treatment Facility
HI	Hazard Index

HLW	high level radioactive waste
HPS	Hantavirus Pulmonary Syndrome
HQ	Hazard Quotient
HR	Human Resources
HSC	Hazardous Materials Spill Center
HTM	High-Tech Mobile
HVAC	heating, ventilating, and air conditioning
HWDU	Hazardous waste disposal units
HWMF	hazardous waste management facility
HWSU	Hazardous Waste Storage Unit
HWTPF	Hazardous Waste Treatment and Processing Facility
HYDEC	hydride/dehydride casting
I	Interstate Highway
ICD-9-CM	International Classification of Disease, 9th Revision, Clinical Modification
ICRP	International Commission on Radiological Protection
IFF	Identification, Friend or Foe
IH	Industrial Hygiene
INEEL	Idaho National Engineering and Environmental Laboratory
INRAD	intrinsic radiation
IOM	Institution of Medicine
IPT	Integrated Project Team
ISCORS	Interagency Steering Committee on Radiation Standards
ISCST	Industrial Source Complex Short Term
ISD	Independent School District
ISM	Integrated Safety Management
ISMS	Integrated Safety Management System
ITRD	Innovative Treatment Remediation Demonstration
IWQPs	Inland Water Quality Parameters
JTA	Joint Test Assemblies
KAFB	Kirtland Air Force Base
KCP	Kansas City Plant
KCRIMS	Kansas City Responsive Infrastructure Manufacturing and Sourcing
KTF	Kauai Test Facility
LAC	Los Alamos County
LANL	Los Alamos National Laboratory
LANL SWEIS	Site-Wide Environmental Impact Statement for the Continued Operation of the Los Alamos National Laboratory
LANSCE	Los Alamos Neutron Science Center
LB/TS	Large Blast Thermal Simulator
LCF	latent cancer fatality
LDRGIF	Low Dose Rate Gamma Irradiation Facility
LLNL	Lawrence Livermore National Laboratory
LLW	low level waste
LOS	Level of Service

LPF	leak path factor
M&O	Management and Operations
MACCS	MELCOR Accident Consequence Code System
MACCS2	MELCOR Accident Consequence Code System Version 2
MACs	maximum allowable concentrations
MAR	material at risk
MBTA	*Migratory Bird Treaty Act*
MC&A	Material Control and Accountability
MCL	maximum contaminant level
MDC	maximum detectable concentration
MDL	maximum detection limit
MEI	maximally exposed individual
MEK	methyl ethyl ketone
MLLW	mixed low level waste
MOX	Mixed Oxide
MPF	Modern Pit Facility
MPF EIS	Modern Pit Facility Environmental Impact Statement
mrem	millirem
MRTFB	Major Range and Test Facility Base
MSGP	Multi-Sector General Permit
MVAs	motor vehicle accidents
MVM	million vehicle miles
MWDU	Mixed Waste Disposal Unit
NAAQS	National Ambient Air Quality Standards
NAFB	Nellis Air Force Base
NC	numerically controlled
NCRP	National Council on Radiation Protection Measurements
NDA	nondestructive assay
NDEP	Nevada Division of Environmental Protection
NE	Office of Nuclear Energy
NECI	Northeast Center Impact Area
NEP	Nuclear Explosive Package
NEPA	*National Environmental Policy Act*
NESHAP	National Emission Standards for Hazardous Air Pollutants
NEST	Nuclear Emergency Search Team
NGPF	Neutron Generator Production
NHP	National Hydrotesting Program
NHPA	*National Historic Preservation Act*
NMAAQS	New Mexico Ambient Air Quality Standards
NMAQCR	New Mexico Air Quality Control Regulations
NMED	New Mexico Environment Department
NMWQCC	New Mexico Water Quality Control Commission
NN	Nonproliferation and National Security
NNSA	National Nuclear Security Administration
NOAA	National Oceanic and Atmospheric Administration
NOI	Notice of Intent

NPDES	National Pollutant Discharge Elimination System
NPL	National Priorities List
NPR	Nuclear Posture Review
NPS	National Park Service
NPT	Nuclear Nonproliferation Treaty
NPTEC	Nonproliferation Test and Evaluation Complex
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
NSO	Nevada Site Office
NSTec	National Security Technologies
NTS	Nevada Test Site
NTTR	Nevada Test and Training Range
NWS	National Weather Service
NWSM	Nuclear Weapons Stockpile Memorandum
NWSP	Nuclear Weapons Stockpile Plan
OB/OD	Open Burn/Open Detonation
OEPG	Office of Environmental Policy and Guidance
ORNL	Oak Ridge National Laboratory
ORPS	Occurrence Reporting and Processing System
ORR	Oak Ridge Reservation
OSHA	Occupational Safety and Health Administration
OST	Office of Secure Transportation
OUs	operable units
PA	Performance Assessment
PAAA	*Price-Anderson Amendments Act*
Pantex	Pantex Plant
PCBs	polychlorinated biphenyls
pCi/L	picocuries per liter
PDCF	Pit Disassembly and Conversion Facility
PF-4	Plutonium Facility, Building 4
PHERMEX	Pulsed High Energy Radiation Machine Emitting X-Rays
PHETS	Permanent High Explosive Test Site
PIDAS	Perimeter Intrusion Detection and Assessment System
PIXY	Pulse Intense X-Ray
PMDA	Plutonium Management and Disposition Agreement
POLs	petroleum, oils, lubricants
PPE	personal protective equipment
ppy	pits per year
PQL	practical quantitation limit
PSD	Prevention of Significant Deterioration
PSRs	Potential release sites
Pu	Plutonium
PUREX	Plutonium-Uranium Extraction Process
QASPR	Qualification Alternatives to Sandia Pulsed Reactor
R&D	Research and Development
RANT	Radioassay and Nondestructive Testing

RCRA	*Resource Conservation and Recovery Act*
rem	roentgen equivalent man
REOP	Real Estate Operating Permit
RF	respirable fraction
RFI	RCRA facility investigation
RIMSII	Regional Input-Output Modeling System
RLWTF	Radioactive Liquid Waste Treatment Facility
RMWMF	Radioactive and Mixed Waste Management Facilities
ROD	Record of Decision
ROGs/POCs	reactive organic gases/precursor organic compounds
ROI	Region of Influence
RRF	respirable release fraction
RRW	Reliable Replacement Warhead
RWMC	Radioactive Waste Management Complex
RWMS	Radioactive Waste Management Site
S.C.	South Carolina State Highway
SAAQS	State Ambient Air Quality Standards
SASN	Silver acetylide-silver nitrate
SCDHEC	South Carolina Department of Health and Environmental Control
SEAB	Secretary of Energy Advisory Board
SEIS	Supplemental Environmental Impact Statement
SFNF	Santa Fe National Forest
SGT	Safeguards Transporters
SHIST	Seismic Hardrock in Site Test
SHPO	State Historic Preservation Office
SJVUAPCD	San Joaquin Valley Unified Air Pollution Control District
SMR	standardized mortality rate
SNF	Spent nuclear fuel
SNL	Sandia National Laboratories
SNL/NM	Sandia National Laboratories/New Mexico
SNL/CA	Sandia National Laboratories/California
SNM	Special nuclear material
SPEIS	Supplemental Programmatic Environmental Impact Statement
SRARP	Savannah River Archaeological Research Program
SREL	Savannah River Ecology Laboratory
SRS	Savannah River Site
SS&C	sand, slag and crucible
SSM	Stockpile Stewardship and Management
SSM PEIS	Final Programmatic Environmental Impact Statement for Stockpile Stewardship and Management
SSO	Sandia Site Office
SSP	Stockpile Stewardship Program
SST	Safe Secure Trailers
STP	Site Treatment Plan
STS	Stock-to-Target Sequence
SVOC	Semi-volatile organic compound

SWEIS	Site-Wide Environmental Impact Statement
SWSC	Sanitary Wastewater Systems Consolidation
SWTF	Solid Waste Transfer Facility
T&E	Threatened and Endangered
TA	Technical Area
TA-55	Technical Area 55
TBF	Terminal Ballistics Facility
TBP	tributyl phosphate
TCEQ	Texas Commission on Environmental Quality
TCP	Traditional Cultural Property
TECC	Transportation and Emergency Control Center
TEDE	Total Effective Dose Equivalent
TEF	Tritium Extraction Facility
TLD	Thermoluminescent dosimeter
TNRCC	Texas Natural Resource Conservation Commission
TPCB	Transurance Pad Cover Building
TPDES	Texas Pollutant Discharge Elimination System
TRAGIS	Transportation Routing Analysis Geographic Information System
Trinity NHL	Trinity Site National Historic Landmark
TRU	transuranic
TRUPACT-II	Transuranic Package Transporter
TSCA	Toxic Substance Control Act
TSD	Transportation Safequards Division
TSP	total suspended particulates
TSPI	Time Space Positioning Information
TTR	Tonopah Test Range
TVA	Tennessee Valley Authority
UC	University of California
UPF	Uranium Processing Facility
US	United States
USACE	United States Army Corps of Engineers
USAF	United States Air Force
USC	United States Code
USFS	United States Forest Service
USFWS	United States Fish and Wildlife Service
USGS	United States Geologic Survey
USPHS	United States Public Health Service
UXO	unexploded ordnance
VOC	volatile organic compound
VPP	Voluntary Protection Program
WAC	Waste Acceptance Criteria
WCRRF	Waste Compaction, Reduction, and Repackaging Facility
WEF	Waste Examination Facility
WETF	Weapons Engineering Tritium Facility
WFO	Work for Others
WIPP	Waste Isolation Pilot Plant

WSMR	White Sands Missile Range
WSRC	Washington Savannah River Company
WTG	Weapons Test Group
WVDP	West Valley Demonstration Project
WWTF	Wastewater Treatment Facility
XTF	Cross-wind Fire Facility
Y-12	Y-12 National Security Complex

CHEMICALS AND UNITS OF MEASURE

Bq	Becquerel
C	Celsius
Ci	curie
cm	centimeters
CFC	chlorofluorocarbons
CO	carbon monoxide
dB	decibel
dBA	decibel A-weighted
DCE	1, 2-dichloroethylene
DNA	deoxyribonucleic acid
F	Fahrenheit
ft	feet
ft^2	square feet
ft^3	cubic feet
ft^3/s	cubic feet per second
g	grams
gal	gallons
ha	hectares
hr	hour
in	inches
kg	kilograms
km	kilometers
km^2	square kilometers
kV	kilovolts
kVA	kilovolt-ampere
kW	kilowatts
kWh	kilowatt hours
L	liters
lb	pounds
m	meters
m^2	square meters
m^3	cubic meters
m/s	meters per second
mg	milligram (one-thousandth of a gram)
mg/L	milligrams per liter
MGD	million gallons per day

MGY	million gallons per year
mi	miles
mi^2	square miles
mph	miles per hour
mrem	millirem (one-thousandth of a rem)
MVA	megavolt-ampere
MW	megawatt
MWe	megawatt electric
MWh	megawatt hour
NO_2	nitrogen dioxide
NOX	nitrogen oxides
O_3	ozone
Pb	lead
PCB	polychlorinated biphenyl
pCi	picocurie (one-trillionth of a curie)
pCi/L	picocuries per liter
PM_{10}	particulate matter (less than 10 microns in diameter)
ppb	parts per billion
ppm	parts per million
ppbv	parts per billion by volume
rem	roentgen equivalent man
s	seconds
SO_2	sulfur dioxide
T	short ton
t	metric tons
TCA	1, 1, 1-trichloroethane
TCE	trichloroethylene
yd^3	cubic yards
yr	year
µCi	microcurie (one-millionth of a curie)
µCi/g	microcuries per gram
µg	microgram (one-millionth of a gram)
µg/kg	micrograms per kilogram
µg/L	micrograms per liter
$\mu g/m^3$	micrograms per cubic meter

CONVERSION CHART

To Convert Into Metric			To Convert Into English		
If You Know	**Multiply By**	**To Get**	**If You Know**	**Multiply By**	**To Get**
Length					
inch	2.54	centimeter	centimeter	0.3937	inch
feet	30.48	centimeter	centimeter	0.0328	feet
feet	0.3048	meter	meter	3.281	feet
yard	0.9144	meter	meter	1.0936	yard
mile	1.60934	kilometer	kilometer	0.62414	mile
Area					
square inch	6.4516	square centimeter	square centimeter	0.155	square inch
square feet	0.092903	square meter	square meter	10.7639	square feet
square yard	0.8361	square meter	square meter	1.196	square yard
acre	0.40469	hectare	hectare	2.471	acre
square mile	2.58999	square kilometer	square kilometer	0.3861	square mile
Volume					
fluid ounce	29.574	milliliter	milliliter	0.0338	fluid ounce
gallon	3.7854	liter	liter	0.26417	gallon
cubic feet	0.028317	cubic meter	cubic meter	35.315	cubic feet
cubic yard	0.76455	cubic meter	cubic meter	1.308	cubic yard
Weight					
ounce	28.3495	gram	gram	0.03527	ounce
pound	0.45360	kilogram	kilogram	2.2046	pound
short ton	0.90718	metric ton	metric ton	1.1023	short ton
Force					
dyne	0.00001	newton	newton	100,000	dyne
Temperature					
Fahrenheit	Subtract 32 then multiply by 5/9ths	Celsius	Celsius	Multiply by 9/5ths, then add 32	Fahrenheit

METRIC PREFIXES

Prefix	Symbol	Multiplication Factor
exa-	E	1 000 000 000 000 000 000 = 10^{18}
peta-	P	1 000 000 000 000 000 = 10^{15}
tera-	T	1 000 000 000 000 = 10^{12}
giga-	G	1 000 000 000 = 10^{9}
mega-	M	1 000 000 = 10^{6}
kilo-	k	1 000 = 10^{3}
hecto-	h	l00 = 10^{2}
deka-	da	l0 = 10^{1}
deci-	d	0.1 = 10^{-1}
centi-	c	0.01 = 10^{-2}
milli-	m	0.001 = 10^{-3}
micro-	µ	0.000 001 = 10^{-6}
nano-	n	0.000 000 001 = 10^{-9}
pico-	p	0.000 000 000 001 = 10^{-12}
femto-	f	0.000 000 000 000 001 = 10^{-15}
atto-	a	0.000 000 000 000 000 001 = 10^{-18}

Comment Response Document, Chapter 1
PUBLIC COMMENT PROCESS

Comment Response Document, Chapter 1
PUBLIC COMMENT PROCESS

This chapter of the Comment Response Document describes the public comment process for the Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement *(SPEIS) and the procedure used in responding to those comments. Section 1.1 describes t*he *means through which comments were acquired, summarized, and numbered. Section 1.2 discusses the public hearing format that was used to gather comments from the public. Section 1.3 describes the organization of this document as well as how the comments were categorized, addressed, and documented. Section 1.4 provides guidance on the use of this document to assist the reader. The chapter concludes with a discussion of the major comments on (Section 1.5), and changes to (Section 1.6), the Draft Complex Transformation SPEIS resulting from the public comment process.*

1.1 INTRODUCTION

In January 2008, the National Nuclear Security Administration (NNSA) published the *Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement* (SPEIS), which analyzes the potential environmental impacts associated with alternatives to make the U.S. nuclear weapons complex (Complex) smaller, and more responsive, efficient, and secure (73 FR 2023). The Draft Complex Transformation SPEIS builds upon decisions made in the 1990s following the end of the Cold War and the cessation of U.S. underground nuclear weapons testing. The Draft Complex Transformation SPEIS analyzes both programmatic and project-specific alternatives. The programmatic alternatives involve the restructuring of facilities that use or store special nuclear material (SNM). These facilities produce plutonium components (commonly called pits), produce highly-enriched uranium (HEU) components (commonly called secondaries), and assemble and disassemble nuclear weapons (including related high explosive component fabrication). The project-specific alternatives addressed in this SPEIS deal with restructuring research and development (R&D) and testing facilities.

The 90-day public comment period for the Draft Complex Transformation SPEIS began on January 11, 2008, and was scheduled to end on April 10, 2008 (73 FR 2023). On April 11, 2008, NNSA announced in the *Federal Register* that it was extending the comment period until April 30, 2008 (73 FR 19829). All comments received were considered.

During the comment period, 20 public hearings were held in the following locations: North Augusta, SC (two hearings), Oak Ridge, TN (two hearings), Amarillo, TX (two hearings), Tonopah, NV (one hearing), Las Vegas, NV (two hearings), Socorro, NM (one hearing), Albuquerque, NM (two hearings), Los Alamos, NM (two hearings), Santa Fe, NM (one hearing), Tracy, CA (one hearing), Livermore, CA (two hearings), Washington, DC (one hearing), and Española, NM (one hearing). Figure 1.1–1 shows the locations and dates of the hearings.

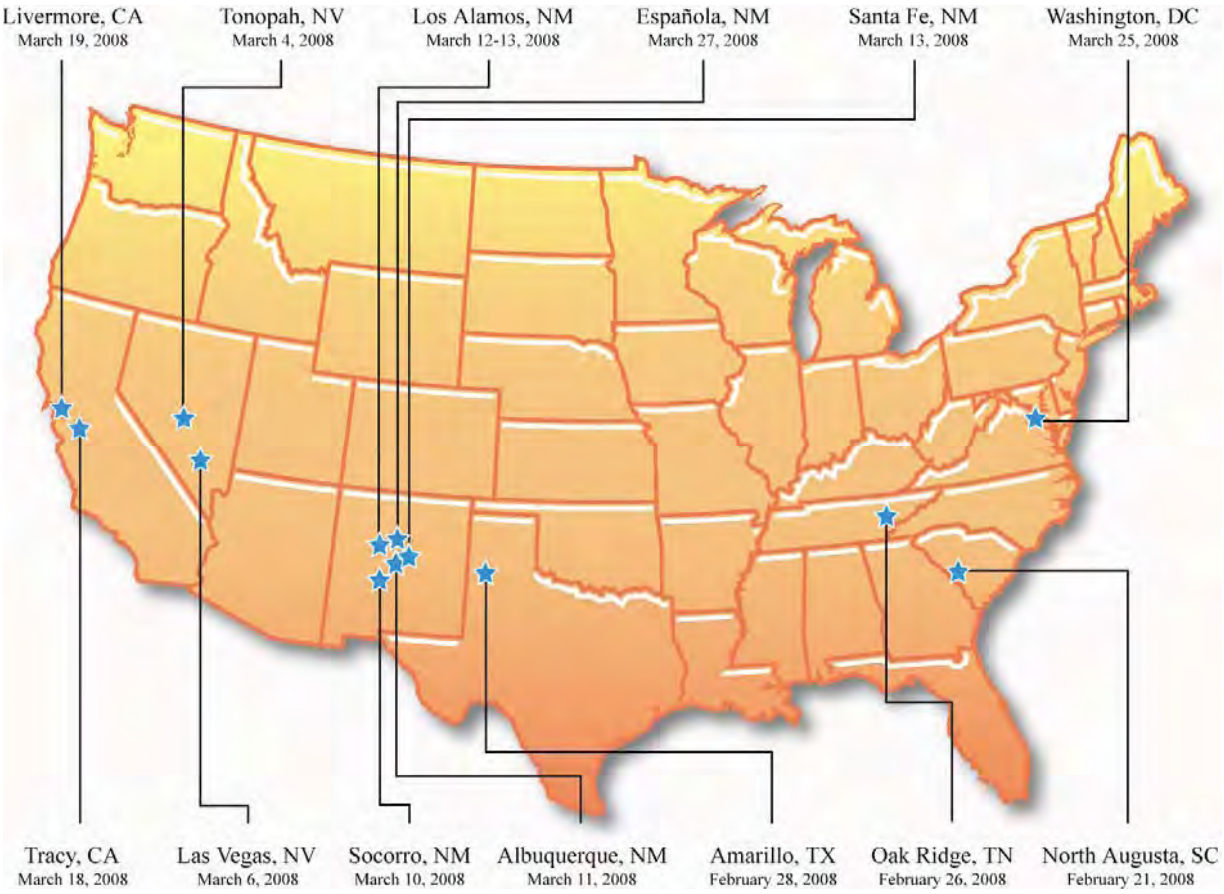

Figure 1.1–1—Public Hearing Locations and Dates

Attendance at each hearing, together with the number of comments recorded, is presented in Table 1.1–1. Attendance numbers are based on the number of participants who completed and returned registration forms and may not include all of those present at the hearings.

Table 1.1–1—Public Hearing Locations, Attendance, and Number of Comments

Hearing Location	Total Attendance	Comments
Albuquerque, NM (Afternoon Session)	77	123
Albuquerque, NM (Evening Session)	49	130
Amarillo, TX (Afternoon Session)	31	88
Amarillo, TX (Evening Session)	14	38
Espanola, NM (Evening Session)	137	216
Las Vegas, NV (Afternoon Session)	17	62
Las Vegas, NV (Evening Session)	18	68
Livermore, CA (Afternoon Session)	91	230
Livermore, CA (Evening Session)	67	179
Los Alamos, NM (Evening Session)	100	108
Los Alamos, NM (Afternoon Session)	69	137
North Augusta, SC (Afternoon Session)	62	297
North Augusta, SC (Evening Session)	13	68

Table 1.1–1—Public Hearing Locations, Attendance, and Number of Comments

Hearing Location	Total Attendance	Comments
Oak Ridge, TN (Afternoon Session)	69	298
Oak Ridge, TN (Evening Session)	32	123
Santa Fe, NM (Evening Session)	210	326
Socorro, NM (Evening Session)	22	56
Tonopah, NV (Evening Session)	50	32
Tracy, CA (Evening Session)	38	116
Washington, DC (Afternoon session)	118	221

In addition, the public was encouraged to provide comments via mail, facsimile, or electronically via e-mail or the project web site (www.complextransformationspeis.com). Comments received by mail and facsimile were date stamped. Comments received by e-mail or the project web site have the date automatically included. Chapter 2 of this volume contains a copy of the comment documents NNSA received as well as a summary of the oral comments made at the public hearings. Table 1.1–2 provides an overview of the number of documents and comments submitted by each method.

Table 1.1–2—Document Submission Overview

Method	Documents Received
E-mails (individuals)	977
E-mails (campaign)	~90,000
Fax	17
Hand-ins at public hearings	98
Letter/Postcard Campaigns	10,295
Mail-in	353
Hearing Transcripts	20

1.2 PUBLIC HEARING FORMAT

Each public hearing began with an open house format to facilitate interaction with the public and to provide information and respond to questions. The open house was followed by a traditional hearing session, during which a neutral facilitator ensured that all attendees had an opportunity to provide comments and kept the meeting on schedule. A court reporter prepared a verbatim transcript of the proceedings and recorded all comments presented by the public.

The format used for each hearing included a video presentation on Complex Transformation from Mr. Robert Smolen, NNSA Assistant Administrator for Defense Programs, and a presentation by the Complex Transformation SPEIS Document Manager. That presentation included a summary of the Complex Transformation Draft SPEIS and a discussion of the *National Environmental Policy Act* (NEPA) process. The facilitator then opened the hearing for comments. Attendees who wished to speak at the hearing were required to sign up on a speakers' list. Federal- and state-wide elected representatives attending the hearings were afforded priority to speak. Locally-elected officials were alternated with other attendees who spoke on a "first come" basis according to their order on the speakers' list.

1.3 ORGANIZATION OF THIS COMMENT RESPONSE DOCUMENT

This Comment Response Document (CRD) has been organized into the following sections:

- Chapter 1 describes the public comment process and contains tables with: the list of attendees at the public hearings; an index of commentors who submitted comments; and the comment document and response locators to assist readers with using this CRD. NNSA received nearly 100,000 comment documents related to the Draft Complex Transformation SPEIS. The majority of these comment documents were in the form of campaign e-mails, letters, and postcards that contained identical or similar substantive comments. Because it would be impractical to list and print the names of all of the commentors who submitted campaign e-mails, letters, and postcards, those names are provided electronically in the CD version of this SPEIS and on the Complex Transformation SPEIS web site (www.complextransformationspeis.com).

- Chapter 2 contains scanned copies of comment documents received during the public comment period, and also includes a summary of the oral comments received during the public hearings. Because the transcripts from the public hearings are very lengthy, they are not reproduced in this CRD. However, electronic copies of those transcripts, along with the specific comments from those transcripts, can be found in the CD version of this SPEIS and on the Complex Transformation SPEIS web site.

- Chapter 3 contains summaries of all comments organized by topic and DOE responses to those comments.

Tables are provided at the end of this chapter to assist commentors and other readers in locating individual comments. Individual comments were identified within each comment document and categorized by issue (e.g., nuclear weapons policy, land use, air quality, etc.). Table 1.3–1 lists the issue categories and corresponding issue codes. Similar comments within the same issue category were then summarized, and these summaries are presented in Chapter 3 of this CRD along with NNSA's responses to the comments.

Table 1.3–2 identifies the individuals who attended public hearings and the pages where comments from those hearings appear. Table 1.3–3 identifies the individuals who presented comments at the hearings. Commentors interested in locating their comment document and reviewing how it was coded can use Tables 1.3–4 through 1.3–7. Table 1.3–4 lists members of the general public who submitted comments alphabetically by last name. Table 1.3–5 lists state and local officials and agencies, companies, organizations, and special interest groups that submitted comments. The commentors in Table 1.3–5 are listed by organization in alphabetical order with the names of the particular individuals who submitted those documents. Table 1.3-6 lists the multi-signatory documents (i.e., those signed by more than one individual). Table 1.3-7 lists the campaign comment documents. These campaigns were conducted by various organizations and special interest groups to encourage individuals to separately submit the same or substantively similar comments. Only one copy of each campaign document is included in Chapter 2. The page number given in Tables 1.3–2 through 1.3–7 refers to the first page on which the comment document appears.

Table 1.3–8 is organized by issue category. Using the appropriate issue code, commentors can locate all of the comments that are reflected in each summary. The table lists the pages in Chapter 2 of this CRD on which the comments that have been summarized appear in the relevant comment documents. Table 1.3–8 and Chapter 3 subdivide some issue categories to account for differences among the comments related to the same general issue. For example, Water Resources is assigned issue code 14.E. However, several comments related to water resources are best addressed discretely (e.g., those dealing with site-specific issues), and so these are assigned codes 14.E.1, 14.E.2, etc.

1.4 HOW TO USE THIS COMMENT RESPONSE DOCUMENT

Begin by locating the commentor's name in Tables 1.3–3, 1.3–4, 1.3–5, or 1.3–6, as appropriate. These tables list the page number on which that commentor's document appears in Chapter 2. To see what issue codes were assigned to the comments identified within a document, locate the document in Chapter 2. Chapter 2 contains scans of the document with sidebars identifying the issue code assigned to each comment. Chapter 3 contains comment summaries and responses to the comments identified in Chapter 2.

For example, if Ms. Hope Carr wanted to track her comments, she would go to Table 1.3–4 to find her name, and the corresponding page on which her comment document appears in Chapter 2 (page 2-149). On page 2-149, Ms. Carr would find that her scanned document has been side-barred and coded 16.A for the first comment and 1.C for the second comment. After obtaining the issue codes from the scanned document, Ms. Carr could go to Chapter 3, locate those issue codes, and read the responses. For example, the first comment was assigned issue code 16.A. She would then go to Chapter 3 and find the response to issue 16.A on page 3-211. The second comment was assigned issue code 1.C. She would go to Chapter 3 and find the response to issue 1.C on page 3-4. Ms. Carr could use Table 1.3–8 to locate the page numbers on which other comments that address the same issues appear in Chapter 2.

1.5 MAJOR COMMENTS RECEIVED DURING THE PUBLIC COMMENT PERIOD ON THE DRAFT COMPLEX TRANSFORMATION SPEIS

Approximately 100,000 comment documents (including approximately 98,000 comment documents as part of 40 e-mail, letter, and postcard campaigns) were received from individuals, interested groups, tribal governments, and Federal, state, and local agencies during the public comment period on the Draft Complex Transformation SPEIS. In addition, approximately 1,000 comment documents were received via e-mail and approximately 625 commentors spoke at the 20 public hearings. The majority of the comments focused on policy issues related to the appropriateness or the need for nuclear weapons. The major comments, along with the issue code where responses to these comments can be found in Chapter 3, included the following:

- The majority of commentors stated opposition to nuclear weapons and transformation of the nuclear weapons complex because:
    - The United States is not in compliance with Article VI of the Nonproliferation Treaty (see issue code 1.F);

  - Nuclear weapons lead to nuclear weapons proliferation (see issue code 1.J);
  - Nuclear weapons are immoral (see issue code 20);
  - Nuclear weapon activities make NNSA sites and surrounding communities more at risk to accidents and terrorist activities (see issue code 13);
  - Nuclear weapons take money away from the clean-up of sites already contaminated (see issue code 9.B);
  - More nuclear weapon activities will produce contamination at NNSA sites (see issue code 14.M); or
  - Nuclear weapon activities result in adverse health and safety impacts in communities surrounding NNSA sites (see issue code 14.K).

- Many commentors stated that the 2001 Nuclear Posture Review does not reflect the changed threat environment since September 11, 2001, and should not be utilized by NNSA in establishing or defining programmatic requirements. Commentors stated that Complex Transformation should not proceed before a new Nuclear Posture Review is completed in 2009 by the incoming Administration, as required by the Congress. NNSA's "transformation" proposal should be withdrawn until then (see issue code 1.C).

- Many commentors felt that there are better ways in which taxpayers' money could be spent, such as: feeding the poor, providing better housing for the poor, performing energy efficiency research and development, and cleaning up contaminated sites (see issue code 9.B).

- Many commentors stated that there was no need to build any nuclear weapons and NNSA failed to consider an alternative that would provide a nuclear weapons complex that would manufacture no nuclear weapons. Many commentors stated that NNSA should operate only those facilities needed for the safe, secure, efficient disassembly and dismantlement of nuclear weapons and the disposition/disposal of their constituent parts. Many commentors stated that NNSA should include a No Production Alternative in the SPEIS that would pursue dismantlement and refrain from further nuclear weapons design and production (see issue codes 3.A, 3.C, and 7.O).

- Many commentors questioned the need for new pit production (see issue code 5.C).

- Many commentors were opposed to the Reliable Replacement Warhead (RRW) Program. Many commentors felt the RRW Program was just an excuse to develop new design nuclear weapons (see issue codes 1.D and 8.A).

- Many commentors stated that the non-nuclear activities at the Kansas City Plant (KCP) should be included in the SPEIS. Commentors stated that KCP is an integral part of the nuclear weapons complex and therefore alternatives for its consolidation and modernization should be considered in the SPEIS rather than in a separate Environmental Assessment. By excluding alternatives involving activities currently performed at KCP, commentors stated that NNSA was not accurately representing the impacts of the entire nuclear weapons complex (see issue code 12).

- Several Native American groups (the Santa Clara Pueblo, Pueblo de San Ildefonso, and the Western Shoshone National Council) submitted comments on the Draft SPEIS. Some of the major comments from these groups focused on the need for government-to-government consultations prior to the issuance of a ROD, and a more detailed analysis of environmental impacts on tribal lands that cannot be avoided. In addition, the Santa Clara Pueblo commented that the new administration will be required to perform a new Nuclear Posture Review. The Santa Clara Pueblo also stated that the version of the CAP-88 computer model used to estimate human health impacts was dated, that the newest version should be used, and that even this model does not assess exposure pathways unique to tribal members. Other tribal comments stated that the Draft SPEIS ignored past contamination issues, that there is no waste disposal path for transuranic waste, and that impacts to specific tribal lands were not analyzed, especially with respect to rivers and other water resources. The Western Shoshone commented that their treaty claims had not been considered (see issue code 14.J.5).

1.6 MAJOR CHANGES FROM THE DRAFT COMPLEX TRANSFORMATION SPEIS

In response to comments received on the Draft Complex Transformation SPEIS, to include data not available at the time of the development of the Draft SPEIS, and to correct errors and omissions, NNSA made changes to the Draft Complex Transformation SPEIS. The Summary and Volumes I and II of this Final Complex Transformation SPEIS contain changes, which are indicated by a vertical sidebar in the margin. A summary and discussion of the more significant changes are provided below.

- In response to the numerous comments requesting a No Production Alternative, NNSA added a No Net Production/Capability-Based Alternative to Section 3.6 of the Final SPEIS. Chapter 5 of the SPEIS includes an analysis of the potential impacts of the No Net Production/Capability-Based Alternative (see issue code 7.O).

- Several commentors stated that the cumulative impact of nuclear-related weapons activities at three sites within a few hundred miles of each other in New Mexico needs to be considered, especially since the 50-mile radius analysis of impacts of Los Alamos National Laboratory (LANL) and Sandia National Laboratories/New Mexico (SNL/NM) overlap. In response to these comments, NNSA has added a new section (Section 6.4) to provide more information on the potential cumulative impacts of nuclear-related activities in New Mexico. This analysis considers nuclear-related activities at LANL, SNL/NM, the Waste Isolation Pilot Plant (WIPP) near Carlsbad, and the National Enrichment Facility in Lea County (see issue code 1.4O).

- One commentor noted that NNSA used an outdated version of CAP-88, an atmospheric transport model designed by the Environmental Protection Agency (EPA), to estimate dose and risk from radionuclide air emissions as part of *Clean Air Act* compliance. The Draft SPEIS used EPA's 1992 version of the CAP-88 model (Version 1.0). According to EPA, users "may use any of the three versions of CAP-88 for enforcement purposes. To allow for updates and refinement of the software, Subpart H of 40 CFR Part 61 does not specify any version. However, because Version 3 incorporates the latest science and is

more versatile than the older versions, it is recommended" (EPA 2008). As a result, NNSA has revised the dose calculations using the CAP-88, Version 3, software. As shown in Chapter 5, all doses from normal operations are expected to remain below regulatory standards (see issue code 14.K.19).

- NNSA received many comments on the project-specific flight test alternatives. Many commentors stated that an earlier NNSA study indicated that a high-tech mobile option at Tonopah was at least $20 million less than a high-tech mobile at White Sands Missile Range (WSMR). Other com-mentors stated that DOE's own business case report states that Tonopah Test Range (TTR) is the most favorable alternative. Numerous commentors stated that closure of TTR would result in economic disaster for the community of Tonopah as well as surrounding communities which rely on the social and health amenities of Tonopah. In response to these comments, NNSA has added additional socioeconomic information to Section 5.15.4.2.2, and has updated the alternative referred to as the "Campaign Mode Operation of TTR". For this alternative, NNSA has added several options that would maintain the flight test operations at TTR, but with reduced full-time employment that would be supplemented with staff from SNL/NM and upgraded equipment. Details of this alternative may be found in Section 3.10.3 of the Final SPEIS (see issue code 6.C.1).

- NNSA received many comments stating that the water usage and quality data for LANL and the Savannah River Site (SRS) were outdated and unrepresentative. As a result, NNSA revised the water usage and water quality sections at LANL and SRS (sections 4.1.5 and 4.8.5, respectively) (see specific comments within issue code 14.E).

- Several commentors indicated that the presentation of the preferred alternative was confusing, not well presented, and did not provide sufficient specific discussion of the environmental impacts of the preferred alternative compared to other alternatives. In response to these comments, NNSA has added Section 5.20 to discuss the impacts of the preferred alternative specifically (see issue code 7.N).

- Some commentors stated that the tritium production activities should be included in the SPEIS in order to represent the impacts of the entire nuclear weapons complex. Commentors also stated that the Watts Bar reactors are part of the nuclear weapons Complex. In response to these comments, NNSA has added a summary of the environmental impacts of producing tritium in TVA reactors (see Section 5.19). Additionally, the SPEIS includes an analysis (Section 5.19) of how these impacts would change if tritium were not produced in these reactors, as envisioned by the No Net Production/Capability-Based Alternative (see issue code 5.A).

- Some commentors stated that radiation exposure can also cause nonfatal cancers and genetic disorders, yet the SPEIS only estimates potential fatal cancers. Because fatal cancer is the most probable serious effect of environmental and occupational radiation exposures, this SPEIS presents estimates of latent cancer fatalities (LCFs) rather than cancer incidence. The numbers of LCFs can be used to compare the risks among the various alternatives. Nonfatal cancers and genetic effects, which are less probable

consequences of radiation exposure, can be estimated by comparing them with the LCF estimates. In response to the comment, NNSA added a table to Appendix C to assist with estimating those nonfatal cancer consequences (see issue code 14.K.4).

- Several commentors stated that the cumulative impacts of future activities at Lawrence Livermore National Laboratory (LLNL) Site 300 must be analyzed in the Complex Transformation SPEIS. Commentors stated that DOE recently filed an application for an air permit with the San Joaquin Valley Air Pollution Control District for increased activities over current levels. Commentors stated that the environmental impacts of these activities, whether conducted by the Department of Defense (DoD) or the Department of Homeland Security, should be analyzed in the Complex Transformation SPEIS. NNSA has added additional discussion of these operations at LLNL Site 300, specifically addressing the additional activities associated with the air permit requests referenced by the commentor. This additional information may be found in Section 4.2.4.1.5 of this Final SPEIS (see issue code 14.O.4).

- NNSA has also added an option that would construct a smaller underground storage facility in Zone 12 at Pantex (see Section 3.7.3) (issue code 5.N.2[1]).

- In the Draft SPEIS, a 9,000 square feet addition to the CMRR was evaluated as a means to support consolidation of plutonium operations to LANL from LLNL, provide increased analytical chemistry support for increased pit production capacity, and ensure sufficient nuclear space as a contingency. Subsequent to that assessment, NNSA decided that the 9,000 additional square feet would be unnecessary for the consolidation of plutonium activities. Therefore, an addition of 9,000 square feet to the CMRR is no longer being pursued (see issue code 5.C.6).

Table 1.3-1—Issue Codes and Categories

Issue Code	Issue Category
1.0	Nuclear Weapon Policies - General
1.A	World Court
1.B	Presidential Directives, Public Law, and Current Policies
1.C	Nuclear Posture Review
1.D	New Weapons Design
1.E	Comprehensive Test Ban Treaty
1.F	Treaty on the Nonproliferation of Nuclear Weapons
1.G	Moscow Treaty
1.H	Department of Defense Involvement
1.I	Not Used

[1] Although no public comments were received on this issue, issue code 5.N.2 deals with special nuclear material storage in Zone 12 at Pantex.

Table 1.3-1—Issue Codes and Categories

Issue Code	Issue Category
1.J	Proliferation and Nonproliferation
1.K	Current Administration Policy
1.L	International Relations
1.M	Not Used
1.N	Nuclear Power in the United States
1.O	War on Terror
1.P	International Atomic Energy Agency Inspections
1.Q	Underground Testing
2.0	NEPA Process
2.A	General NEPA Process and Compliance
2.B	PEIS Versus New PEIS
2.C	Stakeholder Involvement
2.D	Process Notification
2.E	Length of Comment Period, Number and Location of Public Hearings
2.F	Public Hearings and Fact Sheets
2.G	Public Hearing Process
2.H	Availability of Information
2.I	NEPA Compliance
2.J	Specific Editorial Comments on the SPEIS
2.K	Specific Comments – Chapters 1 Through 3
3.0	Purpose and Need
3.A	General
3.B	Not Used
3.C	Need for Complex Transformation
3.D	Not Used
3.E	Stockpile Questions – General
4.0	Programmatic No Action Alternative
4.A	
5.0	Programmatic Alternatives
5.A	Other Programmatic Alternatives
5.B	Development of Programmatic Alternatives
5.C	Distributed Centers of Excellence
5.D	Consolidated Nuclear Production Center

Table 1.3-1—Issue Codes and Categories

Issue Code	Issue Category
5.E	Alternative for a Smaller CNPC
5.F	Programmatic Alternative 3: Capability-Based
5.G	Downsizing-in-place
5.H	Alternatives Discussed, but not analyzed in detail
5.I	Processing or Handling of Plutonium
5.J	Processing or Handling of Uranium
5.K	Not Used
5.L	Processing or Handling of Radioactive Isotopes
5.M and 5.N	SNM Consolidation and Disposal of Special Nuclear Material
6.0	Project Alternatives
6.A	High Explosives R&D
6.B	Tritium R&D
6.C	NNSA Flight Test Operations
6.D	Major Hydrodynamic Test Facilities
6.E	Major Environmental Test Facilities
7.0	Other Comment Concerning Alternatives or NNSA Program Functions
7.A	Other Alternatives - General
7.B	Transportation of Nuclear Materials
7.C	Not Used
7.D	Not Used
7.E	Security Concerns
7.F	Safety Concerns
7.G	Not Used
7.H	Not Used
7.I	Not Used
7.J	Site Cleanup
7.K	New Triad
7.L	Not Used
7.M	Proposed Future of the Nuclear Weapons Complex
7.N	Preferred Alternative
7.O	No Production Alternative
8.0	Reliable Replacement Warhead
8.A	Reliable Replacement Warhead - General

Table 1.3-1—Issue Codes and Categories

Issue Code	Issue Category
8.B	Opposition to Reliable Replacement Warhead
8.C	Not Used
8.D	Not Used
8.E	Relationship between Reliable Replacement Warhead and Complex Transformation
8.F	Need for Reliable Replacement Warhead
9.0	Cost and Schedule
9.A	Cost-effectiveness of Existing Nuclear Weapons Complex
9.B	Better Use of Resources
9.C	Factors that Could Increase Proposed Costs
9.D	Costs of Cleanup
9.E	Costs of Alternatives
9.F	Cost-Benefit Study
9.G	Timeline
9.H	Taxpayer Money
9.I	Costs Not Included in the SPEIS
10.0	Candidate Sites
10.A	Not Used
10.B	LANL
10.C	LLNL
10.D	NTS
10.E	TTR
10.F	Pantex
10.G	SNL/NM
10.H	SRS
10.I	Y-12
11.0	Requests for Additional Analysis
11.A	Additional Analysis - General
11.B	Nuclear Weapons Activities
11.C	Special Nuclear Material
11.D	Environmental Analysis
12.0	Kansas City Plant
13.0	Security Issues, Sabotage and Terrorism

Table 1.3-1—Issue Codes and Categories

Issue Code	Issue Category
13.A	Sabotage and Terrorism-General
13.B	Evaluation of Sabotage and Terrorism
13.C	Existing Security
13.D	Intentional Destructive Acts Appendix
13.E	Command and Control
14.0	Resources
14.A	Land Use
14.B	Not Used
14.C	Site Infrastructure
14.D	Air Quality
14.E	Water Resources
14.F	Geology and Soils
14.G	Biology
14.H	Cultural Resources
14.I	Socioeconomics
14.J	Environmental Justice
14.K	Health and Safety
14.L	Transportation
14.M	Waste Management
14.N	Facility Accidents
14.O	Cumulative Impacts
15.0	General Support Comments
15.A	General Support for Complex Transformation
16.0	General Opposition Comments
16.A	Opposition to Complex Transformation
16.B	Not Used
16.C	Opposition to Siting at LLNL
16.D	Not Used
16.E	Not Used
16.F	Not Used
16.G	Opposition to Siting at SNL
16.H	Opposition to Siting at Y-12
16.I	Not Used

Table 1.3-1—Issue Codes and Categories

Issue Code	Issue Category
16.J	Not Used
16.K	Not Used
16.L	Not Used
16.M	Not Used
16.N	Not Used
16.O	Not Used
16.P	Not Used
16.Q	Not Used
16.R	Opposition to Moving Flight Testing from TTR
17.0	Not Used
18.0	Staffing Reductions
18.A	Site Specific Staffing
18.B	General Comments on Personnel Impacts
18.C	Economic Concerns (Personnel)
18.D	Economic Issues ROI or Cost-Benefit Comments
18.E	Environmental Justice in Staff Reductions
19.0	Federal Oversight
19.A	Authorization Basis
19.B	Not Used
19.C	Not Used
19.D	Not Used
19.E	Seismic Protection of Proposed Facilities
20.0	Out-of-Scope

Table 1.3-2—Index of Attendees at Public Hearings

Public Hearing Attendees	
February 21, 2008 - North Augusta, SC - Afternoon Session	
Amalone, Patrick, Atlanta, GA	Karris, Kim, Atlanta, GA
Antonoplos, Barbara, Atlanta, GA	Keith, Susan, Decatur, GA
Baldwin, Elizabeth, Atlanta, GA	King, Joan, Sautee, GA
Ballew, Wende, Sander Springs, GA	Kushner, Adele, Alto, GA
Barnwell, Micah, Decatur, GA	Laney, Berta, Atlanta, GA
Born, Jan, Westbrook , ME	Lewis, Marcus
Brewer, Krista, Atlanta, GA	Lutenbacher, Rocio, Atlanta, GA
Bridgman, Jim	Mauter, Gudrun, Albuquerque, NM
Carroll, Glenn, Atlanta, GA	Miklethun, Betsey, Norcross, GA
Caswell, Helen, Cottage Grove, OR	Minerd, Leslie, Cola, SC

Table 1.3-2—Index of Attendees at Public Hearings

Public Hearing Attendees	
Cooper, Elaine, Columbia, SC	Mitchell, Michele, Asherville, NC
Dzung, (Unknown)	Nguyen, Hannah, Decatur, GA
Evans, Peter, Aiken, SC	Olson, Mary, Asheville, NC
Feig, Danny, Atlanta, GA	Patrie, Lewis
Ferguson, Tom	Paul, Bobbie, Atlanta, GA
Fleck, Martin, Washingon, DC	Phelps, Kris, Decatur, GA
Forster, Irv, Decorah, IA	Prince, Peggy
Foster, Nicholas, Atlanta, GA	Ramm, Hartmut, Kennesaw, GA
Garcia, Christian	Reilly, Molly, Atlanta, GA
Garrett, Holly, Clemson, SC	Reilly, Mary, Atlanta, GA
Gordon, Judy, Evans , GA	Richardson, Don, Brevard, NC
Gurr, Henry, Aiken, SC	Rudolph, Gerald, Columbia, SC
Gustin, Iza, Atlanta, GA	Russell IV, Fielding, Rabun Gap, GA
Hill, Amanda, East Point, GA	Sallywhite, Ronnie
Honicker, Jeannine, La Grange, GA	Spencer, Dane, Savannah, GA
Hughes, Anne, Decatur, GA	Stocker, Judith, Keysville, GA
Hughes, Charles, Jr. Decatur, GA	Tatum, Gloria, Decatur, GA
Hunnicutt, Ella	Uhrich, Jack
Jacobs, David, Asheville, NC	Valentin, Dianne, Atlanta, GA
Joye, Barbara	
February 21, 2008 - North Augusta, SC - Evening Session	
Arnold, Ed, Atlanta, GA	Jobe, H.R., Columbia, SC
Bobbitt, Nancy, Evans, GA	Lindsey, Hildy, Columbia, SC
Bussey, Eddie, Hephzibah, GA	Lindsey, John, Columbia, SC
Carroll, Glenn, Atlanta, GA	Rivard, Betsy, Atlanta, GA
Chaput, Ernie, Aiken, SC	Rogers, Harry, Columbia, SC
Clements, Tom, Columbia, SC	Wolfe, Clint, Aiken, SC
February 26, 2008 - Oak Ridge, TN - Afternoon Session	
Barakat, Yusif, Pinckney, MI	Kindfield, Peter, Summertown, TN
Barger, Elizabeth, Summertown, TN	Kindfield, Noah
Beehan, Thomas, Oak Ridge, TN	Kuykendall, Charlie, Knoxville, TN
Bergier, Kim, Madison Heights, MI	Larsen-Clark, Brita, Johnson City, TN
Beziat, Pamela, TN	Leaverton, David, Knoxville, TN
Bone, Gerald	Lenhard, Joe, Na, TN
Bowers, Terry	Lentsch, Mary
Bradshaw, Mike	Lester, James
Bradshaw, Gary, Powell, TN	Lugo, Chris, Nashville, TN
Breeden, G.A., Powell, TN	Marion, Bob
Broome, Gina	Markle, Judy, Grosse Point, MI
Brown, Dave	McClure, Gene
Bryan, Mary, Maynardville, TN	McNally, Jan
Carroll, Glenn	Melson, Jeff, Rockwood, TN
Chinn, Rick	Meyer, Karl, Nashville, TN
Clark, Don, Pleasant Hill, TN	Miller, Jane
Cox, Shirley	Morehead, Tupper, Norris, TN
Da Silva, Peggy, San Francisco, CA	Navarro-Valenti, Susana, Oak Ridge, TN
Dale, Sigrid	Nicholson, Amy, Hohenwald, TN
Duncan, Woody	O'Hara-Bruce, Sharon, Lake Orim, MI
Ewald, Linda	Osmand, Pam
Farmer, Mike, TN	Parko, Joseph, Crossville, TN
Felsing, Joann	Rundle, Bob

Table 1.3-2—Index of Attendees at Public Hearings

Public Hearing Attendees	
Felsing, Richard	Scarbrough, Paul
Fisher, Homer, Powell, TN	Short, Linda, Oak Ridge, TN
Green, Carol, Maryville, TN	Stark, Leonard, Pleasant Hill, TN
Griswold, Jonathan, Knoxville, TN	Stark, Betty, Pleasant Hill, TN
Hardy, Parker	Stark, Walter, Pleasant Hill, TN
Hickey, William	Twine, Michael, Oak Ridge, TN
Hutchison, Ralph	Van Der Harst, John, Nashville, TN
Irwin, Eva, Clinton, TN	Vineyard, Randy
Johnson, W.E., Rockwood, TN	Whalen, John, Harriman, TN
Jones, Steve, Knoxville, TN	Whitley, Gary, Oak Ridge, TN
Jones, Virginia, Oak Ridge, TN	Wingeier, Stephen
February 26, 2008 - Oak Ridge, TN - Evening Session	
Anonymous, Maryville, TN	Johnson, Libby
Bell, Glenn	Jones, Rex, Knoxville, TN
Box, Howard	Kreis, Evora
Bredesen, Phil	Mattson, Gail
Broome, Gina	McLaughlin Jr., Wayman, Oak Ridge, TN
Coker, Jason, Na, TN	McLeod, Emma
Collins, Cindy	McLeod, Lissa
Collins, Kevin	Mead, Steven, Oak Ridge, TN
Dunlap, Sandy, Maryville, TN	Mendola, Annette
Fields, Eric	Messerli, Doug, Knoxville, TN
Free, Rev. Marcia, Knoxville, TN	Quinn, Judy, Oak Ridge, TN
Green, Carol	Samuels, Charles, Oak Ridge, TN
Hennigan, Richard	Short, Jase
Hensley, Charlie	Sullivan, Judy
Horning, Douglas	Trew, Tom
Human, Gary, Knoxville, TN	Wascom, Shelley
February 28, 2008 - Amarillo, TX - Afternoon Session	
Allison, Pam, Amarillo, TX	Molino, Renzo, Glendale, MA
Belushi, Mavis, Panhandle, TX	Montgomery, Lorita
Burnam, Lon, Ft Worth, TX	Nordhausen, Ray, Amarillo, TX
Detten, Tonya, Panhandle, TX	Oliver, Bryan
Egan, Jean, Austin, TX	Pritchett, Steve, Amarillo, TX
Egan, Tom, Austin, TX	Relle, Sara, Clarendon, TX
Erben, Randy, Austin, TX	Rohloff, Greg, Amarillo, TX
Fields Johnson, Mina, Amarillo, TX	Roulston, Robert, Amarillo, TX
Finegold, Allen, Amarillo, TX	Simms, Jim, Amarillo, TX
Foster, Jennifer, Childress, TX	Smith, Doris, Panhandle, TX
Gordon, Susan, Santa Fe, NM	Stein, Cletus, Amarillo, TX
Harris, Bill, Amarillo, TX	Venable, Minnie, Amarillo, TX
Hinsley, Joyce, Amarillo, TX	Wilkerson, Brian
Kelley, Janette, Amarillo, TX	Williams, C.E., White Deer, TX
Kovac, Scott, Santa Fe, NM	Zenov, Becky, Amarillo, TX
Livingston, Dale, Amarillo, TX	
February 28, 2008 - Amarillo, TX - Evening Session	
Backus, Larry, Amarillo, TX	Hallett, Steve
Burnam, Lon	Hinsley, Joyce
Cole, Leslie, Amarillo, TX	Kovac, Scott
Dallett, Belinda, Amarillo, TX	Lerm, Ron, Amarillo, TX

Table 1.3-2—Index of Attendees at Public Hearings

Public Hearing Attendees	
Finegold, Allen	Stein, C., Amarillo, TX
Forrester, Cannoll, Anna, TX	Stephens, Nancy, Amarillo, TX
Gordon, Susan , Santa Fe, NM	Welch, Kevin
March 4, 2008 - Tonopah, NV - Evening Session	
Browser, Charles, Tonopah, NV	Perchetti, Ryan, Tonopah, NV
Eason, James, Tonopah, NV	Pruitt, Dirk, Carson City , NV
Eastley, Joni, Tonopah, NV	Pzyue, Terry, Tonopah, NV
Elliston, Jerry, Tonopah, NV	Ralph, Garcia, Tonopah, NV
Friel, Arlene, Tonopah, NV	Rini, James , N. Las Vegas, NV
Fuchsel, B., Tonopah, NV	Ripley, Sterling, Tonopah, NV
Galli, James, Tonopah, NV	Ripley, Judith, Tonopah, NV
Goebel, Bill, Tonopah, NM	Ripple, Trish, Tonopah, NV
Goebel, Rachelle, Tonopah, NV	Scarine, Richard, Las Vegas, NV
Gray, Trish, Tonopah, NV	Sherwood, Bob, Las Vegas, NV
Kaminsky , Don, Tonopah, NV	Skobel, Mark, Las Vegas, NV
Kaminski, Cindy, Tonopah, NV	Smith, Roger, Meadview, AZ
Krestchmer, Lynn, Tonopah, NV	Snyder, Karmin, Las Vegas, NV
Kretschmer, Ray, Tonopah, NV	Sperry, Ben, Tonopah, NV
Littlefield, Gene, Tonopah, NV	Steanman, Mike, Las Vegas, NV
Marlow, Rolly, Tonopah, NV	Stillnell, Keith, Tonopah, NV
Maslach, Joe	Stillwell, Kelly
Matta, Carmew, Tonopah, NV	Stohenberg, Jennie, Tonopah, NV
McLauchlin, Jay, Tonopah, NV	Theodore, Steve, Henderson, NV
Miller, Joseph, Boulder City, NV	Toany, Ed
Misita, David, Eglin Air Force Base, FL	Trowbridge, James, Tonopah, NV
Ohrt, Steve, Albuquerque, NM	Weaver, Bob, N. Las Vegas, NV
Otteson, Carrie, Tonopah, NV	Wells, Larry, Tonopah, NV
Otteson, Danny, Tonopah, NV	Zane, Jon, Tonopah, NV
Pearson, Ronald, Tonopah, NV	
March 6, 2008 - Las Vegas, NV - Afternoon Session	
Amidon, John	Ross, Candace, Indian Springs, NV
Bautista, Cara, Berkeley, CA	Sabatini, Sean, Las Vegas, NV
Crawford, Teresa, Henderson, NV	Shafer, David, Las Vegas, NV
Dakin, Walter, Mercury, NV	Swartz, Ginger, Las Vegas, NV
Ediger, Peter	Welsh, Myron and Anne, Las Vegas, NV
Goldstein, Steven, Las Vegas, NV	Wesley, Jr., Robert , Las Vegas, NV
Gutierrez, Juan	Zabarte, Ian, Cactus Springs, NV
Kostoff, Karen, Henderson, NV	Zawada, Jerome, Las Vegas, NV
Morton, Jenna, Las Vegas, NV	
March 6, 2008 - Las Vegas, NV - Evening Session	
Anzalone, Gloria Day, Las Vegas, NV	Perna, Frank, Las Vegas, NV
Bartholomae, Lyla	Rake, Launce, Las Vegas, NV
Buchter, Jennifer, Henderson, NV	Ray, Robin, Las Vegas, NV
Eastley, Joni, Tonopah, NV	Rice, Megan, Las Vegas, NV
Enyeart, Sandy, Las Vegas, NV	Robert, Alexandria
Feldman, Jane, Las Vegas, NV	Shauls, Dahn, Las Vegas, NV
Felske, Don, Mercury, NV	Spychala, Michael, Henderson, NV
Hiatt, John, Las Vegas, NV	Thomasson, Catherine
Leskys, Al	Vitale, OFM, Louis, Las Vegas, NV

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Public Hearing Attendees	
March 10, 2008 - Socorro, NM - Evening Session	
Beason, Doug, Los Alamos, NM	Martz, Joe, Los Alamos, NM
Bush, Matt, Socorro, NM	Mello, Greg, Albuquerque, NM
Garrity, Tom, Albuquerque, NM	Post, Thomas, Albuquerque, NM
Gordon, Susan, Santa Fe, NM	Romero, Van, Socorro, NM
Grayeda, Marco, Las Cruces, NM	Stanley, Mike, Socorro, NM
Guanlao, no first name provided, Socorro, NM	Steinhoff, Edie, Socorro, NM
Guardian, Julian, Albuquerque, NM	Stillion, Kay, Mountainair, NM
Guengench, Colleen, Socorro, NM	Wallace, Terry
Harrington, Steve	Walsh, Dan, Socorro, NM
Kovac, Scott, Santa Fe, NM	Wical, Stephanie, Socorro, NM
Martinez, Pat, Los Lunas, NM	Williams-Mello, Trish, Albuquerque, NM
March 11, 2008 - Albuquerque, NM - Afternoon Session	
Amato, Geraldine	Lambert, George, Albuquerque, NM
Amstutz, Anita, Albuquerque, NM	Mello, Greg
Archuleta, Julie, Albuquerque, NM	Mickelson, R.W., Albuquerque, NM
Barrett, Floy	Mitchell, Marty, Albuquerque, NM
Beason, Doug, Los Alamos, NM	Moonka, Ajoy, Albuquerque, NM
Bess, Claudia	Nakigan, Mary, Albuquerque, NM
Bierley, Denise, Sandia Park, NM	Neils, Peter
Brown, Joan, Albuquerque, NM	Obeushain, Virginia
Bucklin, Susie, Albuquerque, NM	Ofte, Donald, Albuquerque, NM
Bunting, Dorie	Otto, Lilly, Albuquerque, NM
Burgess, Justin, Albuquerque, NM	Padilla, Vic, Albuquerque, NM
Cenamcic, Carol, Albuquerque, NM	Peuotte, Mailene, Albuquerque, NM
Chavez, Sue	Powell, Charles, Albuquerque, NM
Clark, David, Los Alamos, NM	Press, Robert, Albuquerque, NM
Cobb, Sarah , Rio Rancho, NM	Raimer, Ellen, Albuquerque, NM
Collonge, Chylsea, Albuquerque, NM	Rauch, Frances, Albuquerque, NM
Corry, Betty, Albuquerque, NM	Robinson, Ellen, Albuquerque, NM
Corry, Julie	Rodriguez, Susan, Albuquerque, NM
Cromer, Guy, Albuquerque, NM	Rudd, Mark, Albuquerque, NM
Davis, Kim, Albuquerque, NM	Ryan, Bud, Cedar Crest, NM
Detweiler, Donna, Albuquerque, NM	Santelli, Maria, Albuquerque, NM
Duran, Geraldine, Albuguerque, NM	Scimonelli, Rosalie
Eichhorn, Paul, Albuquerque, NM	Seal, Mary, Albuquerque, NM
Evans, Rosamand, Albuquerque, NM	Shaw, Rose, Rio Rancho, NM
Evans, Janice, Albuquerque, NM	Smith, Betty, Albuquerque, NM
Fisher, Kim, Albuquerque, NM	Stone, Kate, Albuquerque, NM
Gallegon, Kim, Albuquerque, NM	Surbey, Bobbie
Gandara, Cera, Rio Rancho, NM	Thompson, Sally Alice, Albuquerque, NM
Good, Marlin	Vorenberg, Sue, Santa Fe, NM
Greathorese, Bonnie, Albuquerque, NM	Waltons, Pam, Albuquerque, NM
Greehe, Jerry , Albuquerque, NM	Weakee, Sonny
Gross, Sharon	Webster, Astrid, Albuquerque, NM
Gross, Bill, Albuquerque, NM	West, John, Albuquerque, NM
Gutierrez, Donald, Albuquerque, NM	Wexler, Joseph, Albuquerque, NM
Hand, Denise	Willams, Vern, Sandia Park, NM
Hilton, Clint, Albuquerque, NM	Williams, Marjorie, Albuquerque, NM
Hodges, Ann	Wilson, Herry, Albuquerque, NM
Kidd, Judith, Albuquerque, NM	Wolff, Ted, Albuquerque, NM

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Public Hearing Attendees	
March 11, 2008 - Albuquerque, NM - Evening Session	
Adams, Hildegard, Albuquerque, NM	Kerlinsky, Daniel
Anatasio, Michael	Lambert, George
Anonymous	Mara, Glenn
Baek, Joanne, Arroyo Hondo, NM	Martinez, Johnnie
Bean, Kevin, Carnuel, NM	McCoy, Dave
Beems, William	McGrath, Jim, Edgewood, NM
Blankenship, Tiska, Albuquerque, NM	Mello, Greg, Albuquerque, NM
Burrus, Nell	Neymonk, Shel, Embudo, NM
Cobb, Sarah, Rio Rancho, NM	Nicholas, Louis, Albuquerque, NM
Cornelius, Bob, Tatum, NM	Ong, Kim, Albuquerque, NM
Doppke, Mark, Albuquerque, NM	Orlandini, Maria, Albuquerque, NM
Eichhorn, Paule	Petuagla, Jeff, Albuquerque, NM
Erdman, Daniel, Albuquerque, NM	Price, Elisabeth, Albuquerque, NM
Evans, Janice	Probrowski, Jamima, Albuquerque, NM
Fluegge, Claudia	Schrader, Don, Albuquerque, NM
Garrity, Tom, Albuquerque, NM	Seay, Diane, Albuquerque, NM
Green, Connie, Albuquerque, NM	Sensing, Anne, Albuquerque, NM
Greenwald, Janet	Story, Rhead, Albuquerque, NM
Gutierrez, Rebecca	Thomas, George, Rio Rancho, NM
Harrison, Ann, Albuquerque, NM	Thompson, Sally-Alice
Harrison, Richard, Albuquerque, NM	Vigil-Giron, Rebecca, Albuquerque, NM
Hasking, Chuck, Albuquerque, NM	Webster, Astrid, Albuquerque, NM
Hostetter, Richard	Woodard, Joan
Jcou, Laoak	Zigler, Suzanne, Albuquerque, NM
March 12, 2008 - Los Alamos, NM - Evening Session	
Anastasio, Mike	Koop, Myron, Los Alamos, NM
Balog, John, Los Alamos, NM	Korzekws, Deniece, Los Alamos, NM
Barras, Jeannette, Los Alamos, NM	Leoasure, Craig, Los Alamos, NM
Basile, Dennis, Los Alamos, NM	Lyon, Kendra, Santa Fe, NM
Beaumont, Holly, Santa Fe, NM	Majors, Linda, Los Alamos, NM
Benson, Jody, Los Alamos, NM	Mansfold, Charles, Los Alamos, NM
Bernstein, Lee, Los Alamos, NM	Mara, Glenn
Berting, Frances, Los Alamos, NM	Martinez, Johnnie, Los Alamos, NM
Bishop, Alan, Los Alamos, NM	Matschlechez, JP, Los Alamos, NM
Bogart, Joan, Albuquerque, NM	Mello, Greg
Clark, David, Los Alamos, NM	Milder, Ken, Los Alamos, NM
Conradson, Steven, Los Alamos, NM	Morgan, Arthur, Los Alamos, NM
Corpion, Juan, Los Alamos, NM	Munson, Charles, Los Alamos, NM
Cowan, Troy, Alb, NM	Munson, Carter, Los Alamos, NM
Davis, Bart, Los Alamos, NM	Nev, Mary
Delamater, N, Los Alamos, NM	Newton, Carl, Los Alamos, NM
Dempsey, Mike, Los Alamos, NM	Overbay, Darryl, Los Alamos, NM
Dirlam, Gordon, Monument , CO	Page, Cedric , Los Alamos, NM
Dirlam, Cary, Monument, CO	Pedicini, John, Los Alamos, NM
Dirosa, Michael, Los Alamos, NM	Perello, Valerie, Surfside Beach, SC
Dreicer, Jared, Los Alamos, NM	Pop-Simil, Liviu
Dunham, Rob, Los Alamos, NM	Porterfield, Doniren, Los Alamos, NM
Dyke, James, Santa Fe, NM	Roberts, Barry
Eklund, John, Los Alamos, NM	Rodriguez, Veronica, Los Alamos, NM
Ellington, Newby, Los Alamos, NM	Rofer, Cheryl, Santa Fe , NM

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Public Hearing Attendees	
Ethridge, Jerry, Los Alamos, NM	Rosen, Louis, Los Alamos, NM
Foster, Dave, Los Alamos, NM	Ruttea, Carole, Los Alamos, NM
Freer, J.A, Los Alamos, NM	Saudon, Rayan
Fuehne, Dave, Los Alamos, NM	Scenielle, Rosalei
Gibson, Robert, Los Alamos, NM	Seestron, Susan, Los Alamos, NM
Giesler, Gregg, Los Alamos, NM	Shalles, Sieg, Los Alamos, NM
Gordon, Susan, Santa Fe, NM	Snodnon, Roger, Los Alamos, NM
Granzow, Kim, White Rock, NM	Starke, Tom, Santa Fe, NM
Grawzow, Howard	Stoddard, Stephen, Los Alamos, NM
Gritzo, Ludwig, Los Alamos, NM	Stratton, William, Los Alamos, NM
Grothus, Edward, Los Alamos, NM	Teter, David, Los Alamos, NM
Hall, Donald	Torozan, Dave, Omana, NM
Hall, James	Trapp, Tj, Los Alamos, NM
Handon, Earle, Los Alamos, NM	Ventura, Jon
Heinrichs, Todd, Los Alamos, NM	Wallace, Jeannette, Los Alamos, NM
Hockaday, Mary	Webster, Astrid, Albuquerque, NM
Idar, Deanne	Wheeler, Regina, Los Alamos, NM
Jarvinen, Laura, White Rock, NM	White, Bruce, Boulder, CO
Johnson, Debra, Los Alamos, NM	White, Paul, Los Alamos, NM
Judd, Dean, Los Alamos, NM	Windhell, Don, Espanola, NM
Kelley, Asa	Witt, Paul, Los Alamos, NM
Killeen, Jak	Wright, Cornell, Los Alamos, NM
Kniss, Brett, Los Alamos, NM	Wroblesla, Debra, Los Alamos, NM
March 13, 2008 - Los Alamos, NM - Afternoon Session	
Aghew, Lewis, Los Alamos, NM	Milen, Marcia
Arends, Joni, Santa Fe, NM	Mother, Anthony, Los Alamos, NM
Arinjo, Jimmy, Albuquerque, NM	Newton, Carl
Baek, Joanne, Arroyo Hando, NM	Nigengard, Jennifer
Baer, B Jo, Los Alamos, NM	Oliver, W.B, Los Alamos, NM
Beaumont, Holly, Santa Fe, NM	Padillo, Richard, San Juan Pueblo, NM
Boom, David, Santa Fe, NM	Pava, Dan, Los Alamos, NM
Burns, Carol, Los Alamos, NM	Plean, Bermard, Los Alamos, NM
Burns, Michael, Los Alamos, NM	Popa-Simil, Liviu, Los Alamos, NM
Clark, David	Powers, Peggy, Santa Fe, NM
Converse, Karen, Albuquerque, NM	Primak, Stan, Los Alamos, NM
Czuchcewski, Steve, Los Alamos, NM	Rich, Jeffrey
Erickson, Dennis, Los Alamos, NM	Rodrigez, Veronica
Fahringer, Alan, San Juan Pueblo, NM	Rose, Donald, Los Alamos, NM
Glover, Glen, Los Alamos, NM	Schulte, Louis, Los Alamos, NM
Gibson, Robert	Scimonelli, Rosalie
Gustafson, Scott, Los Alamos, NM	Seay, Glenn, Los Alamos, NM
Hailey, Shawn, Los Alamos, NM	Snidyer, Ron
Hanson, Eali	Solitt, Shannyn
Havdison, Cember	Stephenson, David , Cerrillos, NM
Henning, Kendra, Los Alamos, NM	Thomson, David, Los Alamos, NM
Isaacson, John, Los Alamos, NM	Torney, David, Jemez Springs, NM
Jacquez-Ortiz, Michele	Varley, Daniel, Los Alamos, NM
Jurecand, Omar	Ventura, Jon
Kane, Suzy, El Prado, NM	Vorenberg, Sue, Santa Fe , NM
Kerlinsky, Dan	Wallace, Jeannett, Los Alamos, NM
Kuerschner, Erik , El Prado, NM	Weiss, Don, San Juan Pueblo, NM
Kuhn, Betty, Santa Fe, NM	Wheeler, Regina

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Public Hearing Attendees	
Maggiore, Pete, Los Alamos, NM	Wilbanks, Jessica, Taos, NM
Majerus, Janet, El Prado, NM	Windiell, Don, El Panoca, NM
Mallory, Mike	Witt, Paul, Santa Fe, NM
Mamule, Chris, Los Alamos, NM	Wong, Raam
Martinez, Johnnie	Wright, Marjorie
Mehrvarz, Farkhondeh	Zamora, Gloria, Santa Fe, NM
Meidinger, Alfred, Los Alamos, NM	
March 13, 2008 - Santa Fe, NM - Evening Session	
Agoen, Barbara	Logan, Priscilla, Santa Fe, NM
Allen, Rosemary, Santa Fe, NM	Lokunaga, Jane, Santa Fe, NM
Allen, Carol, Albuquerque, NM	Louato, Anhara, Tesuque, NM
Alpert, Burt, Santa Fe, NM	Lovato, Ramoe, Santa Fe, NM
Arends, Joni, Santa Fe, NM	Ludzia, Tom, Santa Fe, NM
Asakelley, Amkelley, Los Alamos, NM	Lujan, Santana
Avilies, Cuauhtemo, Santa Fe, NM	Lustig, Jan, Santa Fe, NM
Bachmeler, Craig, Santa Fe, NM	Lyon, K, Santa Fe, NM
Bacon, David	Madeen, Gwen
Baron, Paula, Santa Fe, NM	Mahuberl, Nathaniel
Beaumont, Holly, Santa Fe, NM	Mallory, Mike
Beavais, Philippine, Tesugue, NM	Mandel, Robbie, Santa Fa, NM
Bernstein, Robert, Santa Fe, NM	Marachlian, Mariana, Santa Fe, NM
Besold, Bobbe	Mark, Kathryn
Birnbaum, Jeffrey, Santa Fe, NM	Martz, Joe
Bittel, Evelyn	Mayes, Susan, Santa Fe, NM
Blane, Brenda	Mazeand, Dominique, Santa Fe, NM
Blien, Tess, Santa Fe, NM	Mcarthur , Diana, Santa Fe, NM
Bliven, Rachel, Santa Fe, NM	Mcconnell, Aune, Santa Fe, NM
Blume, Brenda, Santa Fe, NM	McGinn, Pat, Santa Fe, NM
Boldt, Deborah, Espanola, NM	McMillan, Charlie
Boronyj, Anna, Santa Fe, NM	McMullen, Penelope, Santa Fe, NM
Bouelead, D.	Meeler, Jeanne, Ojo Sarco, NM
Brady, Holly	Mello, Greg
Brown, Richard, Santa Fe, NM	Miller, Matt, Santa Fe, NM
Brven, Gordon, Santa Fe, NM	Miller, Richard, Santa Fe, NM
Bulknap, Bianca, Santa Fe, NM	Miller, Virginia, Santa Fe, NM
Burckle, Ed	Miller, Virginia, Santa Fe, NM
Burehle, Susan, Santa Fe, NM	Mishegard, Jennifer, Los Alamos, NM
Burns, Sheila	Mitchell, Brad, Santa Fe, NM
Calderon, Mevika	Monpuez, Rich
Calvin, Sally, Santa Fe, NM	Montano, Catherine
Chase, James, Santa Fe, NM	Moonfrog, Lola, Santa Fe, NM
Chousen, Anna	Morris, Valarie, Santa Fe, NM
Christison, Willam, Santa Fe, NM	Munayaena, Takehiko
Clark, David	Nells, Peter
Clarke, Laura, Santa Fe, NM	Norris, Emry, Santa Fe, NM
Clarke, Michael, Santa Fe, NM	O'Connor, B, Santa Fe, NM
Coghlan, Jay, Santa Fe, NM	Oliaro, Joseph, Santa Fe, NM
Collins, Michael, Santa Fe, NM	Olson, Justin
Conroy, Barbara, Santa Fe, NM	Pacheca, Carlos
Cooper, Kate, Santa Fe, NM	Pachen, Manuel
D'Lendrea, Pat	Paisner, Jeffery
Dean, Dorothy , Santa Fe, NM	Perea, Jacob, Santa Fe, NM

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Public Hearing Attendees	
Doughty, Alyiah, Santa Fe, NM	Pherpont, Jon
Doyle, Kevin, Santa Fe, NM	Phillips, Chrysava, Santa Fe , NM
Dulfer, Stephen, Santa Fe, NM	Piburn, Giselle
Dunn, Paul	Pleau, Bernard, Los Alamos, NM
Elrick, Krista	Porter, Steven, Santa Fe, NM
Emeiso, Jessie	Potter, Sharon, Santa Fe, NM
Ericson, Erie, Santa Fe, NM	Prince, Peggy, Santa Fe, NM
Evaskovich, Andrew, Fairview, NM	Priole, Kathy
Fe, Avree	Procter, Rebecca
Fong, Stephen, Los Alamos, NM	Pyle, Sasha, Santa Fe, NM
Frenkel, Jack, Santa Fe, NM	Quintana, Louisa
G., Marilyn, El Prado, NM	Radagnanz, Larry, Santa Fe, NM
Gallaghen, Pat, Santa Fe, NM	Rail, George
Gallegos, Tom	Robinson, Garrett
Galler, Tom, Santa Fe, NM	Rofer, Cheryl, Santa Fe, NM
Gent, Clise , Santa Fe, NM	Ryan, Bud
Gilbert, Edgar	Savain, T, Las Vegas, NM
Gilclirist , Paula, Santa Fe, NM	Schiff, James, Santa Fe, NM
Girardi, Nona	Scolten, Kent, Santa Fe, NM
Glasco, Tim	Seguin, Nicole
Godshal, Katria	Shalev, Lorenna, Santa Fe, NM
Gold, David , Santa Fe, NM	Shepherd, Holland, Santa Fe, NM
Goldstine, Phil, Santa Fe, NM	Simmons, Rose
Gollub, Bruce	Sindiler, Allan, Cerrillos, NM
Gonzales, John	Skinner, Elliott, Santa Fe, NM
Goodluck-Barnes, Shea, Santa Fe, NM	Sollitt, Shannon
Gordon, Susan	Sperlich, Betty, Santa Fe, NM
Green, Jeanne	Steffy, Susan, Santa Fe, NM
Green, Joan, Taos, NM	Sterhe, Tom
Griego, Juan, Los Almos, NM	Storbeck, Audrey, Santa Fe, NM
Hall, Jim, Los Alamos, NM	Stpiene, Elana
Harris, Elizabeth, Santa Fe, NM	Swdgrass, Roger
Harris, Ned	Tenondo, Georgia, Las Vegas, NM
Harris, Angela, Sante Fe, NM	Terry, Nicole
Henkils, Margret	Torres, Roberto
Hernandez-Hddoh, Katia, Santa Fe, NM	Trollinger, Everett
Hibbs, Linda, Santa Fe, NM	Venkatesh, S
Hiranco, Pierre, Santa Fe, NM	Vergora, Sylvia, Dixon, NM
Holloway, Colin, Santa Fe, NM	Volteslas, Eleanoie, Santa Fe, NM
Holmes, Rick	W., Pat
Homens, Helenty	Wang, Larry, Santa Fe, NM
Isaack, John	Webster, Astrid
Johnson, Richard, Santa Fe, NM	Wheeler, Jeanne
Johnston, Mariaun, Santa Fe, NM	Wildharber, Tony, Santa Fe, NM
Jones, Andra, Santa Fe, NM	Williams, Moriah, Santa Fe, NM
Keeler, Josh, Santa Fe, NM	Williams, V.
Keightley, Dorothy, Montezuina, NM	Wilson, Margneinto
Kenney, Nancy, Santa Fe, NM	Winchell, Don, Los Alamos, NM
Knight, Susie, Santa Fe, NM	Wingren, Paul
Korpi, Khira, Santa Fe, NM	Withon, John, Santa Fe, NM
Kovac, Scott	Witt, Paul, Santa Fe, NM
Kuerschner, Erich, El Prado, NM	Woods, Rachelle

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Lama, Karma, Santa Fe, NM	Wylie, K., Santa Fe, NM
Leke, Bushrod, Santa Fe, NM	Yozell-Epstein, Nina, Santa Fe, NM
Lewis, Beatrice	Zamora, Gloria, Santa Fe, NM
Lindberg, Francine, El Prado, NM	
March 18, 2008 - Tracy, CA - Evening Session	
Anderson, Carl, Oakland, CA	Keen, Randolph, Stockton, CA
Bott, Patti, Santa Fe, NM	Kelley, Marylia
Cabasso, Jackie, Oakland, CA	King, Beverly
Cassidy, Larry, Mantcha, CA	Logan, Roger, Livermore, CA
Chase, Dawn, Livermore, CA	Lopez, Larry, Discovery, CA
De Groot, Ria	Lyle, Terry, Modesh, CA
Doan, Bien, Tracy, CA	Mcisaac, Ewall, Pt. Reyes Station, CA
Edwards, David, Tracy, CA	Morearty, John, Stocktoa, CA
Edwards, Barbara, Tracy, CA	Perkins, Tina, Tracy, CA
Enberg, Catherine, Woodland, CA	Petersen, Jeff, Antioch, CA
Ewing, Aaron, Tracy, CA	Pullin, K. Leo, Tracy, CA
Ferry, Leslie, Livermore, CA	Sarvey, Bob
Folks, Karen, Castro Valley, CA	Schwartz, Robert
Gallagher, Patrick, Tracy, CA	Scott, John
Grakam, Keith, Vallejo, CA	Spearow, Jimmy, Davis, CA
Green, Rex, Fremont, CA	Wang, Harry, Sacramento, CA
Groot, Ria, Stockton, CA	Williams, Wade, Livermore, CA
Jones, Jim, Tracy, CA	
March 19, 2008 - Livermore, CA - Evening Session	
Anderson, Carl, Oakland, CA	Meier, Charles, Pleasanton, CA
Barshir, Maytal	Miles, Loulena, Berkley, CA
Benteron, David, Santa Barbra, CA	Miller, George
Bosche, Lynne, Piedmont , CA	Morearty, John, Stockton, CA
Brough, Winslow, Livermore, CA	Morphopoucos, Hercules, Kensington, CA
Brown, Anne, Walnut Creek, CA	Murray, Kathryn, Santa Barbara , CA
Buckley, Ryan, Pleasanton, CA	Nioae, Patrica, Livermore, CA
Butler, Rick, Oakland, CA	O'Brien, Hank
Cabasso, Jackie	Olin, Phyllis
Campbell, Steve	Pels, Jacquelin, Walnut Creek, CA
Devries, Jedidyah	Pinkard, Ml, Lafayette, CA
Enberg, Catherine, Woodland, CA	Preda, Daniel, Berkeley, CA
Fulk, M, Livermore, CA	Rayan, Linda, Livermore, CA
Genet, Joanne, Lafayette, CA	Rechard, Pamela
Geschwind, Michael, San Francisco, CA	Richard, Pam, Dublin, CA
Gleason, Ken	Ruepple, Duane, Livermore, CA
Goodpasture, Stella, Oakland, CA	Seitz, Ann, Hayward, CA
Gordon, Duane, Livermore, CA	Shirley, John
Gorrie, Kyle, Livermore, CA	Silvia, Oakland, CA
Hanson, Robert, Walnut Creek, CA	Singer, Anne, Walnut Creek, CA
Hart, Mark, Livermore, CA	Stanley, David, Walnut Creek, CA
Hoon, Daryl, Livermore, CA	Stormoen, Steve, Santa Barbara, CA
Hosokawa, Kohji	Swyers, Matthew
Hume, Corinne, Rescue, CA	Terusaki, Stan, Livermore, CA
Kelley, Marylia	Terusaki, Beryl, Livermore, CA
Kimber, John, Livermore, CA	Turner, Janis, Livermore, CA
King, Beverly	Turner, Janice-Kate

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Landrum, Alan, Livermore, CA	Valencia, Jesus, Livermore, CA
Leeper, Steve	Veiluva, Michael, Walnut Creek, CA
Logan, Roger	Vitale, Louis, Oakland, CA
Logan, Roger	Willis, Alex, Livermore, CA
Loyole, Daniel, Livermore, CA	
Mcisaac, Ewall, Pt. Reyes Station, CA	
March 20, 2008 - Livermore, CA - Afternoon Session	
Abraham, Leah, Berkeley, CA	Knight, Dan, Livermore, CA
Adams, Phillip, Oakland, CA	Larkin, Don, Santa Cruz, CA
Arnat, Consuelo, Berkeley, CA	Legino, Allison, Novato , CA
Ault, Jahsiah	Leider, Marj
Baizas, Pamela, Livermore, CA	Logan, Roger, Livermore, CA
Bautista, Cara, Berkeley, CA	Mcneil, Stephen, San Francisco, CA
Bazan, Jeanne, Pleasanton, CA	Milaison, Kelly
Binkley, Thad, Pleasanton, CA	Miller, George
Bockstiegel, Melanie, Fremont, CA	Moonka, Ajoy
Boddum, Annie, Oakland, CA	Moore, Liz, Berkeley, CA
Brink, Toby, Pleasanton, CA	Neal, Louise
Brown, Betty, Kensington, CA	Nemo, William
Brown, Mike, Livermore, CA	Nesbitt, Dale, Berkeley, CA
Cabasso, Jackie	Nilser, Curt, Livermore, CA
Carpenter, Wesley, Berkeley, CA	Nisslay, Donald
Carroll, David, Berkeley, CA	Oldfather, John
Chamberlin, Liz	Olin, Phyllis, Berkeley, CA
Clark, Edward	Palsgrove, Gene, Modesto, CA
Couture, Jacques, Lafayette, CA	Perry, Rita
Devries, Jedidiyah, Livermore, CA	Quinly, Crystal
Dorabji, Tara	Ruyle, Eugene, Oakland, CA
Dow, Jerry, Pleasanton, CA	Santina, Laura, Oakland, CA
Edwin, Marjorie, Santa Cruz, CA	Sarabia, Michael, Bay Point, CA
Elizondo, Daniela, Berkeley, CA	Sblendurio, Sblend
Even, William, Livermore, CA	See, Eric, Oakland, CA
Farnworth, Richard	Sekai, Robert, Oakland, CA
Foster, Eleanor, Santa Cruz, CA	Setian, Kathy, San Francisco, CA
Foster, Herb	Shipley, Nikki, Discovery Bay, CA
Fowler, Same, Berkeley, CA	Silvey, Deborah, Berkeley, CA
Freeman, Maria, Santa Cruz, CA	Silvey, Robert, Berkeley, CA
Garberson, Jeff, Livermore, CA	Smith, Mark, Oakland, CA
Griffin, Rebecca, Berkeley, CA	Swiss, Stephen
Haggarty, Patrick, Oakland, CA	Swyers, Matthew
Harwood, Jan, Santa Cruz, CA	Tal, Rony, Berkeley, CA
Hatami, Haleh, San Francisco, CA	Tamo, Gene, Modesto, CA
Hidrobo, Laura, Arcata, CA	Taylor, John, Oakland, CA
Homert, Paul	Thomas, Aaron, Berkeley, CA
Horn, Alan, Sebastopol, CA	Tumm, Maureen, Livermore, CA
Jardine, Phyllis, Pleasanton, CA	Voth, Dan, El Cerrito, CA
Joryensen, Andrew, Livermore, CA	Walt, Michael, Oakland, CA
Kakimeto, Dorothy, Alameda, CA	Wiedemann, Sandee
Kelley, Marylia	Williams, Jeff
Kidder, Ray, Pleasanton, CA	Willis, Alec, Livermore, CA
King, Donald, Livermore, CA	Wills, Matt
King, Burnny, Livermore, CA	Wilson, Patricia, Kensington, CA

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Klotz-Chamberlin, Peter	
March 25, 2008 - Washington, DC - Afternoon session	
Abott, Richard, Washington, DC	Kimura, Taijiro, Washington, DC
Anton, Patricia, Washington, DC	Lacy, Darrell, Pahrump, NV
Baldwin, Tammy	Lucey, Marie, Silver Spring, MD
Barfield, Ellen, Baltimore, MD	Lundgren, Dwight, Valley Forge, PA
Becker, Elliott, Washington, DC	Mara, Glenn
Blanchard, Rosemary Ann, Albuquerque, NM	Meyer, Alfred, Washington , DC
Breisler, Jodi, Washington, DC	Moffat, Pamela
Brewer, Krista, Atlanta, GA	Mohling, Judith, Boulder, CO
Cernansky, Christine, Washington, DC	Morrow, Tara, Washington, DC
Chatterjee, Rhitu, Washington, DC	Nangle, Joseph, Washington, DC
Cully, James, Washington, DC	Nanther, Richard, College Park, MD
Culp, David, Washington, DC	Nelson, Robert, Washington, DC
Davis, Molly, Arlington, VA	Northler, Richard, College Park, MD
Davis, Molly, Washington, DC	O'Connell, Timothy, Drenel Hill, PA
Eastley, Joni	Paine, Christopher, Washington, DC
Eisler, Peter, Washington, DC	Peterson, Laura, Washington, DC
Ferger, Kathryn, Washington, DC	Rainwater, Jon, Oakland, CA
Fine, Todd, Washington, DC	Reed, Alex, Washington, DC
Fleck, Martin, Washington, DC	Roth, Nick, Washington, DC
Fuchs, Katherine, Silver Spring, MD	Sands, Derric, Washington, DC
Garger, Kathy, Ellicott City, MD	Schaeffer, Robert, Sanibel, FL
Godsberg, Alicia, Washington, DC	Shihy, John, Livermore, CA
Gordon, Susan, Santa Fe, NM	Spees, Richard, Washington, DC
Gubrud, Mark	Steinke, Jim, Newport News , VA
Gusterson, Hugh, Washington, DC	Thomas, Ellen, Washington, DC
Gustus, Hugh, Washington, DC	Ventura, John
Hartang, William, New York, NY	Virji, Anisa, Washington, DC
Helfrich, Devin, Washington, DC	Wertz, Cheryl, New York, NY
Hitow, Rachel, Washington, DC	Wilbawis, Jessica
Jacobson, Todd, Washington , DC	Williams, Paul, Washington, DC
Kamps, Kevin, Takoma Park, MD	Young, Stephen, Washington, DC
Karger, Cathy, Ellicottt City, MD	Zaebst, Serenity
Kelly, Cindy, Washington, DC	Zaebst, Emily
Kessler, Frederick, Madison, WI	
March 27, 2008 - Espanola, NM - Evening Session	
Acby, Violette	Lawyer, Lluia
Albg, Violette, Ojo Sauco, NM	Leuenssey, Tanya, Llano, NM
Archulita, Cheryl , Penasco, NM	Lindsay, Roxanne, Livermore, CA
Arends, Joni, Santa Fe, NM	Logghe, Joan, Espanola, NM
Armstrong, Kelly, Espanola, NM	Logghe, Mike, Espanola, NM
Baek, Joanne, Arroyohendo, NM	Lopez, Michael, Santa Fe, NM
Beaumont, Holly, Santa Fe, NM	Lopez, Larrie, Santa Fe, NM
Beesley, Ken, Espanola, NM	Lujan, Cecilia, Fairview, NM
Berger, Jeff	Lyman, Jeanette, Arlington, VA
Binnecus, Bonnie, El Pardo, NM	Macdonald, Mary, Heinandez, NM
Bird, Nathana, Santa Cruz, NM	Maestas, Gerald, Espanola, NM
Bishop, Alan, Los Alamos, NM	Malone, Molly
Bolton, Billie	Martinez, Johnnie, Velarde, NM
Buechley, Nancy, El Valle, NM	Martiz , Eddin

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Buechley, Larry, Chamisal, NM	Mascarenas, Mary, Los Alamos, NM
Burges, Margaret, Espanola, NM	Mathews, Kay, Chaminal, NM
Burns, Michael, Los Alamos, NM	Miller, Larry, Ojo Sarcio, NM
Caminiti, Rose, Llano, NM	Miller, Carol, Ojo Sarco, NM
Chatfield, Nancy, Espanola, NM	Morrison, Alva, Dixon , NM
Chez, Bob, Oke Owingeh, NM	Narhnjo, Marian, Espanola, NM
Chilton, Maria, Dixon, NM	Neynanle, Shel, Espanola, NM
Ciddeio, Ursula	Ng, Loneuz
Ciddeio, Joseph, Dixon, NM	Nichols, Jean
Clark, David, Los Alamos, NM	Nieman, Whitney, El Prado, NM
Comenan, Sheena, Embudo, NM	Noel, Sue, Espanola, NM
Cook, Richard, Espanola, NM	Nussbaum, Greg, Santa Cruz, NM
Cooper, Edgar, Embudo, NM	Olatr, Adhaa, Espanola, NM
Davies, Penny	Onlara, Yvonne, Espanola, NM
Deschweintz, Clark, Santa Cruz, NM	Padilla, Pete, Espanola, NM
Desegovia, Mauricio	Palna, Catherina, Ojo Caliente, NM
Duran, Clarissa	Pantano, Patricia, Sta Cruz, NM
Duran, Danielle	Picaro, Willie, Abiqun, NM
Ellis, Matthew, Santa Fe, NM	Pitt, Susan, Chamisal, NM
Eske, Ken	Powell, Thomas, Albuquerque, NM
Finch, Helen, Espanola, NM	Power, M, Veneta, OR
Finch, Gene, Espanola, NM	Prooyen, Jan
Frost, Noelle	Putnam, Patricia, Fairview, NM
Frostenson, Candace, Los Alamos, NM	Pyatt, Julia, El Prado, NM
Fuentez, Jenny, Trucla, NM	Pyle, Sasha, Santa Fe, NM
Garcia, Lupe, Santa Cruz, NM	Raborn, Gail, Raie Dartar, NM
Gellis, Guido, Espanola, NM	Rael-Delay, Anna, Santa Fe, NM
Gerena, Sharow, Santa Cruz, NM	Redman, Cynthia, Espanola, NM
Gibson, Robert, Los Alamos, NM	Reichelt, Lauren
Goforth, Kerby, Meadanales, NM	Riedel, Elizabeth, Embudo, NM
Goldstein, Jon	Rink, Ellen, Llano, NM
Gray, Lance, Llano, NM	Rundstrom, Pat, Espanola, NM
Gray, Marlene, Llano, NM	Sanchez, Kathy, Santa Fe, NM
Hall, Jim	Sanchez, Filimon, Chamisal, NM
Heinrichs, Todd, Los Alamos, NM	Sanders, Gilbert, Santa Fe, NM
Hendrie, Ann, Ojo Sarco, NM	Sedillo, Peblo, Santa Fe, NM
Hennera , Susan	Seybold, Debbie, Espanola, NM
Hiller, Stephanie, Alb, NM	Sollitt, Shannon, Santa Fe, NM
Hodge, W, Dixon, NM	Speath, Thea, Ojo Sarco, NM
Honstein, Eibrta, Espanola, NM	Starke, Tom
Huelsmann, Kevin, Espanola, NM	Sutherland, Julie
Kaur, Gurprasad, Espanola, NM	Sutherland, Alan
Khalsa, Siri, Espanola, NM	Twocrows, Alice, Chamisal, NM
Khalsa, Gurubachan, Albuqueque, NM	Ulbarri, Rick, Los Alamos, NM
Khalsa, Gurumeet, Espanola, NM	Vergara, Sylvia, Dixon, NM
Kholse, Lolene, Santa Cruz, NM	Vigil, Maria
Killeen, John	Vigil, Donnie, Espanola, NM
Knutsen, Henry, Chamisal, NM	Wade, Rod, Espanola, NM
Kotowski, Sheri, Dixon, NM	Wallace, Jeannette, Los Alamos, NM
Kovac, Scott	Webster, Astrid
Kovacevich, Miro, Espanola, NM	Word, Jim, Velarde, NM
Kovacevich, Zirana, Espanola, NM	Yanicak, Steve, Santa Fe, NM

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Kuerschner, Erich	Zachritz, Helenmanie, Espanola, NM
Larson, Melissa	Zugler, Rachel

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Baldwin, Elizabeth	Gordon, Judy	Kushner, Adele	Reilly, Mary
Ballew, Wende	Gurr, Henry	Lewis, Marcus	Reilly, Molly
Barnwell, Micah	Gustin, Iza	Lindsey, John	Richardson, Don
Brewer, Krista	Hill, Amanda	Miklethun, Betsey	Rudolph, Gerald
Bridgman, Jim	Honicker, Jeannine	Minerd, Leslie	Russell Iv, Fielding
Carroll, Glenn	Hughes, Anne	Mitchell, Michele	Sallywhite, Ronnie
Cooper, Elaine	Hunnicutt, Ella	Nguyen, Hannah	Spencer, Dane
Evans, Peter	Jacobs, David	Olson, Mary	Stocker, Judith
Feig, Danny	Joye, Barbara	Patrie, Lewis	Tatum, Gloria
Fleck, Martin	Karris, Kim	Paul, Bobbie	Uhrich, Jack
Garcia, Christian	Keith, Susan	Phelps, Kris	Valentin, Dianne
February 21, 2008 – North Augusta, SC (Evening session)			2-1384
Arnold, Ed	Chaput, Ernie	Lindsey, Hildy	Rogers, Harry
Bobbitt, Nancy	Clements, Tom	Rivard, Betsy	Wolfe, Clint
Bussey, Eddie	Jobe, H.R.		
February 26, 2008 – Oak Ridge, TN (Afternoon session)			2-1388
Barakat, Yusif	Deichman, Shane	Larsen-Clark, Brita	Parko, Joseph
Barger, Elizabeth	Duncan, Woody	Leaverton, David	Ramm, Hartmut
Barnette, Joan	Ewald, Linda	Lenhard, Joe	Rundle, Bob
Beehan, Tom	Farmer, Mike	Lentsch, Mary	Sam, Deborah
Bergier, Kim	Felsing, Richard	Lester, James	Scarbrough, Paul
Beziat, Pamela	Felsing, Joann	Marion, Bob	Sexton, Doug
Bliss, Rachael	Fisher, Homer	Markle, Judy	Shoopman, Winfred
Bone, Gerald	Griswold, Jonathan	Mcclure, Gene	Short, Linda
Bowers, Terry	Hardy, Parker	Mcnally, Jan	Stark, Leonard
Bradshaw, Mike	Hickey, William	Melson, Jeff	Stark, Walter
Breeden, G.A.	Hutchison, Ralph	Meyer, Karl	Struss-Keyes, Glenda
Broome, Gina	Irwin, Eva	Miller, Jane	Sulock, Dot
Brown, Dave	Johnson, Erik	Modica, Linda	Thomas, Zack
Bryan, Mary	Johnson, W.E.	Morehead, Tupper	Twine, Michael
Carroll, Glenn	Jones, Virginia	Navarro-Valenti, Susana	Van Der Harst, John
Chinn, Rick	Jones, Steve	Nicholson, Inca	Vineyard, Randy
Clark, Don	Kindfield, Noah	Nicholson, Amy	Whalen, John
Cox, Shirley	Kindfield, Peter	O'Hara-Bruce, Sharon	Whitley, Gary
Crowe, Charles	Kuykendall, Charlie	Osmand, Pam	Wingeier, Stephen
Dale, Sigrid	Lamberts, Frances		
February 26, 2008 – Oak Ridge, TN (Evening session)			2-1405
Bell, Glenn	Fields, Eric	Johnson, Libby	Nickle, Bill
Box, Howard	Free, Rev. Marcia	Jones, Rex	Quinn, Judy
Broome, Gina	Gertsen, John	Lugo, Chris	Samuels, Charles
Clark, John	Green, Carol	Mattson, Gail	Scarbrough, Darin

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Coker, Jason	Hennigan, Richard	Mcleod, Emma	Sullivan, Judy
Collier, Thomas	Hensley, Charlie	Mcleod, Lissa	Sullivan, Edward
Collins, Kevin	Hope, Chuck	Mead, Steven	Trew, Tom
Collins, Cindy	Horning, Douglas	Messerli, Doug	Wascom, Shelley
Conti, Maurizio	Human, Gary	Myers, Bill	Wilcox, Bill
Dunlap, Sandy			
February 28, 2008 – Amarillo, TX (Afternoon session)			2-1411
Allison, Pam	Finegold, Allen	Montgomery, Lorita	Simms, Jim
Egan, Jean	Gordon, Susan	Nordhausen, Ray	Smith, Doris
Egan, Tom	Hinsley, Joyce	Pritchett, Steve	Venable, Minnie
Fields Johnson, Mina			
February 28, 2008 – Amarillo, TX (Evening session)			2-1417
Burnam, Lon	Finegold, Allen	Gordon, Susan	Kovac, Scott
March 4, 2008 - Tonopah, NV (Evening session)			2-1419
Eason, James	Marlow, Rolly	Ralph, Garcia	Stillwell, Kelly
Eastley, Joni	Maslach, Joe	Scarine, Richard	Theodore, Steve
Elliston, Jerry	McLauchlin, Jay	Smith, Roger	Toany, Ed
Galli, James	Misita, David		
March 6, 2008 - Las Vegas, NV (Afternoon session)			2-1423
Amidon, John		Morton, Jenna	
Bautista, Cara		Zabarte, Ian	
Ediger, Peter		Zawada, Jerome	
Gutierrez, Juan			
March 6, 2008 - Las Vegas, NV (Evening session)			2-1429
Bartholomae, Lyla	Leskys, Al	Robert, Alexandria	Thomasson, Catherine
Hiatt, John	Rice, Megan	Spychala, Michael	
March 10, 2008 - Socorro, NM (Evening session)			2-1431
Beason, Doug	Harrington, Steve	Mello, Greg	Stillion, Kay
Gordon, Susan	Kovac, Scott	Romero, Van	
March 11, 2008 - Albuquerque, NM (Afternoon session)			2-1433
Amstutz, Anita	Chavez, Sue	Hancock, Don	Scimonelli, Rosalie
Barrett, Floy	Clark, David	McCoy, Dave	Thompson, Sally Alice
Beason, Doug	Collonge, Chylsea	Nells, Greg	Wallace, Terry
Brown, Joan	Donville, Sylviana	Perrotti, Marlene	Weakee, Sonny
Bunting , Dorie	Good, Marlin	Press, Robert	Weloster, Astrid
Calkins, Joann	Gross, Sharon	Ryan, Bud	
March 11, 2008 - Albuquerque, NM (Evening session)			2-1441
Anatasio, Michael	Evans, Janice	Kerlinsky, Dan	Schrader, Don
Bean, Kevin	Fluegge, Claudia	Lambert, George	Sensenig, Anne
Beems, William	Greenwald, Janet	Mara, Glenn	Thompson, Sally-Alice
Blankenship, Tiska	Harrison, Richard	McCoy, Dave	Webster, Astrid
Burrus, Nell	Harrison, Ann	Nicholas, Louis	Woodard, Joan
Doppke, Mark	Hasking, Chuck	Rich, Jeffrey	Zigler, Suzanne
Eichhorn, Paule	Hostetter, Richard		

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Public Hearing Speakers			Document Page Number
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Anastasio, Mike	Grothus, Ed	Martinez, Johnnie	Starke, Tom
Balog, John	Hall, James	Martz, Joe	Stratton, William
Bernstein, Lee	Hockaday, Mary	Milder, Ken	Wallace , Jeannette
Davis, Bart	Johnson, Debra	Rofer, Cheryl	Webster, Astrid
Dreicer, Jared	Leoasure, Craig	Seestron, Susan	WEISS, Don
Eerikson, Dennis	Mallory, Mike	Sollitt, Shannyn	White, Paul
Gordon, Susan	Mara, Glenn		
March 13, 2008 - Los Alamos, NM (Afternoon session)			2-1454
Arends, Joni	Clark, David	Popa-Simil, Liviu	Thomson, David
Baek, Joanne	Fahringer, Alan	Primak, Stan	Torney, David
Beaumont , Holly	Hanson, Eali	Scimonelli, Rosalie	Ventura, Jon
Burns, Carol	Kane, Suzy	Solitt, Shannyn	Wilbanks, Jessica
Burns, Michael	Kuerschner, Erik		
March 13, 2008 - Santa Fe, NM (Evening session)			2-1461
Anastasio, Michael	Glasco, Tim	Lewis, Chris	Paisner, Jeffery
Arends, Joni	Goldstine, Phil	Lindberg, Francine	Perea, Jacob
Bacon, David	Gollub, Bruce	Logan, Priscilla	Prince, Peggy
Bernstein, Robert	Gonzales, John	Louato, Anhara	Procter, Rebecca
Bonehead, D.	Goodluck-Barnes, Shea	Lustig, Jan	Pyle, Sasha
Burckle, Ed	Gordon, Susan	Mallory, Mike	Quintana, Louisa
Burns, Sheila	Green, Joan	Martz, Joe	Robinson, Garrett
Christison, Willam	Hall, Jim	mazeauol, dominique	Schief, James
Clark, David	Hibbs, Linda	Mcarthur , Diana	Shalev, Lorenna
Coghlan, Jay	Holloway, Colin	McMillan, Charlie	Skinner, Elliott
Collins, Michael	Holmes, Rick	McMullen, Penelope	Solitt, Shannyn
Cooper, Kate	Johnson, Richard	Mello, Greg	Sperlich, Betty
Dean, Dorothy	Keightley, Dorothy	Miller, Virginia	Stpiene, Elana
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Adams, Phillip	Dorabji, Tara	Klotz-Chamberlin, Peter	Ruyle, Eugene
Ault, Jahsiah	Dow, Jerry	Larkin, Don	Sarabia, Michael
Bautista, Cara	Edwin, Marjorie	Leider, Marj	Sekai, Robert
Binkley, Thad	Foster, Eleanor	Logan, Roger	Smith, Mark
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Brink, Toby	Griffin, Rebecca	Miller, George	Swyers, Matthew
Brown, Betty	Harwood, Jan	Neal, Louise	Thomas, Aaron
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Carroll, David	Horn, Alan	Nesbitt, Dale	Walt, Michael
Chamberlin, Liz	Jardine, Phyllis	Oldfather, John	Wiedemann, Sandee
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Bosche, Lynne	Hosokawa, Kohji	Moore, Patricia	Shirley, John
Cabasso, Jackie	Kate-Turner, Janice	Murray, Kathryn	Stanley, David
DeVries, Jedidyah	Kelley, Marylia	O'Brien, Hank	Stormoen, Steve
Enberg, Catherine	Kimber, John	Olin, Phyllis	Swyers, Matthew
Geschwind, Michael	King, Beverly	Perner, Mary	Veiluva, Michael
Gleason, Ken	Leeper, Steve	Pinkard, ML	Vitale, Louis
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March 25, 2008 - Washington, DC (Afternoon session)			2-1505
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Fuchs, Katherine	Moffat, Pamela	Ventura, John	Zaebst, Emily
Gordon, Susan			
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Baek, Joanne	Hendrie, Ann	Martinez, Johnnie	Speath, Thea
Beaumont, Holly	Kovac, Scott	Miller, Carol	Starke, Tom
Burns, Michael	Kovacevich, Miro	Morrison, Alva	Sutherland, Julie
Clark, David	Kuerschner, Erich	Nichols, Jean	Sutherland, Alan
DeSegovia, Mauricio	Larson, Melissa	Prooyen, Jan	Vergara, Sylvia
Duran, Clarissa	Logghe, Joan	Pyle, Sasha	Vigil, Maria
Duran, Danielle	Logghe, Mike	Sanchez, Gilbert	Wallace, Jeannette
Ellis, Matthew	Lopez, Larrie	Sedillo, Peblo	Webster, Astrid
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Whetsel, Emily, Oak Ridge, TN	2-1250
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Williams, Carmen, Red Oak, IA	2-1261
Williams, Janet, San Diego, CA	2-1261
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Williams, Mary, Salt Lake City, UT	2-1264
Williams, Richard, Sierra Vista, AZ	2-1264
Williams, Susan, Lakewood, CO	2-1265
Williamson, Abby, Wilmington, NC	2-1265
Willis, Suzanne, De Kalb, IL	2-1266
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Zamora, Gloria J., Santa Fe, NM	2-1303
Zappone, Mark A., Linwood, NJ	2-1304
Zeiger, John, Ardsley, NY	2-1304
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U.S. Department of the Interior, Gregory Hogue, Atlanta, GA	2-483
U.S. Environmental Protection Agency, Susan E. Bromm, Washington, DC	2-121
United States Senate, Bob Corker, Washington , DC	2-211
United States Senate, Kay Bailey Hutchison, Washington, DC	2-501
United States Senate, Lamar Alexander, Knoxville, TN	2-9
United States Senate, Pete V. Domenici, Washington, DC	2-265
United States Senate, Russ Feingold, Washington, DC	2-322
United States Senate, Saxby Chambliss, Washington, DC	2-161
United States House of Representatives, Tammy Baldwin, WI	2-48
United States House of Representatives, John J. Duncan, Knoxville, TN	2-275
United States House of Representatives, Zach Wamp, Oak Ridge, TN	2-1234
Native American Tribal Representatives	
Navajo Nation, Tony Joe, Window Rock, AZ	2-527
Pueblo de San Ildefonso, New Mexico, Leon T Roybal, Santa Fe, NM	2-1056
Santa Clara Pueblo, J. Michael Chavarria, Espanola, NM	2-167
Timbisha Shoshone Tribe, Joe Kennedy, Bishop, CA	2-575
Western Shoshone National Council, Ian Zabarte, Las Vegas, NV	2-1292
State and Local Agencies and Elected Officials	
Anderson County Board of Commissioners, Thomas Alderson, Clinton, TN	2-9
California Legislature Assembly, Guy S. Houston, Livermore, CA	2-493

Table 1.3-5—Index of Commentors, Organizations and Public Officials

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City of Alcoa, Office of the Mayor, Kim Wade, Alcoa, TN	2-1227
City of Amarillo, Debra McCartt, Amarillo, TX	2-721
City of Amarillo, Jim Simms, Amarillo, TX	2-1112
City of Amarillo, Madison Scott, Amarillo, TX	2-1096
City of Amarillo, Ron Boyd, Amarillo, TX	2-112
Cities of Oak Ridge, Knoxville, Clinton, Farragut, and Kingston, Tom Beehan, Troy Beets, Eddy Ford, Bill Haslam, and Winfred Shoopman, Knoxville, TN	2-449
City of Oak Ridge, Thomas Beehan, Oak Ridge, TN	2-70
City of Santa Fe, David Coss, Santa Fe, NM	2-225
Kingston, Tennessee, Office of the County Executive, Mike Farmer, Kingston, TN	2-319
Los Alamos County Council, James W. Hall, Los Alamos, NM	2-422
Los Alamos County, Anthony Mortillaro, Los Alamos, NM	2-814
Morgan County, TN, Becky Ruppe, Wartburg, TN	2-1063
New Mexico Environment Department, Marissa Stone, Santa Fe, NM	2-1146
New Mexico Environment Department, Ron Curry, Santa Fe, NM	2-240
Nye County Board of County Commissioners, Joni Eastley, Tonopah, NV	2-283
Nye County Board of County Commissioners, Joni Eastley, Tonopah, NV	2-285
Nye County Board of County Commissioners, Lorina Dellinger, Tonopah, NV	2-255
Office of the Governor, Nevada, Jim Gibbons	2-365
Office of the Governor, Tennessee, Phil Bredeson, Nashville, TN	2-118
State of Nevada, Office of the Governor, Agency for Nuclear Projects, Robert R. Loux, Carson City, NV	2-669
State of New Mexico, House of Representatives, Jeannette Wallace, Los Alamos, NM	2-1230
State of Tennessee, Department of Environment and Conservation, John A. Owsley, Oak Ridge, TN	2-873
State of Texas, House of Representatives, Warren Chisum, Austin, TX	2-188
State of Texas, House of Representatives, John Smithee, Austin, TX	2-1121
State of Texas, House of Representatives, David Swinford, Amarillo, TX	2-1160
State of Texas, Lieutenant Governor, David Dewhurst, Austin, TX	2-260
State of Texas, Senate, Kel Seliger, Austin, TX	2-1099
Taos County Commission, Julia L. Valerio, Taos, NM	2-1209
Tennessee Department of Economic and Community Development, Matt Kisber, Nashville, TN	2-596
Tonopah Town Board, Cindy Kaminski, Tonopah, NV	2-536
Wisconsin State Assembly, Frederick P. Kessler, Madison, WI	2-590
Other Organizations and Businesses	
Alliance for Nuclear Accountability, Alfred Meyer, Washington, DC	2-774
Alliance for Nuclear Accountability, Alfred Meyer, Washington, DC	2-775
Amarillo Chamber of Commerce, Gary Molberg, Amarillo, TX	2-801
American Friends Service Committee, Amsa Virji, Washington, DC	2-1220
American Friends Service Committee, Stephen McNeil, San Francisco, CA	2-768
Anderson County Chamber of Commerce, Rick Chinn, Kingston, TN	2-187
Archdiocese of Detroit, Thomas Gumbleton, Detroit, MI	2-413
Atomic Trades & Labor Council, William Earl Johnson, Rockwood, TN	2-529

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Commentor Information	Document Page Number
B&W Y-12 Community Relations Council, Homer Fisher, Oak Ridge, TN	2-330
Blue Ridge Environmental Defense League, Charles Utley, Augusta, GA	2-1203
Burns and Roe, Inc., Ted Gado	2-345
Campaign for a Nuclear Weapons Free World, Martin Fleck, Washington, DC	2-332
Carson Forest Watch, J Berde, Amarillo, TX	2-78
Citizen Action New Mexico, David B McCoy, Albuquerque, NM	2-725
Citizens for Alternatives to Chemical Contamination, Kay Cumbow, Lake, MI	2-237
Citizens for Alternatives to Radioactive Dumping, Janet Greenwald, Albuquerque, NM	2-402
Citizens for Nuclear Technology Awareness, Clint Wolfe, Aiken, SC	2-1273
Concerned Citizens for Nuclear Safety, Joni Arends and Robert Gilkeson	2-24
Diversified Consulting, Inc., William Kelly Dagenhart, Oak Ridge, TN	2-243
Don Gabino Andrade Community Acequia Association, Thomas Powell, Albuquerque, NM	2-977
East Bay Economic Development Alliance, Keith Carson, Oakland, CA	2-154
Embudo Valley Environmental Monitoring Group, Sheri Kotowski, Dixon, NM	2-609
Embudo Valley Environmental Monitoring Group, Sheri Kotowski, Dixon, NM	2-610
Embudo Valley Environmental Monitoring Group, Sheri Kotowski, Dixon, NM	2-612
Energy, Technology and Environment Business Association, Alice Q. Murphy, Oak Ridge, TN	2-819
Faithful Security, Tara Morrow, Washington, DC	2-812
Freedom Socialist Party, Freedom Socialist Party, Seattle, WA	2-923
Friends Committee on National Legislation, Devin Helfrich	2-457
G2 Engineering & Management, Inc., Francheska Parkman, Oak Ridge, TN	2-920
G2 Engineering & Management, Inc., Michael L Twine, Oak Ridge, TN	2-1195
Gray Panthers of Greater Albuquerque, Emil Shaw, Albuquerque, NM	2-1104
HOME (Healing Ourselves and Mother Earth), John Hadder, Reno, NV	2-416
Information International Associates, Inc., Carroll, Bonnie C, Oak Ridge, TN	2-150
Institute for Energy and Environmental Research, Arjun Makhijani, Takoma Park, MD	2-685
Knoxville Chamber of Commerce, Michael Edwards, Knoxville, TN	2-290
La Jicarita Watershed & Wastewater Study Committee, Tanya Leherissey	2-634
Lehigh-Pocono Committee of Concern, Maria Weick, Bethlehem, PA	2-1239
Los Alamos Chamber of Commerce, Kevin Holsapple, Los Alamos, NM	2-489
Los Alamos Committee on Arms Control and International Security, Cheryl Rofer, Los Alamos, NM	2-1050
Nashville Greenlands, Karl Meyer, Nashville, TN	2-779
Natural Resources Defense Council, Christopher E Paine	2-874
Natural Resources Defense Council, Christopher E. Paine, Washington, DC	2-875
Navarro Research and Engineering, Inc., Susana Navarro-Valenti, Ph.D, Oak Ridge, TN	2-826
Nevada Minority Business Enterprise Center, Horacio Lopez, Las Vegas, NV	2-667
New America Foundation, William D. Hartung	2-446
New Mexico Acequia Association, Paula Garcia, Santa Fe, NM	2-350
Nipponzan Myohoji, Gyoshu Utsumi, Atlanta, GA	2-1205
NM Department of Peace Initiative, Virginia J Miller, Santa Fe, NM	2-787

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Nuclear Watch New Mexico, Cathie Sullivan, Santa Fe, NM	2-1152
Nuclear Watch New Mexico, Jay Coghlan, Santa Fe, NM	2-202
Nuclear Watch New Mexico, Santa Fe Public Meeting Hand-in, Santa Fe, NM	2-428
Oak Ridge Environmental Peace Alliance, Ralph Hutchison	2-501
Oak Ridge Local Oversight Committee, Ellen D. Smith, Oak Ridge, TN	2-1118
Oak Ridge Reservation Local Oversight Committee, Susan Gawarecki	2-360
Pax Christi New Mexico, Bud Ryan	2-1067
Pax Christi, Joseph Nangle, Erie, PA	2-824
Peace Action New Mexico, Peggy Prince	2-981
Peace Farm, Mavis Belisle, Panhandle, TX	2-73
Peaceworkers, David Hartsough, San Francisco, CA	2-444
Physicians for Social Responsibility, Michael McCally	2-717
Religious Action Center of Reform Judaism, Jonah Perlin, Washington, DC	2-955
Roane Alliance, Leslie Henderson, Kingston, TN	2-466
Saint Joseph Church, Larry Bernard, Laguna, NM	2-86
Santa Fe Chamber of Commerce, Simon Brackley, Santa Fe, NM	2-114
SCI Consulting Services, Inc., Patty Baird, Oak Ridge, TN	2-45
Sierra Club of South Carolina, Joe Whetstone, Bluffton, SC	2-1251
Sierra Club, Judy Gordon, North Augusta, SC	2-378
Sierra Club, Linda Modica, Jonsborough, TN	2-798
Sisters of Mercy of the Americas, Our Lady of the Sacred Heart Convent, Maralynn Sciarrino, Orchard Park, NY	2-1095
SOC, Larry Ames, Minden, NV	2-12
SOC, Kenneth M. Freeman, Los Alamos, NM	2-339
Society for Threatened Peoples International, Yvonne Bangert	2-49
South Carolina Christian Action Council, Gerald Rudolph, Columbia, SC	2-1060
Southwest Research and Information Center, Don Hancock, Albuquerque, NM	2-425
Southwest Research and Information Center, Paul Robinson, Albuquerque, NM	2-1008
SRS Community Reuse Organization, William R. Toole, Aiken, SC	2-1186
Tewa Women United, Kathleen Sanchez, Santa Cruz, NM	2-1074
Tri-Valley CAREs, Marylia Kelley, Livermore, CA	2-544
Tri-Valley CAREs, Marylia Kelley, Livermore, CA	2-558
Tri-Valley CAREs, Marylia Kelley, Livermore, CA	2-564
Tri-Valley CAREs, Marylia Kelley, Livermore, CA	2-566
Union of Concerned Scientists, Stephen Young, Cambridge, MA	2-1280
University of Tennessee, Office of the Executive Vice President, David Millhorn, Knoxville, TN	2-789
Women's Action for New Directions, Krista Brewer, Atlanta, GA	2-119

Table 1.3-6—Index of Commentors, Multiple Signatory Documents

Commentor Information	Document Page Number
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Table 1.3-6—Index of Commentors, Multiple Signatory Documents

Commentor Information	Document Page Number
Multiple Signatory Letter 2 Macks, Vic Macks, Gail	2-1308
Multiple Signatory Letter 3 Bodley, William Bodley, Roberta	2-1309
Multiple Signatory Letter 4 Bickerstaff, Mary Bickerstaff, John	2-1310
Multiple Signatory Letter 5 Kell, Ray Kell, Vivianne	2-1310
Multiple Signatory Letter 6 Sieber, Mildred Sieber, Graeme	2-1311
Multiple Signatory Letter 7 Stark, Leonard Stark, Betty	2-1311
Multiple Signatory Letter 8 Honstein, Elberta Seyfold, Debbie	2-1312
Multiple Signatory Letter 9 McMahon, George McMahon, Patricia	2-1312
Multiple Signatory Letter 10 Caley, Don Caley, Veronica	2-1313
Multiple Signatory Letter 11 Smith, Doris Smith, Phillip	2-1313
Multiple Signatory Letter 12 Fehribach, Robert Fehribach, Marie	2-1315
Multiple Signatory Letter 13 Parker, Augustin Parker, Janet Fitch	2-1315
Multiple Signatory Letter 14 Geary, Maurice Geary, Frances	2-1316
Multiple Signatory Letter 15 Klosterman, Charles Klosterman, Bernice	2-1316
Multiple Signatory Letter 16 MacDougall, John	2-1317

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MacDougall, Marilyn	
Multiple Signatory Letter 17 Switzer, Gary Switzer, Gloria	2-1317
Multiple Signatory Letter 18 Martin, Michael Martin, Mary	2-1318
Multiple Signatory Letter 19 Halverson, Herb Halverson, Roberta	2-1319
Multiple Signatory Letter 20 Cooper, Bill Cooper, Margo	2-1319
Multiple Signatory Letter 21 Johnson, Sherwood Johnson, Shawna	2-1320
Multiple Signatory Letter 22 Wynegar, Tom Wynegar, Kathy	2-1320
Multiple Signatory Letter 23 Pierce, Elliot Pierce, Vivianne	2-1321
Multiple Signatory Letter 24 Meadows, Susan Johnson, Paul	2-1321
Multiple Signatory Letter 25 Skinner, Kathleen Skinner, John	2-1322
Multiple Signatory Letter 26 Alcock, John Alcock, Sue	2-1322
Multiple Signatory Letter 27 Locher, John Locher, Laura	2-1323
Multiple Signatory Letter 28 Seaver, LaRoy Seaver, Mary	2-1323
Multiple Signatory Letter 29 Morris, Linda Morris, Joel	2-1324
Multiple Signatory Letter 30 Stone, Liz Stone, Bob	2-1324

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Multiple Signatory Letter 31 Moore, Maridale Moore, William	2-1325
Multiple Signatory Letter 32 Almond, Paul Almond, Joan	2-1325
Multiple Signatory Letter 33 Korman, Bonnie Bishop, Robert	2-1326
Multiple Signatory Letter 34 Coggins, Nathan Coggins, Kathey Coggins, James Coggins, Chelsey	2-1326
Multiple Signatory Letter 35 Jabir, Eduar Jose Agar	2-1327
Multiple Signatory Letter 36 Blickensderfer, Peter Blickensderfer, Mary	2-1332
Multiple Signatory Letter 37 Gamble, George Gamble, Dorothy	2-1333
Multiple Signatory Letter 38 Mason, Ronald Mason, Joyce	2-1333
Multiple Signatory Letter 39 Huisingh, Donald Huisingh, Jo R.	2-1334
Multiple Signatory Letter 40 Koeferl, John Judice, Vicki	2-1334
Multiple Signatory Letter 41 McKirgan, Carl McKirgan, Sally	2-1335
Multiple Signatory Letter 42 Reading, George Reading, Margery	2-1335
Multiple Signatory Letter 43 Hutchison, Ralph Degutis, Beth Degutis, Victor G. Gilbert, Kate Vogado, Christopher Holliday, Laura	2-1336

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Commentor Information	Document Page Number
Flynn, Mindy Shafer, Andy Rincon, Ryan Potocik, Jon Wellons, Dustin Rosen, Jonathan Yamada, Yukihiro Kenner, Faye Downs, Sarah McMillan, Hannah Luke, Nora Sharp, Brett Marty, Will Brandon, William Rich, Sarah LaRue, Rachel Luke, Susan	
Multiple Signatory Letter 44 Hutchison, Ralph Osborne, Larry Guy Karr, Susan Morton, Ken Sites, Millicent M., Ph.D Hawkins, Mel Ingle, Larry Brunger, Scott Ashley, Fran Ambler, Susan Nolt, John Mendola, Annette Douglas, Heather	2-1338
Multiple Signatory Letter 45 Robinson, Jane Robinson, Jerry	2-1340
Multiple Signatory Letter 46 Sidman, Joe Sidman, Kelly	2-1340
Multiple Signatory Letter 47 Hodge, Ward Hodge, Dorothy	2-1341
Multiple Signatory Letter 48 Seaver, LaRoy Seaver, Mary	2-1342
Multiple Signatory Letter 49 Seaver, LaRoy Seaver, Mary	2-1342
Multiple Signatory Letter 50 Kaminski, Cindy	2-1343

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Campos, Paul Hawkins, Thomas Mukerns, Chris	
Multiple Signatory Letter 51 Newbauer, Don Newbauer, Ellen	2-1344
Multiple Signatory Letter 52 Wassmuth, Carol Oakley, Arlene Cooper, Katie Angela (Illegible) Wenhoff, Placida Manderfield, Catherine Heiand, Sylveria Kachelmier, Valerie Lalanda, Jean Olin, Wendy Harris, Cynthia Goeckmer, Clarissa Goeckmer, Mary Marge Foreman, Coranne Drank, Theresa Uhloan, Cecile Marie Drefler, Sue Ellen Reichler, Agnes	2-1344
Multiple Signatory Letter 53 Schwartz, Ethel Block, Randy	2-1345
Multiple Signatory Letter 54 Carey, Donna Ellen O Farrell Em A Sandi McDaniel Patricia Mare Mary Mascarenas Jessica Rodarte Ambrose Mascarenas Randy Miller Santiago Sopez Joanie Bende Rose Caminiti Neal Thielbe Sam Starsiak Tanya Lebherissey Patrick Tujito Bob Andrews Pam Lytle John Bernasconi Gabriel Gonzales Dawn Gottschau	2-1345

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Commentor Information	Document Page Number
Prairie Gottschau Larry Gottschau Maggie Younger Alberto Castagna Leroy Fretzey Zero Blanca Illegible Illegible Michael Jurica Vista Jurica	
Multiple Signatory Letter 55 Sweeton, Beverly Sweeton, Dan	2-1346
Multiple Signatory Letter 56 Cabasso, Jackie Blum, Marty Coody, Dan Hosterman, Jennifer Bragman, Lawrence	2-1347

Table 1.3-7—Campaign Comment Documents

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Campaign 1	2-1349
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Campaign 3	2-1350
Campaign 4	2-1350
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Table 1.3-7—Campaign Comment Documents

Commentor Information	Document Page Number
Campaign 27	2-1363
Campaign 28	2-1364
Campaign 29	2-1365
Campaign 30	2-1365
Campaign 31	2-1366
Campaign 32	2-1366
Campaign 33	2-1367
Campaign 34	2-1369
Campaign 35	2-1369
Campaign 36	2-1370
Campaign 37	2-1370
Campaign 38	2-1371
Campaign 39	2-1371
Campaign 40	2-1372

Table 1.3-8—Comments Sorted by Summary Code

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1.0	Nuclear Weapon Policies – General	
1.A	World Court	2-1505
1.B	Presidential Directives, Public Law, and Current Policies	2-10, 2-68, 2-94, 2-1347, 2-156, 2-159, 2-162, 2-190, 2-289, 2-316, 2-341, 2-367, 2-425, 2-457, 2-595, 2-612, 2-630, 2-694, 2-845, 2-854, 2-868, 2-954, 2-987, 2-1135, 2-1144, 2-1150, 2-1188, 2-1205, 2-1207, 2-1217, 2-1229, 2-1247, 2-1280
1.C	Nuclear Posture Review	2-24, 2-43, 2-94, 2-114, 2-119, 2-120, 2-139, 2-149, 2-156, 2-157, 2-167, 2-202, 2-313, 2-321, 2-322, 2-359, 2-375, 2-382, 2-416, 2-436, 2-446, 2-454, 2-455, 2-492, 2-497, 2-501, 2-525, 2-528, 2-533, 2-544, 2-589, 2-599, 2-605, 2-612, 2-624, 2-643, 2-669, 2-700, 2-707, 2-713, 2-714, 2-770, 2-782, 2-787, 2-798, 2-864, 2-867, 2-875, 2-924, 2-995, 2-1076, 2-1083, 2-1124, 2-1128, 2-1135, 2-1228, 2-1229, 2-1249, 2-1257, 2-1259, 2-1280
1.D	New Weapon Design	2-416, 2-627, 2-676, 2-1310
1.E	Comprehensive Test Ban Treaty	2-64, 2-125, 2-144, 2-157, 2-245, 2-268, 2-303, 2-308, 2-325, 2-332, 2-401, 2-445, 2-476, 2-583, 2-637, 2-645, 2-652, 2-654, 2-685, 2-1321, 2-782, 2-813, 2-822, 2-846, 2-1120, 2-1126, 2-1127, 2-1179, 2-1196, 2-1229
1.F	Treaty on the Nonproliferation of Nuclear Weapons	2-3, 2-6, 2-15, 2-24, 2-37, 2-48, 2-62, 2-63, 2-65, 2-69, 2-71, 2-76, 2-82, 2-86, 2-87, 2-91, 2-1310, 2-93, 2-97, 2-98, 2-101, 2-1309, 2-117, 2-119, 2-119, 2-121, 2-124, 2-125, 2-126, 2-130, 2-134, 2-135, 2-135, 2-1347, 2-144, 2-148, 2-148, 2-152, 2-155, 2-157, 2-186, 2-187, 2-198, 2-201, 2-213, 2-215, 2-230, 2-235, 2-237, 2-247, 2-269, 2-269, 2-270, 2-273, 2-280, 2-286, 2-286, 2-288, 2-289, 2-290, 2-292, 2-293, 2-302, 2-304, 2-306, 2-312, 2-316, 2-321, 2-322, 2-332, 2-335, 2-335, 2-336, 2-337, 2-338, 2-343, 2-346, 2-1333, 2-359, 2-1316, 2-363, 2-364, 2-366, 2-373, 2-374, 2-375, 2-378, 2-379, 2-381, 2-383, 2-399, 2-400, 2-402, 2-405, 2-413, 2-413, 2-416, 2-424, 2-425, 2-431, 2-433, 2-433, 2-434, 2-443, 2-444, 2-445, 2-

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1.G	Moscow Treaty	2-846, 2-1257, 2-1263
1.H	Department of Defense Involvement	2-1411, 2-1416, 2-1417
1.I	Not Used	
1.J	Proliferation and Nonproliferation	2-3, 2-3, 2-5, 2-6, 2-7, 2-1322, 2-10, 2-11, 2-12, 2-14, 2-16, 2-17, 2-22, 2-23, 2-23, 2-35, 2-37, 2-38, 2-39, 2-40, 2-41, 2-41, 2-43, 2-46, 2-47, 2-48, 2-55, 2-65, 2-66, 2-67, 2-69, 2-69, 2-71, 2-72, 2-73, 2-75, 2-76, 2-80, 2-89, 2-93, 2-94, 2-1332, 2-99, 2-100, 2-1309, 2-112, 2-117, 2-118, 2-122, 2-123, 2-125, 2-125, 2-128, 2-128, 2-132, 2-133, 2-133, 2-135, 2-136, 2-137, 2-139, 2-143, 2-144, 2-147, 2-147, 2-151, 2-152, 2-155, 2-155, 2-156, 2-157, 2-160, 2-162, 2-163, 2-164, 2-165, 2-186, 2-187, 2-190, 2-190, 2-191, 2-192, 2-193, 2-194, 2-194, 2-196, 2-197, 2-198, 2-200, 2-1326, 2-202, 2-214, 2-219, 2-225, 2-228, 2-229, 2-233, 2-235, 2-241, 2-245, 2-246, 2-246, 2-247, 2-248, 2-249, 2-251, 2-258, 2-259, 2-269, 2-269, 2-270, 2-274, 2-275, 2-279, 2-281, 2-282, 2-286, 2-287, 2-288, 2-288, 2-290, 2-302, 2-304, 2-305, 2-306, 2-308, 2-310, 2-312, 2-312, 2-313, 2-315, 2-316, 2-317, 2-1315, 2-323, 2-324, 2-325, 2-328, 2-329, 2-329, 2-330, 2-332, 2-332, 2-335, 2-336, 2-336, 2-337, 2-338, 2-339, 2-340, 2-341, 2-342, 2-343, 2-343, 2-344, 2-346, 2-347, 2-348, 2-349, 2-349, 2-357, 2-358, 2-359, 2-363, 2-1316, 2-363, 2-364, 2-367, 2-368, 2-369, 2-369, 2-371, 2-372, 2-373, 2-374, 2-375, 2-378, 2-381, 2-382, 2-382, 2-383, 2-398, 2-400, 2-401, 2-401, 2-405, 2-413, 2-416, 2-416, 2-419, 2-423, 2-423, 2-431, 2-433, 2-433, 2-434, 2-443, 2-444, 2-445, 2-446, 2-448, 2-450, 2-451, 2-452, 2-453, 2-455, 2-457, 2-465, 2-470, 2-471, 2-473, 2-474, 2-476, 2-478, 2-479, 2-482,

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Comment Response Document, Chapter 2
COMMENT DOCUMENTS

Comment Response Document, Chapter 2
COMMENT DOCUMENTS

This chapter is a compilation of all the documents that the National Nuclear Security Administration (NNSA) received on the *Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement* (SPEIS) during the public comment period. The documents are presented alphabetically. On each document the first number represents the comment number within that document and the second number represents the issue summary code assigned to this comment. This number can be used to locate the summary and response relating to this comment. Section 1.3 describes the organization of this Comment Response Document and discusses the tables provided in Chapter 1 to assist readers in tracking their comments to the respective comment summary and response.

Aaron, Edwards
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PC_260

March 20, 2008

Ted Wyka
NNSA
Office of Transformation NA-10.1
100 Independence Avenue S.W.
Washington, DC 20585

Dear Mr. Wyka,

I am writing to you from the Tonopah Chamber of Commerce to let you know that the Chamber and its membership fully support Chairman of the Nye County Commission, Joni Eastley, in her stand regarding the possible downsizing/closure of the Tonopah Test Range.

As Commissioner Eastley stated, the socio-economic impact on the town of Tonopah would be devastating. When you look at taking away not only the good paying jobs at TTR, but also the loss of other members of our small community, it is a loss we cannot afford to take.

Tonopah took a very large hit from which we have never fully recovered when the US Government moved the Stealth to New Mexico. To be hit again at this time would be a blow from which I fear we would never recover.

1|6.C.1 This small town needs all of its citizens intact in order to function. As Commissioner Eastley made clear, we would lose a majority of our volunteer fire fighters, EMT's, search & rescue squad members and members of the ELKS, the Rotary, and numerous other service organizations, as well as the families who are our teachers, nurses, secretaries, clerks, law enforcement personnel and all the other jobs that it takes to make this a viable, livable town.

I know there have to be other alternatives that would do far less damage than what the proposed downsizing/closure of TTR will do to Tonopah. We strongly urge you to adopt one of the other alternatives that will leave not only the TTR, but the town of Tonopah intact.

Please do not be responsible for creating Nevada's newest Ghost Town! I welcome a call from you to offer any further information you may need before making your decision.

Sincerely,

Denise Nelson
Director
Tonopah Chamber of Commerce

Mr. Wyka,
While I did not write the above letter, I do completely agree with its content.
Sincerely,
A. Edwards

Mr. Aaron Edwards
870 Stains Rd.
Fallon NV 89406-3669

P.S. - I work as a Security Police Officer (SPO II) at TTR.

Aarvold, David
Page 1 of 1

PC_435

Buenaflor, Justin

From: david aarvold [soopergreened@yahoo.com]
Sent: Wednesday, March 19, 2008 10:20 AM
To: Complex2030
Subject: how much

1|16A does the usa need enough military destructive force to kill and destroy everything on earth?
does the world cumulatively have this capability?

Be a better friend, newshound, and know-it-all with Yahoo! Mobile. Try it now.

5/1/2008

Abbott, Geraldine

Page 1 of 1

PC_40

February 20, 2008

Dr. Theodore Wyka, Manager
Complex Transformation SPEIS Document
US Dept of Energy
1000 Independence Ave SW
Washington, DC 20585

Sir

I am writing to you as I am unable to attend the hearing on February 26 at New Hope Center, Oak Ridge, TN due to a previous commitment. I wish, however, to comment on the Draft PEIS for Complex 2030/Complex Transformation for Y-12.

1|9H I do NOT want taxpayer dollars spent on the production or stockpiling of WMD. I certainly do not want this in my backyard, or for that matter, in anyone else's. The
2|13A nuclear contamination of the water in a karst terrain region such as ours will be irreparable. Accidents happen and terrorists are likely to increase the odds of that happening. Becoming a major target for any air strike or terrorist attack is not some-
3|13G thing we would be happy to consider, and the transportation of nuclear materials will certainly affect our sense of home and family security in our area of Tennessee.

4|1J I am definitely in favor of the DOE honoring the Nuclear Non-Proliferation Treaty, in fact I would like to see our country rid itself of ALL nuclear weapons. I do not want my grandchildren growing up in a Cold-War-Era fear of total annihilation.

5|1F Ronald Reagan, Colin Powell, Hillary Clinton, Barack Obama, Mike Gravel, and Ron Paul have all spoken out against nuclear weapons, either to disarm entirely, which I support, or at least to reduce drastically the number of these ghastly arms.

Bill Richardson said it very well: "The Non-Proliferation Treaty commits non-nuclear states to forgo nuclear weapons and it commits the nuclear weapons states to the goal of nuclear disarmament. To get others to take the NPT seriously, we need to take it seriously ourselves."

6|16A I hope and pray that the DOE will take these sentiments seriously.

Sincerely,

Geraldine L. Abbott

Ms. Geraldine Abbott
PO Box 545
Pleasant Hill, TN 38578

Abrahamse, Dee

Page 1 of 1

PC_1959

Levens, Matthew

From: Dee Abrahamse [dee@abrahamse.org]
Sent: Friday, April 18, 2008 12:13 PM
To: Complex2030
Subject: Chemistry and Metallurgy Research Replacement Project

Dee Abrahamse
7085 Aivlis Street
Long Beach, CA 90815-3503

April 18, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I am very strongly opposed to the plan to build a plant to produce plutonium pits for nuclear weapons, and to plans to change other nuclear facilities to rebuild the nuclear arsenal. As our country struggles to contain the spread of nuclear weapons to terrorists
2|1J and countries where they could create global devastation, we lose our credibility if we are simultaneously expanding our own nuclear capacity. The Chemistry and Metallurgy Research Replacement project is irresponsible and dangerous, and should be rejected. As a
3|13A Californian, I feel particularly vulnerable to the threat this may pose in the Pacific.

Sincerely,

Dee Abrahamse
562-430-3981

1

Acby, Violette

Page 1 of 1

Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

PC_1061

Written Comment Form

Must be received on or before April 10, 2008.

1|11D

1 When are you going to do vital statistics
It is no longer enough to study water air soil
What about the human especially since
the Cerro Grande Fire of 2000.

2 Please solve the riddle: "why maim the
very people you are trying to protect?"

thank you very much.

Violette ACBY, mother of 4 and grandmother
of one, violette2blue@yahoo.com.

Please use other side if more space is needed.

Comment forms may be mailed to:
Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Comment forms may be faxed to:
(703) 931-9222
or sent by electronic mail to:
complextransformation@nnsa.doe.gov

You may also submit comments through the project website which can be found at:
http://www.complextransformationspeis.com

Espanola, NM

Acker, John

Page 1 of 1

PC_2014

Levens, Matthew

From: John Acker [jrackertaos@yahoo.com]
Sent: Thursday, April 10, 2008 12:08 AM
To: Complex2030
Subject: Stop Bombplex

1|10B I am writing to oppose in the strongest terms the Complex Transformation at the LANL Facilities in Los Alamos, NM. I have been following the monitoring of the Labs for several years now and the dispersal of radioactive particles in ground samples, water samples and air samples has increased drastically throughout northern New Mexico and specifically in the Embudo Valley and Rio Arriba County and even within the city district of Santa Fe, NM. The New Mexico State Environment Department has reported these increases
2|14O in numerous documents and various reputable independent agencies have corroborated the results on behalf of and at the expense of private citizen groups concerned with LANL's dismal failure at radioactive containment. THE PEOPLE OF NORTHERN NEW MEXICO WILL NOT ALLOW OUR COMMUNITIES TO BECOME THE NEXT ROCKY FLATS. The current environmental impact
3|14D; assessments have not adequately addressed the concerns of the citizens living in the area
4|14J; impacted by these expansion plans. This Complex Transformation must be stopped now!
5|14K Sincerely, John R. Acker, 6837 NDCBU, Taos, NM 87571

_____

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1

Addison, R.
Page 1 of 1

PC_2086

Levens, Matthew

From: R Addison [r_addison_apeco@yahoo.com]
Sent: Thursday, April 10, 2008 12:23 PM
To: Complex2030
Cc: R apeco peace keepor Addison
Subject: START II & START III before reduction/no to complex-Transformation...no further

tO all of us citizens...

1|1K The full extent of not having signed the START II & reneging on START III treaties with Russia, only relegates to us that the US Congress is in inimicable cahoots w the Pentagon/ Dept. of War? This is not the time nor is there ever a time to start making more nuclear-Anarchy worldwide, by allowing this nations "nuclear-Armaments" to be increased rather than decreased to below "300 total weapons"
where other nations other than Russia have been. But, not only is "balance" lacking, there is no show for desire by the graft of making "depleted-Weapons" w each and every replacement warhead, and each new bomb causing yet further and exponentially less divestible "clean-Ups" propriety! The mess is archaic, however the amounts not only abstrusely non-Justified in terms of diplomacy-as-Peace, but in terms of the 24/7 alert-System that perpetrates the continuations of "aggressor-Stance".

Allowing any monies to be spend for "killing-Humans: weapons of masse-Annihilation" is plain-Ole, insidious. I ask, and my neighbors desire, that they complex -Transformation be "scrapped" as a hoax for posterity to survive.

2|16A We-the-people want no less than the divesting of nuclear-Armaments, and no further "investing" for a future devoid of laws, as is too morosely the cause of today's insipid "un-Declared" wars on-Going against United Nations and International laws signed by the uS. The US executive office and it's background support by Judicial instigation s for "torture" is only one case.

Do not allow thye reformulation to be making is a farce to rip-Off more tax-Monies, while the nation's economy is fed the lies that "hydrocarbons" do not pollute lungs worse than other toxicities, while not relegating a changeover and alternative-Fuels. The corruption is grafted to those who invest. Stop the leagues of insulting the people.
Stop any passage of this proceedings to maintain nuclear-Armaments as "diplomacy" of aggression, now!

yours, from the peace-Warrior,
"R" Addison

1

Adkisson, Holly
Page 1 of 1

PC_501

Buenaflor, Justin

From: Holly Adkisson [hhadkiss@us.ibm.com]
Sent: Tuesday, February 19, 2008 4:51 PM
To: Complex2030
Subject: Diplomacy Is the Answer

Holly Adkisson
1511-A Lansdale Drive
Charlotte, NC 28205-5788

February 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

I, along with many other North Carolinians, believe diplomacy is the best foreign policy -- both for the United States, and for the world as a whole.

1|16A I therefore strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons. The previous Cold War ended during Reagan's administration -- it would be foolhardy to risk another one now.

2|1J Building this new plant would send the wrong message to other countries, such as Iran, who may be seeking nuclear weapons. While the U.S. is asking others to forego developing nuclear arsenals, it would be the height of hypocrisy to simultaneously try to increase our own capacity to build new nuclear weapons.

3|8A 1|16A (cont) Congress rebuked the Energy Department's last attempts to upgrade the arsenal by defunding the Reliable Replacement Warhead and last year's proposed mega-scale bomb plant. (Thank you!) The CMRR project is another irresponsible new program that Congress should reject.

Sincerely,

Holly Adkisson
704.532.0108

1

Aeby, Ian
Page 1 of 1

PC_1992

Levens, Matthew

From: Ian_Aeby@Emcore.com
Sent: Monday, April 28, 2008 10:47 AM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Theodore Wyka, Complex Transformation SPEIS Manager Office of Transformation, NA-10.1 U.S. Department of Energy/NNSA Washington, DC 20585

Dear Mr. Wyka,

I am a second generation Los Alamos nuclear weapons test scientist. My dad took the only color photo of the Trinity test and from 1976 through 1984 I worked for EG&G in support of the activities of both LANL and LLNL at the Nevada Test Site. I have served as a member of the DOE's Citizen's Advisory Board to LANL and as an environmental advocate on a variety of DOE panels. I am a founding member of the New Mexico Citizens for Clean Air and Water. And while I applaud the Department of Energy for moving forward with plans to consolidate the nation's nuclear weapons complex, I am very concerned about the continued emphasis on Pu pit production in my home town.

1|16A

After a lifetime of careful consideration, I have become convinced that we do not need any new nuclear weapons types or any more of the old varieties. The ones we have in the current stockpile plus the components in reserve at Pantex are more than adequate to cover any imaginable security scenario for the foreseeable future. We do not need the capability to make more or newer nuclear weapons, and the last place on earth that should be considered for this task is Los Alamos.

2|3A; 3|10B

During my time on the CAB we struggled mightily with the extant environmental legacy of the cold war activities within the complex including the monumental effort (and costs) associated with closing the former pit production facility at Rocky Flats. We saw very credible evidence from state and federal agencies that activities at LANL had already resulted in Pu releases onto neighboring properties and into the Rio Grande River. LANL and the DOE have both conceded that parts of the current CMRR have been contaminated beyond usability. It makes no sense to expand this facility at great expense and considerable environmental risk in order to enhance a Pu processing capability that the nation does not need.

4|14O 5|14E.1 1|16A (cont)

Instead, I would strongly recommend that the DOE, in concert with the appropriate Congressional Committees and with active and meaningful public input, formulate a National Policy on Nuclear Weapons before significant effort is applied to restructuring the complex. With a viable and intact nuclear deterrent in our stockpile and limited active threats, this point in history has affords us the luxury of time to make more informed decisions. We should use it wisely.

1|16A (cont)

Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE should focus on shrinking the still-oversized nuclear weapons complex and on maintaining the safety and security of our existing weapons arsenal as the size of our nuclear stockpile is reduced.

8|1J

Sincerely,
Ian Aeby
11836 Kings Canyon Pl. SE
Albuquerque, NM 87123

1

Agha, Moji
Page 1 of 1

Page 1 of 1

PC_2070

Levens, Matthew

From: Moji Agha [mojiagha@yahoo.com]
Sent: Friday, April 18, 2008 5:30 PM
To: Complex2030
Subject: Iran disarmament?

Before the U.S. can be in the legal and the moral position to demand that Iran not to pursue even peaceful indigenous nuclear energy, it should fulfillits own NPT obligations, rather than developing new nuclear weapons, and it should punish the governments of India, Israel, and Pakistan for not joining the NPT. Shame on discriminatory double standards

1|1F

Moji Agha

Project on Culture and Conflict,
University of Arizona, Tucson

Be a better friend, newshound, and know-it-all withYahoo! Mobile. Try it now.

5/19/2008

Ahlgren, Kyle
Page 1 of 1

PC_1425

Levens, Matthew

From: Kyle Ahlgren [ksk833@hotmail.com]
Sent: Thursday, February 07, 2008 12:27 PM
To: Complex2030
Subject: Please reject "Complex Transformation" plan to build nuclear weapons

Kyle Ahlgren
1054 3rd St.
Santa Monica, CA 90403-3704

February 7, 2008

Theodore A Wyka
Complex 2030 SEIS Document Manager
Office of Transformation, U.S. Department of Energy, NA–10.1 1000 Independence Avenue, SW.
Washington, DC 20585

Dear Theodore Wyka:

1|16A The Department of Energy should reject proposed Complex 2030 project.

2|7J Complex Transformation would be environmentally hazardous. Under the proposal, the DOE proposes a Consolidated Plutonium Center which would be capable of producing up to 125 plutonium pits (bomb core) per year.
Instead of creating more radioactive contamination, DOE should cleanup its mess from past production of nuclear weapons.

3|1J The new arsenal would also be bad foreign policy. We need American leadership in convincing countries like Iran and North Korea to forgo nuclear weapons.

Thank you!

By building up its arsenal, the US would essentially be telling the world to "Do as I say, not as I do." Please stop any plans for a modernized nuclear arsenal, so the US can assert its leadership for a global effort to control the nuclear weapons threat.

Sincerely,

Kyle Ahlgren

1

Aikin, Beverly
Page 1 of 1

PC_1073

Buenaflor, Delight

From: Beverly Aikin [bevaikin@lanl.gov]
Sent: Wednesday, March 12, 2008 11:07 AM
To: DIV.Complex.Transformation
Subject: Form Post from Firefox

Last Name=Aikin
First Name=Beverly
Email Address=bevaikin@lanl.gov
Street Address=462 Pruitt Avenue
City=White Rock
State=NM
ZIP Code=87544
Comments=Currently only one government owned facility exists within the DOE and DOD complex for manufacture, research and development of beryllium materials. Beryllium materials are used in numerous defense applications due to their unique properties. Beryllium materials must be processed under special conditions to avoid the inhalation of particulate that 3-5% of the population may become allergic to and potentially develop a life threatening disease from. The current budget and lack of upper level DOE, DOD, NNSA and LANL proponents is going to force the closure of this unique facility. The preferred alternative for non-nuclear materials wants nothing to do with manufacturing particulate beryllium materials. NNSA has shut down beryllium materials manufacturing capability in other complex sites.
Los Alamos National Laboratory should be considered the preferred alternative for beryllium material manufacture, research and development and be given the financial support to keep the Beryllium Technology Facility fully equipped, operational and staffed for DOE and DOD programs.

1|10B

1

Akornreich, D.

Page 1 of 1

PC_2008

Buenaflor, Delight

From: Dnakornreich@aol.com
Sent: Friday, April 11, 2008 11:38 PM
To: DIV.Complex.Transformation
Subject: Complex Transformation Comment

1|10C A significant component of transformation is cost reduction and savings. The DoD has learned that the primary means of saving money is to close bases. Likewise, DOE should consider closing sites to allow the limited budgets foreseen to be sufficient to support the actual work that needs to be done to support NNSA. In terms of minimizing local impact and minimizing impact to programmatic work, NNSA should phase out operations and close the site at Lawrence Livermore National Laboratory (LLNL) and Sandia-CA. The loss of LLNL would minimally impact the overall economy of the northern California economy, unlike almost all other NNSA sites, where closure would be devastating to local economies.

2|7A Programmatically, nuclear-weapons design and engineering could be supported at Los Alamos, especially with reduction in the number of systems in the stockpile. The need for NIF to support stockpile certification is clearly tenuous, and the cost of the project is clearly not commensurate with its benefits. High-explosives R&D and testing could be supported at several sites, including Los Alamos, Pantex, and the NTS. Homeland security support could also be transitioned to other sites given that it does not require significant local experimental requirements.

1|10C (cont) Impacts to LLNL employees could be mitigated because they have a staff population that is nearly 50-y old on average. The employees who do not retire upon the eventual closure of the site could be offered positions at other DOE laboratories, indicating that savings will mostly be realized in minimizing infrastructure costs of maintaining the site. In summary, instead of "spreading the butter thinner" across sites, which makes it difficult to apply sufficient resources at any one site to effectively support programmatic work, DOE/NNSA should make difficult choices so that remaining sites have the personnel and financial resources to support the programs that the country needs.

It's Tax Time! Get tips, forms and advice on AOL Money & Finance.

Albertin, Mark

Page 1 of 1

PC_627

Levens, Matthew

From: Mark Albertin [scrapbk@mindspring.com]
Sent: Saturday, February 23, 2008 1:20 PM
To: Complex2030
Subject: SRS Project

To whom it may concern,

I was not able to attend the town hall meeting on February 21st in North Augusta, but wanted to make my opinion known.

1|7J As a taxpayer and proud citizen of this country, I am appalled at the thought of the development of new tritium production. I realize that in order to maintain our security, we need a strong defense, but I do not see any solution for the stockpiles of waste that have accumulated over the past
50+ years as a result of this industry. The residents near Yucca
50+ Mountain do
not want the waste in their backyard and as of yet, we don't have a place to put something that takes thousands of years to even have a half-life.

So, we keep shipping it to temporary locations like SRS where it can be made into glass or stored in some other form. But in a temporary format.

1|7J (cont) My big problem with all of this is what in the hell are we leaving for our children and grandchildren? You haven't answered that nor do you have a solution. I realize I am talking about two very different parts of the industry (weapon production and nuclear power), but what about the ongoing issue of disposal for both of these? Where are we going to put hazardous byproducts? Do we really even care about what we leave for the future generations?

Sincerely,

Mark Albertin

1

Alderson, Thomas
Page 1 of 1

Anderson County, Tennessee
Board of Commissioners

PC_1054

RESOLUTION NO. 0208-294

RESOLUTION IN SUPPORT OF THE DEPARTMENT OF ENERGY'S Y-12 NATIONAL SECURITY AND WEAPONS COMPLEX, ITS MISSION TRANSFORMATION, FACILITY MODERNIZATION, ENVIRONMENTAL INITIATIVES AND TO HONOR ITS EMPLOYEES.

1|15A **WHEREAS,** the National Nuclear Security Administration is evaluating options and making plans to transform the Nuclear Weapons Complex and the Y-12 National Security Complex to become more efficient, cost-effective and safer to meet the nation's national security needs for the next century, and

WHEREAS, this effort is vital to supporting the national security objectives of the United States, and

WHEREAS, alternatives for the Y-12 National Security Complex are being evaluated under the Complex Transformation Draft Programmatic Environmental Impact Statement, and

WHEREAS, the Y-12 National Security Complex has been a key component of our nation's nuclear weapons program and recognized as a United States Center of Excellence in uranium and weapons secondary production, and

WHEREAS, the Y-12 National Security Complex is located in Anderson County and the County has been a supportive partner in the vital work that has been accomplished at the complex for over 65 years,

NOW THEREFORE, BE IT RESOLVED by the Anderson County Legislative Body meeting in regular session on this the 18th day of February 2008 that we fully pledge our continued support to the Y-12 National Security Complex and the efforts of the dedicated citizens who are employed at the facility and we further support the transformation of the complex to make it more efficient, responsive, safer and secure.

BE IT FURTHER RESOLVED, that we support the National Nuclear Security Administration's work to modernize the Y-12 National Security Complex, including the completion of the Highly Enriched Uranium Materials Facility and the construction of a new Uranium Processing Facility.

BE IT FURTHER RESOLVED, that we support the National Nuclear Security Administration's Preferred Alternative calling for a Y-12 Uranium Center of Excellence and we applaud the efforts of the citizens employed by Y-12 for assisting the complex achieve this status.

BE IT FURTHER RESOLVED, that we support and encourage the National Nuclear Security Administration and Department of Energy's Environmental Management Program to complete the environmental clean-up needed at the Y-12 National Security Complex.

RESOLVED, duly passed, approved and effective this 18th day of February 2008.

APPROVED: **ATTEST:**

Alexander, Lamar
Page 1 of 1

LAMAR ALEXANDER
TENNESSEE

PC_138

United States Senate
WASHINGTON, DC 20510

February 25, 2008

Mr. Theodore A. Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, D.C. 20585

Dear Mr. Wyka:

1|10I I am writing in support of the recommendation included in the National Nuclear Security Administration's (NNSA) Complex Transformation Supplemental Programmatic Environmental Impact Statement (SPEIS) that the Y-12 National Security facility in Oak Ridge, Tennessee serve as the uranium center of excellence for NNSA.

2|15A The Y-12 facility has played a critical role in our nation's security for over 60 years, and I am confident that with the appropriate investments in infrastructure and facility modernization outlined in the SPEIS the Y-12 facility can continue to meet the challenges we will face in the future.

Our national security has been well served by an actively engaged Y-12 program since WWII, and Y-12 continues to meet NNSA milestones in Stockpile Stewardship, Safeguards and Security, and Nuclear Non-Proliferation today. This record of excellence demonstrates Y-12's capability to be a significant resource to NNSA as it goes through the process of transformation.

I look forward to working with you to successfully implement the Y-12 recommendations in the SPEIS.

Sincerely,

Lamar Alexander

Lamar Alexander
United States Senator

Cc: The Honorable Thomas P. D'Agostino, NNSA Administrator

Allen, Jeffrey
Page 1 of 1

PC_1769

Levens, Matthew

From: Jeffrey Allen [nellaj11@hotmail.com]
Sent: Sunday, March 30, 2008 10:37 PM
To: Complex2030
Subject: Reject "Complex Transformation" plan to build nuclear weapons

Jeffrey Allen
314 West Main Street
Rockville, UT 84763

March 30, 2008

Theodore A Wyka
Complex 2030 SEIS Document Manager
Office of Transformation, U.S. Department of Energy, NA–10.1 1000 Independence Avenue, SW.
Washington, DC 20585

Dear Theodore Wyka:

The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal.

1|9B
2|9H Personally, I am sick and tired of my tax funds going to produce weapons of mass destruction. Why is our money not going toward the benefit of the many, rather than the few!

3|1B Complex Transformation sounds like another hokus-pokus idea that is really not helping the American people progress; rather, Complex Transformation is another jaded idea keeping us all in the stone age, an age of endless war and jockeying for super-power position, while utilizing manipulative tactics based on fear.

4|9A
5|7J I do not support Complex Transformation, and I refuse to allow my money to fund this bogus concept. What are we going to do with all the nuclear waste we've already created? Before you go creating more waste, how about we begin figuring out what to do with the current waste we've produced.

6|16A When I think of Complex Transformation, waste is the word that comes to mind -- a waste of time, money, resources and lives.

7|1J What kind of foreign policy are we projecting with ideas such as this? We tell other countries not to construct nuclear warheads and then we invest billions into the military industrial complex. This has gotten out of hand!

6|16A (cont) Let's get real and move forward, toward a new era of compassion for all that lives. Rather than continuing these archaic tactics of control, let's work to build a true civilization based upon respect for all that lives and breathes.

7|1J (cont) By building up its nuclear arsenal right now, the US is essentially telling the world, "Do as I say, not as I do."

Sincerely,

Jeffrey Allen

1

Alley, Amy
Page 1 of 1

PC_361

Levens, Matthew

From: Amy Alley [10derhart@comcast.net]
Sent: Tuesday, February 26, 2008 7:30 PM
To: Complex2030
Subject: Y-12 National Security Complex

1|10I As a Knoxville resident and a Y-12 employee, I believe the Y-12 site needs to be the Uranium Center of Excellence and continue its job in protecting America.

Amy R. Alley

1

Alley, Charles

Page 1 of 1

PC_1944

Levens, Matthew

From: Chuck Alley [chuckalley@cox.net]
Sent: Monday, April 28, 2008 7:03 PM
To: Complex2030
Cc: chuckalley@yahoo.com
Subject: Request for Publication DOE/EIS-0236-S4

1. Request a hard copy of the following:

SPEIS, DOE/EIS-0236-S4 - Draft Complex Transformation SPEIS) all volumes

2. The following information is provided:

Charles Alley
IDO
1|20 11063 Larkridge Street
Santee, CA 92071

chuckalley@yahoo.com

3. Furthermore, could I be placed on your distribution list so I may receive any future publications.

4. Thank you in advance for your assistance.

Altenberg, Lee

Page 1 of 1

PC_416

Levens, Matthew

From: clientworksets@dynamics.org
Sent: Saturday, April 05, 2008 3:09 PM
To: Complex2030
Subject: Comments Re: Complex Transformation SPEIS

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

These comment are to be included with the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project.

1|16A; 2|8A It is not appropriate for the DOE to be drawing up policy on the creation of new nuclear weapons, but the Complex Transformation project does just this. Any policy regarding something as important as to whether the Complex should be designed to develop new nuclear weapons must come from Congress.

3|1J Clearly, DOE initiated activity toward the development of new nuclear weapons has an impact on the behavior of other world actors, putting pressure on them to continue nuclear arms development themselves. No benefit can come to the United States from this pressure. It can only undermine political efforts at nuclear disarmament and anti-proliferation.

Sincerely,
Lee Altenberg
2605 Lioholo Place
Kihei, HI 96753

cc:
Senator Daniel Inouye
Senator Daniel Akaka
Representative Mazie Hirono

1

Ambre, Jeanne

Page 1 of 1

PC_525

Buenaflor, Justin

From: Jeanne Ambre [jambresscm@hotmail.com]
Sent: Wednesday, March 19, 2008 12:52 PM
To: Complex2030
Subject: my opposition

To: Mr. Theodore Wyka
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington D.C. 20585

1|16A I want you to know that I am opposed to any part of "Complex Transformation" which increases nuclear weapon production capacity, especially the building of a new bomb plant (CMRR). I am in favor of those parts of the plan which call for the consolidation of weapon-grade nuclear materials into fewer locations and reducing the Complex footprint.
2|1J How is it possible to reduce the threat of nuclear warfare by doing just the thing that we accuse other countries of, namely, increasing their nuclear weapon capabilities?

Jeanne Ambre, SS.C.M.
1 Maria Hall Drive
Danville PA 17821

Need to know the score, the latest news, or you need your Hotmail®-get your "fix".
http://www.msnmobilefix.com/Default.aspx

1

Ames, Larry

Page 1 of 1

PC_224

SOC
2393 Heybourne Rd.
Minden, NV 89423
Phone: 775.783.9277
Toll Free: 866.369.9100
Fax: 775.783.9366

March 6, 2008

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
US Department of Energy-NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Wyka,

SOC is honored to provide Protective Force services for the Los Alamos National Laboratory. As noted by our tag line, "Securing Our Country", we are committed to keeping our country strong by providing security services in the most demanding environments.

1|15A We are fully endorse and support the Department of Energy's proposed transformation announced by the National Nuclear Security Administration. We believe the Complex Transformation Plan provides great value to the taxpayer and delivers a robust energy complex responsive to our national priorities.

Los Alamos National Laboratory is a unique national resource and as a major employer of Northern New Mexico. It attracts some of the brightest scientific minds world wide. We pledge our continued support to this vital endeavor. Thank you for the opportunity to comment and to serve our nation.

Sincerely,

Larry Ames
President and CEO

Anderson, Carl
Page 1 of 2

PC_1001

Dear Department of Energy, or to be more accurate, Department of Bombs,

Yesterday I made comments on tritium. I brought written copies. Today I'm going to be covering a different aspect of your plan.

You're calling your plan "**complex transformation**". Is it complex? Is it really a transformation? Today, I will analyze the use of these words to describe your plan.

About "complex." In mathematics, there are "complex numbers." What's a complex number, and how might math help us understand what's in the SPEIS?

To get to complex numbers, let's start with "real number."

Numbers we usually use are "real numbers." Here are some real numbers: 5 (an integer); 2/3 (a fraction of 2 integers); zero; a trillion; -6. The square root of 2 is also a real number. If you take a square, 1 unit on each side, how long is the diagonal? Square root of 2.

But some numbers aren't "real." What's the square root of -1? It's an "imaginary" number. And a "complex" number contains a "real part" and an "imaginary part."

Here's why your plan is "complex." Over the years, and counting the DOD money as well as DOE and systems with both nuclear and non-nuclear warheads, the cost is several trillions. (I mean several trillions literally. Ref:: Stephen I. Schwartz, ed., Atomic Audit: The Costs and Consequences of U.S. Nuclear Weapons Since 1940. Brookings, 1998. This reference gives a total of $5,821 billion, expressed in 1996 dollars, for the period 1940-1996.) The costs of nuclear weapons are real, and so high that the complex won't happen the way you project. 1|9C

Something will break first. Therefore, much of your plan is imaginary, strictly a figment of the imaginations of people who think the bomb business will go on forever.

What will break?

One possibility is that Americans will come to their senses. That would be the best outcome, and it would break the political power of the bombplex within US culture.

Another possibility is that the economy will break seriously. In such a scenario, we'd have to face such choices as caring for Alzheimer's patients OR the bombplex. If continuing the bombplex means tossing Granny out on the street - and it might - the public won't stand for it. As for the economy, look at the price of diesel fuel and the rate of foreclosures now. Look at the inflation that's coming, for instance what will be caused by Federal Reserve's moves to bail out the banks. Look at inflation coming this way: the climate crisis will cause great droughts, causing massive losses in agricultural output. That will be inflationary.

More on the breaking of the economy. 5 years ago, the US government invaded Iraq in pursuit of an imaginary (not real) nuclear weapons program. The war was supposed to be easy and cheap, and its costs would be paid by Iraqi oil. After only a few months, Bush claimed that the mission was accomplished. But neither the cheapness nor the Iraqi nuclear weapons nor the supposed bright future of Iraq were real. They were in the

Livermore, CA

Anderson, Carl
Page 2 of 2

imaginations of Cheney, Bush, Rumsfeld, et al. Now the real costs are becoming more visible - US lives, willingness of other peoples to go along with the US, Iraqi lives, and monetary costs that are half a trillion at least and **accelerating**. And this has nothing to do with economic difficulty? Get real.

There's a third possibility, of course. Suppose some President realizes he's losing a war. Conceding is so unthinkable that instead, he detonates some products of the bombplex. (Maybe only a few percent of the products. In the words of a major Presidential candidate: Ba-ba-ba-bomb-Iran!) That would have consequences so severe that your plans for the bombplex, among other things, will be utterly irrelevant. (**Many** other things, eg our whole civilization.)

So you have a complex bombplex, with elements both real and imaginary. Let's look at "transformation", the other half of your slogan.

What's a transformation? A profound change. For instance, in Romans 12:2, Paul calls on us to "be transformed." Paul doesn't mean conforming to ordinary habits like trying to dominate the world - quite the opposite. Here are some ways the complex could be transformed: the curatorship approach; redefining security. These are discussed by other commenters; they would be transformations. But what's in the SPEIS is rearranging, replacing, and upgrading the bombplex. That's not a profound change. That's not a transformation.

So what's proposed in this SPEIS is a complex bombplex, but transformation is the wrong word . There's a much more accurate word: **continuation**.

Peace,

Carl

Comment on:

Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement (DOE/EIS-0236-S4) (January 8, 2008).

Comment by:

Carl Anderson
439 49th St. #35
Oakland, CA 94609-2156
510/654-4983
cna462@frys.com

March 19, 2008

Anderson, Carl
Page 1 of 2

PC_1002

Dear Department of Energy, or to be more accurate, Department of Bombs,

These comments are on **tritium supply**.

1|5L Your SPEIS spends a lot of time on tritium research and loading tritium into bombs, but almost nothing on tritium production. Among the bomb components, one hears lots about plutonium and highly enriched uranium. They do matter. But as your SPEIS states,

> Tritium, a radioactive isotope of hydrogen, is an essential component ... of every warhead in the current and projected U.S. nuclear weapons stockpile. (page S-53)

Note your word "essential." It seems to be within the obvious scope of your SPEIS, for instance:

> Programmatic alternatives involve the restructuring of facilities that use or store significant ... quantities of special nuclear material .... (page S-2, which goes on to mention plutonium and highly enriched uranium in the next sentence)

2|11C Tritium has 3 key properties: radioactive, essential to bombs (in your opinion), and made in very specific facilities. The only other substances besides tritium with these properties are plutonium and highly enriched uranium. This SPEIS is about producing what goes into bombs, so tritium production ought to be covered at great length. However, the SPEIS denies this:

> The Watts Bar Nuclear Power Plant (Spring City, Tennessee) is a commercial nuclear power plant ... produces tritium.... As a commercial power station, the Watts Bar Plant is not considered part of the nuclear weapons complex. (page S-5)

1|5L (cont) Perhaps in bureaucratic understanding, the Watts Bar plant isn't part of the nuclear weapons complex. But bureaucracies are sometimes unrealistic, and this is one of those times. Watts Bar is currently as essential as tritium to the nuclear bomb business. In a realistic sense (as distinct from bureaucratic organization), when you say Watts Bar isn't part of the nuclear weapons complex, you're wrong. And if tritium isn't a "special nuclear material", that's a matter of bureaucratic definition, rather than the 3 key properties.

Livermore, CA

Anderson, Carl
Page 2 of 2

3|16A In the past, US bombs got their tritium from special reactors, clearly military in purpose, at Savannah River. Those reactors weren't military in the bureaucracy, rather DOE and predecessors; but no one disputed that the reactors' purpose was bombmaking. Now I oppose all forms of nuclear deterrence; but I recognize that if nuclear deterrence is to continue into the indefinite future, so must tritium production. Where does this lead?

4|13A There is an ongoing dispute over the role of civilian nuclear projects between the government of the United States and the government of Iran. Iran enriches uranium. In the view of the Iranian government, this is a civilian project. The United States government claims that the Iranian facility isn't really civilian, but for bombs. There's a real danger of war here.

5|1J The Iranians aren't dumb. Whatever excuse the US may have had in the past for producing essential nuclear weapons material in a "civilian" plant, we have to assume that sometime soon, the Iranians will notice. Why are you handing such a strong argument to the Iranians?

1|5L (cont) Again, I don't favor nuclear deterrence. But for those of you who want it, I can't see why you don't insist on a special tritium production plant that is unambiguously military in purpose. If you try to say that the matter was settled years ago, I would reply that developments of the past few years are **unsettling**.

Peace,

Carl

Comment on:

Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement (DOE/EIS-0236-S4) (January 8, 2008).

Comment by:

Carl Anderson
439 49th St. #35
Oakland, CA 94609-2156
510/654-4983
cna462@frys.com

Comments delivered orally March 18, 2008. Written comments revised 3/19.

Anderson, Clifford

Page 1 of 1

PC_417

Levens, Matthew

From: Clifford Anderson [torvesta@surewest.net]
Sent: Tuesday, March 25, 2008 12:39 AM
To: Complex2030
Subject: Nuclear Weapons

Clifford Anderson
1408 La Sierra Dr.
Sacramento, CA 95864-3035

March 25, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

2|7M I am also opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal.

3|13A.1 Nuclear weapons are not even militarily defensible.

If this country is serious about ending war, they will get out of the business of building new nuclear weapons.

Sincerely,

Clifford Anderson
9164892419

1

Anderson, Glen

Page 1 of 1

PC_1754

Levens, Matthew

From: glen@olywa.net
Sent: Sunday, April 06, 2008 12:37 AM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|15A Yes, the Department of Energy is correct to consolidate and reduce the facilities, workforce, and redundant capabilities within the nation's sprawling nuclear weapons complex.

2|16A BUT NO, Complex Transformation still emphasizes UNNECESSARY capabilities for researching, developing and manufacturing nuclear weapons.

3|3A The US has THOUSANDS of nuclear weapons ready to use and THOUSANDS MORE om storage. WE DON'T NEED THAT MANY. Experts have said that only a few are needed for a reliable and credible nuclear deterrent for the foreseeable future.

2|16A cont. It is CRAZY, WASTEFUL, DANGEROUS, PROVOCATIVE, AND SINFUL to make more nuclear weapons -- or more kinds of nukes.

STOP IT!

4|1F The US is VIOLATING THE NUCLEAR NON-PROLIFERATION TREATY, which requires us to move to disarmament.

Please include my comment as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project. Thank you.

Sincerely,
Glen Anderson
5015 15th Ave SE
Lacey, WA 98503

cc:
Senator Patty Murray
Representative Adam Smith
Senator Maria Cantwell

Anderson, Karen

Page 1 of 1

PC_803

Levens, Matthew

From: Anderson, Karen [AndersK@suterhealth.org]
Sent: Saturday, March 29, 2008 7:39 PM
To: Complex2030
Subject: phone interview?

1|2H Hi Mr. Wyka. My name is Karen Anderson and I am a classmate of Maytal Beshir who spoke with you briefly last week at the Livermore meeting. We are working on an OP-Ed paper for our MPH class at SJSU together.
Would you have about 10 mins for a phone interview so that I might ask you some questions on the Lawrence Livermore Lab? We are trying to get both sides of the story about the proposed changes for the Lab.
If you wouldn't mind emailing me a couple of times for this coming week when you are free to talk, I would very much appreciate it.
Thank you.

Karen Anderson
(W) 415-600-2739

Anderson, Katy

Page 1 of 1

PC_582

Levens, Matthew

From: Katy Anderson [katy.anderson@holyfamilysanjose.org]
Sent: Wednesday, March 12, 2008 5:31 PM
To: Complex2030
Subject: New Nuclear Weapons

Katy Anderson
5486 Cribari Green
San Jose, CA 95135-1321

March 12, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|1J I am very much opposed to any plan to begin producing plutonium or anything that might be used in the construction of new nuclear weapons. I am also opposed to any plan to modify or upgrade existing nuclear facilities which might make it easier for the US to rebuild its nuclear arsenal. In my opinion this would be a very slippery slope upon which to build and would definitely send the wrong message to other nations. If we are truly about assisting and asking other countries to not build nuclear weapons what gives us the right to do just the opposite? We are already perceived as arrogant throughout the world. Do we really want to add that we also have one rule for everyone else and one for ourselves? I sincerely hope not!

Sincerely,

Katy Anderson

1

Anderson, Steve
Page 1 of 1

wed PC_223 march 5 2008

dear mr. wyka,

upon reading a letter by axel meyer (physics professor emeritus. NIU. oak ridge national laboratory 1959 - 1967) published (march 3 2008) in the dekalb chronicle, -- i am writing to express my concern regarding the proposed chemistry and metallurgy research replacement project. (cmrr)

1|3A
2|1J
there are far too many nuclear weapons already. the 'us against them' mindset only creates further insecurity. enough is enough.

3|16A
mr. wyka, i am urging you oppose any planned project.

thank you for your time.

sincerely.
steve anderson
24935 mcqueen rd.
malta, il. 60150

steve.anderson6@gmail.com

Anhalt, Nadia
Page 1 of 1

676 La Ulviega Cb.,
Santa Fe, NM 87501

PC_954 April 3 Cd.

Mr Tael Wyka, NNSA.
Dear Sir,

1|9H
2|9B
I am writing to express my concern that tax payer money is being used to operate 80 jets and facilities at Los Alamos National Laboratory to the sum of around half a billion dollars. This money would be much better spent on education, universal health, poverty issues & alternative energy development.

Los Alamos will not promote peace!

Yours faithfully
Nadia A. Anhalt
Member Pax Christi U.S.A

Anonymous_14, Anonymous

Page 1 of 2

04/02/2008 09:39 8444973 SANDIA LABS PAGE 01

PC_220 Page 1&2

Draft Complex Transformation
Supplemental Programmatic
Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

Written Comment Form

Must be received on or before April 10, 2008.

The flight test alternative IPT risk matrix needs to be reassessed due to NNSA decisions which occurred after risks were assigned to each of the flight test alternatives.

First, because of anticipated drilling at both WSMR & NTS, the risk of conducting penetrating tests at the lakebeds of each of these sites was judged as a relatively low risk endeavor. However, since this detailed geological characterization will no longer be performed prior to the Record of Decision the risk assessment will naturally be higher because of this geological uncertainty.

1|6C

Secondly, it was assumed that demonstration flight tests would be performed at both of these sites. No flight tests at alternative sites have been conducted nor will be conducted in FY08 - that test activity was cancelled by NNSA. High altitude aircraft & released bomb tracking requires skilled personnel to maintain manual

Please use other side if more space is needed.

Comment forms may be mailed to:
Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Comment forms may be faxed to:
(703) 931-9222
or sent by electronic mail to:
complextransformation@nnsa.doe.gov

You may also submit comments through the project website which can be found at:
http://www.complextransformationspeis.com

Anonymous_14, Anonymous

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04/02/2008 09:39 8444973 SANDIA LABS PAGE 02

Page 2&2

Draft Complex Transformation
Supplemental Programmatic
Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

Written Comment Form

Must be received on or before April 10, 2008.

track of the unit, especially during dynamic events, such as parachute deployment. In addition, capture of telemetry signal at ground impact requires experienced personnel & carefully placed redundant equipment to ensure data capture during this critical period.

1|6C (cont.)

The combined increased risk due to no demonstration test & no detailed geological characterization prior to the Record of Decision will result in ~~increased~~ increasing the risk of choosing either of the options, perhaps to an extent that would strongly suggest that operation at TTR be continued indefinitely. Because no demonstration test will be performed prior to the Record of Decision, the risk of conducting flight tests at both of these sites will be higher than the risk currently assigned to these alternatives.

The IPT team should re-examine mission risk to ensure the proper "preferred alternative" is chosen.

Please use other side if more space is needed.

Comment forms may be mailed to:
Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Comment forms may be faxed to:
(703) 931-9222
or sent by electronic mail to:
complextransformation@nnsa.doe.gov

You may also submit comments through the project website which can be found at:
http://www.complextransformationspeis.com

Anonymous_17, Anonymous

Page 1 of 1

PC_1820

Levens, Matthew

From: Ml888888@aol.com
Sent: Wednesday, March 26, 2008 4:52 PM
To: Complex2030
Subject: DO NOT BUILD ANOTHER NUCLEAR MISSLE PLANT.

1|16A Please value our lives and those of our children and grandhildren.

DO NOT build another plant and destroy what you have.

**********Create a Home Theater Like the Pros. Watch the video on AOL Home.
(http://home.aol.com/diy/home-improvement-eric-stromer?video=15?ncid=aolhom00030000000001)

1

Anonymous_18, Anonymous

Page 1 of 1

PC_1825

Levens, Matthew

From: Old World Studio [bast@laplaza.org]
Sent: Friday, April 04, 2008 7:19 PM
To: Complex2030
Subject: Plutonium Pits at Los Alamos

1|14M3 This is a letter to express our vehement opposition to the proposed increase in plutonium pit production at Los Alamos Labs in New Mexico. We do not need more nuclear bombs. We are already dealing with elevated levels of strontium-90m celsium -137 and plutonium in our lakes, elevated levels of percholorate, radioactive isotopes and other toxins in our water and food grown in our communities near Los Alamos. We do not want more plutonium pit production at all and want you to scale back and stop current pit production. Thank you.

1

Anonymous_26, Anonymous

Page 1 of 2

PC_1982

Levens, Matthew

From: GD Support [gdsupp@mail.llnl.gov]
Sent: Thursday, April 10, 2008 10:19 PM
To: Complex2030
Subject: comments on complextransformation

Dear Sir(s) or Madam(s),

1|15A
It is clear that the government in general and the DOE in particular are in a mode where paper cost reduction is the most important thing on administrators mind. There is very little thought being devoted to the capabilities and technologies that are needed and worth preserving. As a 15 year employee of LLNL I have watched the lab's transformation from a national resource of unparalleled technical capability and technological abilities to a cost conscious, safety and security paralyzed institution without any sense of mission or indeed almost any sense of purpose. This is largely the fault of the federal government and the DOE who appear to have lost sight of the purpose of the national labs and the weapon's complex in particular. The national labs and the people within them are resources. The facilities and staff are not available elsewhere to rent or hire temporarily. Nuclear technology training and SNM material handling and processing are not taught or learned elsewhere but rather only within the complex and with the facilities that are supported only within the complex. The facilities that are closed and the staff that is lost is not replaceable elsewhere and represents capability lost forever.

Scientist and Engineers are trained and kept world class by doing not by thinking about doing. The act of building, operating and analyzing experiments and technical projects are what trains and hones the skills of a technical staff. Cumulative experience in these specialized technical areas is what leads to breakthroughs and new frontiers. The loss of facilities, the constant time lost in seeking and answering for funding, the time lost documenting and re-documenting safety, security and expenditures all represent the loss of most of the operating time of even the most junior technical staff members and certainly represent most of the time of the senior staff members whose time could be most valuably spent on solving technical problems. The DOE has administrated its technical staff out of being able to learn and ultimately to do its primary work.

2|19A
The labs have become bloated with expensive overhead which is mostly due to staff increases, not in the staff fulfilling the laboratory's mission(s) but rather to fulfill DOE imposed documentation for safety and security basis (oversight and compliance). Vast amount of overhead is staff soley committed to answering the constant auditing and oversight. The other massive cost of overhead is in obtaining funding for the laboratories through courting the individual program managers from various programs and offices within the DOE, DoD, DHS and other federal offices. A whole expensive non-working-on-technical-problem middle management has been set up to obtain and answer for funding. Without a reduction in requirements and compliance documentation or funding methods there is no possibility of true cost reduction.

1|15A (cont.)
The loss of facilities and access to materials the loss of the ability to experiment and build things freely all represent massive loss of capability and technical expertise. The loss of senior technical staff that was trained working in a different time represents a permanent loss of knowledge and abilities. New staff can not obtain these capabilities for the simple fact that they can not spend as much time over a career learning and gaining experience. Consolidating facilities reduces efficiency for the staff because they don't have easy access to such facilities for work.

1

Anonymous_26, Anonymous

Page 2 of 2

PC_1982

1|15A (cont.) ; 3| 18A
The staff that has remained has borne the brunt of the debilitating oversight and compliance issues which has manifested itself as enforced loss of productivity. The current cost cutting which is taking away invaluable and irreplaceable facilities and capabilities and the loss of benefits, layoffs and trusted contractors appears to be a deliberate war waged against the staff who have dedicated their lives and technical careers to serving the public by enriching the public scientific knowledge base and by offering technical solutions to the nation's problems. Instead of being viewed as a true National Resource valued by the current administrators we seem to be seen simply as unnecessary costs to be minimized.

When I was growing up in the 60's and the 70's , employment at the national laboratories was seen as the employment opportunity of choice for scientists and engineers with unparalleled facilities, resources, and the most exciting and cutting edge research. The possibilities were limitless and with good wages, great benefits and job security a technical staff member could concentrate on solving technical problems and not worry about having a meaningful, worthwhile, and fulfilling career. Now many of those pluses that were a given for working at a national laboratory are gone. Carelessly tossed aside, discarded and justified by cost savings. The damage done to the morale of the staff of the national laboratories is immeasurable and in the decades to come when the technical solutions are no longer coming from the national laboratories, when they become simply another government job shopping institutions working for the profit of the contractors, the public will wonder why the current custodians of these national treasures were so short sighted and dismantled the system that served the nation so well for over 60 years and propelled the nation to world prominence.

A concerned (formerly government) scientist.

2

Anonymous_Pc_973, Anonymous

Page 1 of 1

TAOS PUEBLO

Parts of Taos were occupied when Hernando Alvarado visited here in 1540. Taos served as the headquarters from which [illegible] Pueblo, organized the Pueblo Revolt in 1680. In 1846 the pueblo was a refuge for Hispanics and Indians resisting the annexation of New Mexico by the United States. This is the most visited pueblo in America.

Photo: © D.B. Friedrichs

PC_973

1|16A

Dear Mr. Wyka,
We DON'T WANT
more nuclear weapons
here in New Mexico.
We are scared.

Mr. Theodore Wyka
Complex Transformation NA-10.1
U.S Department of Energy/NNSA
1000 Independence Ave. S.W.
Washington, DC 20585

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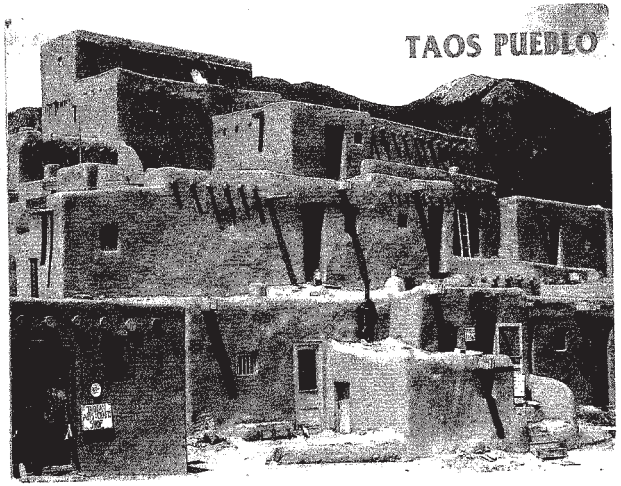

Anonymous_Pc_974, Anonymous

Page 1 of 1

WHEELER PEAK
Northern New Mexico

The highest peak in New Mexico – 13,161 feet – as seen from the Red River Pass.

Photo: © Kerrick James

PC_974

1|14N

I live in Northern New Mexico,
I am up wind from Los Alamos.
From what I understand Plutonium Pit Production is very unstable & flamable. A major fire could send smoke & toxic waste all over our state.

2|16A

I am against C-T SPEIS.

3|7J

I would rather see Los Alamos cleaned up of toxic waste & the facilities used to help us become Energy Independent.

Mr. Theodore Wyka.
CT SPEIS Document Manager
Office of Transformation, NA-10.1
US Department of Energy/NNSA
1000 Independence Ave. S.W.
Washington, DC 20585

RECEIVED
MAY - 5 2008

Anonymous_Pc_975, Anonymous

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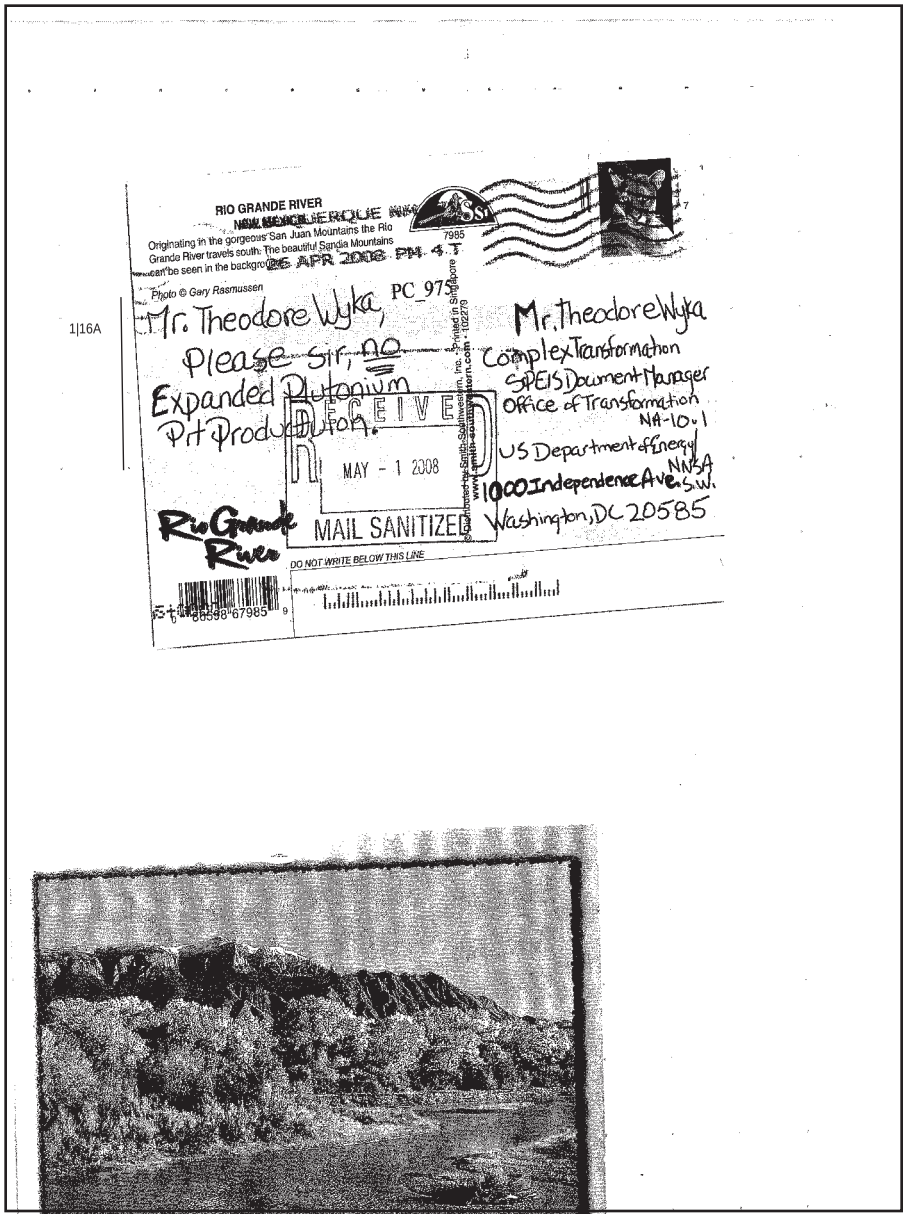

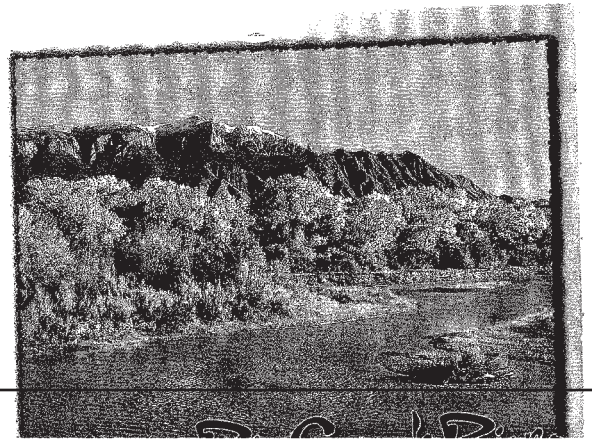

Ansevin, Allen

Page 1 of 1

PC_1273

Levens, Matthew

From: Allen Ansevin [akansevin@aol.com]
Sent: Tuesday, February 19, 2008 11:15 PM
To: Complex2030
Subject: Nuclear Weapon Expansion

Allen Ansevin
2127 Mac Arthur St.
Houston, TX 77030-2103

February 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons. Neither we nor the world needs even more nuclear weapons. We
2|3A already have more than enough, and starting new production is a type of militarization
3|1J that restarts competition among nations who already posess weapons and encourages others to proceed with the creation of nuclear weapons.

Sincerely,

Allen Ansevin
713-666-5280

Anthony, Kate

Page 1 of 1

PC_470

Buenaflor, Justin

From: F. Kate Anthony [rainbow17gardener@yahoo.com]
Sent: Saturday, February 23, 2008 9:33 AM
To: Complex2030
Subject: nuclear weapons

F. Kate Anthony
4024 Paddock Rd
Cincinnati, OH 45229-1609

February 23, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|1J I have been told the current administration is proposing restarting the US's nuclear weapons programs. I am writing to oppose this in the strongest possible terms. I think this would be a disaster. How can we claim to support nuclear non-proliferation, while we continue to proliferate our own weapons. We are continually acting to place the world in more danger and undermine our ability to restrain other countries such as Iran and Korea who seek nuclear weapons.

2|14M.3 Further more I live near what used to be the Fernald uranium enrichment plant and I know first had that every nuclear weapons plant this country has ever had (ie Piketown and Oakridge) has been an environmental catastrophe, leaving behind tons of uncontained chemical and radioactive waste, which is continuing to cost lives through dramatically increased rates of various rare cancers, birth defects, etc.

3|16A Congress rebuked the Energy Department's last attempts to upgrade the arsenal by defunding the Reliable Replacement Warhead and last year's proposed mega-scale bomb plant. The CMRR project is another irresponsible new program that should be rejected.

This plan spends billions of dollars and what it accomplishes is to put the American people and environment at greatly increased risk. I implore you to oppose it!!!

Sincerely,

F. Kate Anthony, Psy.D.

1

Apicella, Joseph

Page 1 of 1

PC_1398

Levens, Matthew

From: Jopseph Apicella [joseph_apicela@yahoo.com]
Sent: Tuesday, April 15, 2008 4:11 PM
To: Complex2030
Subject: No More Nuclear Weapons

Jopseph Apicella
276 Walnut Street
Nutley, NJ 07110-1822

April 15, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

2|1J Building this new plant would send a contradictory message to other countries, such as Iran, who may be seeking nuclear weapons. While the U.S. is asking others to forego developing nuclear arsenals, we are simultaneously trying to increase our own capacity to build new nuclear weapons.

Why is our government not speaking to Iran? Is it because they must agree to not make a nuclear bomb before we will negotiate with them about not making a nuclear bomb? Come on.

Best regards,

Joseph A. Apicella

Sincerely,

Joseph A. Apicella
973-667-3853

Apsey, Carolyn
Page 1 of 1

PC_1318

Levens, Matthew

From: Dan [Dan@mistbc.org]
Sent: Sunday, April 27, 2008 8:57 PM
To: Complex2030
Subject: Fwd: ?Where do I mail this?

Begin forwarded message:

> From: Carolyn Apsey <carolynapsey@comcast.net>
> Date: February 25, 2008 4:05:00 PM EST
> To: Dan@mistbc.org
> Subject: ?Where do I mail this?
>
1|16A > *A future without nuclear weapons is my plan.*
>
> * *
>
> *1.nuclear waste has no safe disposal.*
>
2| 14M.3 > *2. It's polluting the planet and the universe.*
>
> *3. creating enemies for my children and grand children.*
>
> *4. DU use is immoral, illegal and it gives illness to whoever comes
> in contact, like kids, farmers, pregnant *
>
> *5. Radiation sickness causes, the mucous membrane to shred, nausea,
> vomiting and diarrhea *
>
> *6. the thyroid gland bone marrow attracts radiation and stores it
> producing cancer later if you survive the initial exposure.*
>
> * *
>
> *I support the STOP THE BOMBS CAMPAIGN, of OREPA,*
>
> *Oak Ridge Environmental Peace **Alliance**,***
>
> * *
>
1|16A (cont) > * Please discontinue the revamping of nuclear bombs.*
>
> * *
>
> *Carolyn Apsey*
>

1

Arends, Joni
Page 1 of 19

PC_371

April 30, 2008

By email: complextransformation@nnsa.doe.gov

Ted Wyka, NA-10.1
U.S. Dept. of Energy, NNSA
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka

1|70 2|2A1 The draft SPEIS is unacceptable and must be revised to include an alternative for nuclear weapons disarmament. The Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement (draft SPEIS) is not responsive to the concerns from the public for the preceding scoping report as illustrated by the statements pasted below from page 1-21 of the draft SPEIS:

3|1F "*Comment:* The majority of the comments expressed opposition to the nuclear weapons program and U.S. National Security policies. Many of the comments stated that the U.S. is violating the Nuclear Non-Proliferation Treaty (NPT). Many of the comments stated that NNSA should assess an additional alternative - disarmament in compliance with the NPT - and not design or build new nuclear weapons."

3|1F (cont) In fact, during the initial "scoping" process, 33,000 members of the public wrote and 90% of those spoke about the need to base the nuclear weapons complex of the future on the Nuclear Non-Proliferation Treaty (NPT). The failure of the draft SPEIS to present an alternative for nuclear weapons disarmament requires retraction and revision of the document. The NPT is U.S. and international law. The DOE must issue a new draft SPEIS that is fully aligned with the NPT and, in particular, the Treaty's Article VI obligation to disarmament.

4|1C The DOE's "Complex Transformation" plan invokes the Bush Administration's 2001 nuclear posture review as its mandate. Yet, last year Congress voted to require the next U.S. President to produce a new nuclear posture review. The new, revised draft SPEIS must not be written until the new Administration produces the new nuclear posture review.

Furthermore, Senator Feinstein has introduced a bill (S1914) that contains provisions for obtaining broad-based input with the goal of reconsidering the nation's nuclear policy as well as its nuclear posture review.

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4|1C (cont)

In addition, a more narrow, but still significant, bill put forward by Representative Ellen Tauscher has already passed and became law. It establishes a bipartisan panel to analyze and provide recommendations on U.S. nuclear weapons policy. That panel has been chosen and its recommendations are due December 1, 2008 to Congress.

The DOE must produce a new draft SPEIS document that incorporates the:
1). new nuclear posture review by the next president,
2). outcome of Senator Feinstein's bill S1914, and
3). recommendations from the bipartisan panel formed by the passage of the bill put forward by Representative Tauscher.

5|3A

The United States now faces an Energy Crisis! In its fiscal year 2009 budget request to Congress, the Department of Energy (DOE) requested more money for nuclear weapons than for "science" and "energy" combined. According to the U.S. Government Accountability Office, the DOE's "Bombplex" scheme will cost at least $150 billion over the next 20 years. The United States cannot afford the "Bombplex Boondoggle!"

6|9B1

This drain on our national economy and on our scientific and engineering talent must stop. It is irresponsible of the DOE to pursue a new program to design and manufacture "state of the art" nuclear weapons with the United States facing both an energy emergency and a fiscal spending emergency. The price of a barrel of crude oil is now above $110.00 and predicted to become much more expensive - perhaps above $200.00 per barrel.

The economy of the United States is being devastated by the runaway costs of energy and the military mission in Iraq. The DOE "Complex Transformation" must be to change the DOE mission from "*new nuclear weapons for national security*" to research and development across the spectrum of energy resources and especially renewable energy resources, which will provide real national security.

7|8B1

National Nuclear Security Administration. The very title of this DOE semi-autonomous agency is proof that the mission is wrong and the NNSA must be incorporated back into DOE. The pursuit of new "reliable replacement warheads" will only lead to a new arms race that the United States cannot afford. The "Complex Transformation" plan must become a blueprint for nuclear weapons disarmament, not new "state of the art" nuclear weapons.

New Nuclear Weapons Plants - A Real Danger to National Security. The plan to transform Los Alamos National Laboratory (LANL) into a plutonium pit factory

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8|5H1

is a mistake. Instead, LANL must be transformed into a new center of excellence across the spectrum of non-proliferation, basic science and cleanup, restoration and remediation technologies. A new mission in nuclear weapons will only serve as a "trigger" to a new Arms Race. Our foreign policy position that nations like Iran cannot develop nuclear weapons is "two-faced" if we do not show all nations that we are devoted to global nuclear weapons disarmament.

Current Manufacturing of Plutonium Pits at LANL Must Stop NOW! The present manufacturing of plutonium pits on a schedule of 20 pits per year in old, seismically unsafe buildings at LANL must stop immediately because of the danger to public health and the environment, and the exorbitantly high cost. Last July, the first plutonium pit cost $1 billion to manufacture. There is no use for new plutonium pits for a mission of nuclear weapons disarmament. New pits are not needed to maintain the nuclear weapons stockpile.

9|14.K.13

The draft SPEIS states on page 2 -13 that "Current surveillance data in enduring stockpile weapons indicate that they are holding up well with age." An independent study by the JASONS concluded that production of new pits is not necessary over the time required to accomplish the mission of nuclear weapons disarmament.

The Old CMR facility is not safe. The October 23, 2007 letter from the Defense Nuclear Facilities Safety Board (DNFSB) described the immediate need to stop pit production at LANL because of the safety problems with the Old CMR Building. Excerpts from the DNFSB letter are pasted below:

> "The National Nuclear Security Administration's (NNSA) current plan for sustained manufacturing of plutonium pits, essential to national security, relies on continued operation of the 55-year-old Chemistry and Metallurgy Research (CMR) facility at Los Alamos National Laboratory (LANL). The Defense Nuclear Facilities Safety Board (Board) believes that continued operation of the CMR facility in its current condition poses significant risks to workers and the public."
>
> "The CMR facility is known to have serious vulnerabilities, such as the lack of robust building confinement to prevent a release of radioactivity during an accident."
>
> "This decision to abandon a complete facility upgrade was due primarily to the identification of a seismic fault under two wings and the susceptibility of all the wings to structural collapse due to ground motion from a 500-year return period earthquake."

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> "It was envisioned that the CMR Replacement Project would be completed by 2010; however, the Replacement Project has experienced significant delays, is now nominally projected for completion in 2016, and faces continued susceptibility to year-to-year budgetary uncertainty. Consequently, the CMR facility will likely be required to support pit production activities to 2016 and beyond."

The draft SPEIS does not accurately present the reader with the immediate need to stop pit production at LANL because of the safety issues with the Old CMR Building. Instead, the draft SPEIS describes the ongoing manufacturing at the unsafe LANL facility on page 2-15:

9|14.K.13 (cont)

> "There are operational safety issues at some existing facilities that use Category I/II SNM that call into question their viability for use beyond the next five to ten years. One is the Chemistry and Metallurgy Research Facility at LANL."

The draft SPEIS does not inform the reader of the serious safety problems at the LANL CMR Building and that DOE/NNSA is demonstrating careless disregard for public health and safety with continued use of the 55-year old facility. In a separate e-mail, Gilkeson is sending you the DNFSB letter of October 23, 2007. Please incorporate the letter into the revised draft SPEIS, which must be submitted to the public for review and comment.

In fact, the draft SPEIS does not recognize the danger an accident at the Old CMR Facility poses to worker and public safety.

Given the concern of the DNFSB for the poor safety of the Old CMR Facility, and the location of the facility close to high populations of non-involved workers, the danger of the Old CMR Facility to worker and public safety from an earthquake or accident must be fully described in the revised draft SPEIS.

The revised draft SPEIS must present the poor safety for continued manufacture of pits at LANL and an alternative for no pit production at LANL or anywhere else in the DOE Complex. The poor safety for pit production at LANL is not only the decrepit Old CMR Facility, but also the great uncertainty for the seismic hazard at LANL. The safety analysis must include the finding in the 2007 LANL Probabilistic Seismic Hazard Report that the seismic hazards at LANL are significantly higher than previously believed: e.g., roughly 50% increase in PC-3 seismic criteria. The assessment of public and worker safety for all of the LANL facilities needs a new assessment to incorporate the increase in seismic hazard.

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Uncertain Seismic Hazard at LANL. The draft SPEIS describes the 2007 LANL seismic report - "*FINAL REPORT - Update of the Probabilistic Seismic Hazard Analysis and Development of Seismic Design Ground Motions at the Los Alamos National Laboratory*" (URS Corporation, May 25, 2007) - as "a comprehensive update: the analysis presents estimated ground-shaking hazards and the ground motions that may result" (p. 4-29).

However, the draft SPEIS fails to describe that the 2007 report presents findings that the seismic hazards are significantly higher than previously believed (roughly 50% increase in PC-3 seismic criteria) and that the 2007 report identified a great uncertainty in the seismic hazard at LANL because of inadequate field studies for mapping faults and for measurements of basic seismic properties.

10|14.F.1 (cont)

A very important issue that the draft SPEIS did not bring attention to is that the 2007 seismic hazard report presented the following recommendations to improve the knowledge of the seismic hazard at LANL:

1. Recalculate the seismic hazard using the newly developed NGA ground motion attenuation relationships. The new relationships display significant differences with the ones used in the LANL report.

2. Conduct additional detailed/high-precision mapping and displacement measurements along the Santa Clara Canyon (SCC) segment of the Pajarito Fault System (PFS). A purpose for this mapping is to better define long-term displacements and slip rates for the SCC.

3. Conduct paleoseismic trenching studies of the SCC to determine the timing and size of prehistoric surface-faulting earthquakes. This may help determine maximum magnitudes and recurrence intervals for rupture scenarios.

4. Reevaluate the entire dataset for the Rio Grande Rift fault slip rate analysis using only data for complete seismic cycles and more complete documentation of long-term data (both displacements and applicable time periods). This more robust analysis will likely reduce slip rate uncertainties and result in a more symmetric RGR slip rate distribution.

5. Conduct V_s (velocity) measurements of dacite - the reference rock. There are no reliable velocity data for the dacite. Thus the acquired velocity data would confirm the (assumed) value used in this report.

6. Conduct additional studies to better constrain kappa. Kappa is a key parameter in assessing the hazard at LANL. Focused efforts should be made to evaluate kappa using data from the LANL seismographic network.

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Improvements in the network may be necessary to improve data quality [emphasis supplied].

9|14.K.13 (cont)

The large number of the recommendations and the importance of the recommendations for gaining the required knowledge of the LANL seismic hazard show that it was a mistake for the draft SPEIS to describe the 2007 seismic hazard report as "a comprehensive update." Instead, the 2007 report is a work in progress with many deficiencies.

The list of recommendations show that DOE managers and LANL scientists have been irresponsible over the last twenty years in meeting the industry standard for assessment of seismic hazards and the required practices for building design and construction and routine laboratory operations to protect the safety of workers and the public.

The failure to acquire the needed data to accurately calculate the seismic hazard is illustrated by the poor knowledge of the fundamental property "kappa." Kappa is determined by establishing a reliable network of seismographs and collection of reliable data over a period of many years. The recommendation for improvements in the seismic network and improvements in the data quality is evidence of careless work. Similarly, pointing out the need for additional field study to map faults and measure the velocity of dacite are examples of careless attention to acquire required data by DOE and LANL.

Dacite is not the "reference rock" below much of LANL. Another deficiency that was not presented in the list of recommendations is that the authors of the 2007 report failed to realize that dacite has limited presence beneath LANL. Further, the geologic information shows that the dacite will possess a great range in velocity values. The 2007 report calculated the seismic hazard for every facility based on an assumption that dacite was the reference rock every where and that the dacite only had one value for seismic velocity.

However, the geologic knowledge from the 10-year drilling project to install characterization wells is proof that dacite is only present in the northwestern region of the LANL site and that the velocity values in the dacite vary greatly. Calculating an accurate value for the seismic hazard at any LANL facility will require deep drilling to characterize the velocity values of the reference rock.

This letter includes four cross-sections from the final report for the LANL characterization well project (Figures 2-12, 2-13, 2-14, and 2-17) to illustrate the limited presence of dacite below LANL and the complex geology below LANL which results in a need to characterize the unique properties of the reference rock at each facility where there is a need to calculate the seismic hazard.

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The failure of DOE/LANL to install a reliable network of monitoring wells at the LANL site. DOE/LANL installed a very large and expensive network of characterization wells at LANL during the past ten years as an activity of the LANL Hydrogeologic Workplan Project. The wells were intended to meet the requirements of the Resource Conservation and Recovery Act (RCRA), the Department of Energy (DOE) Orders and the New Mexico Environment Department (NMED) Consent Order as monitoring wells for the detection of the LANL contaminants, but practically all of the wells fail to be usable for that purpose.

11|14.E.10

There are many factors that prevent the characterization wells from producing water samples that are reliable and representative for the detection of groundwater contamination from the past, present or future LANL operations in research and manufacture of nuclear weapons. Some of the factors are summarized below:

- 1). The wells are not installed at important locations.
- 2). The wells are installed too far away from the LANL legacy waste dumpsites.
- 3). The well screens are installed in geologic formations with low permeability where groundwater contamination is not likely to be present.
- 4). The screens are not installed in the aquifer zones where groundwater contamination is most likely to be present.
- 5). Many screens provide dilution and masking of groundwater contamination because they are too long.
- 6). A LANL report published in 2007 shows that no-purge sampling methods are used to collect samples of stagnant groundwater from 54 of the 80 screened intervals in the network of LANL characterization wells.
- 7). The chemical properties of the pristine and corroded stainless steel screens will prevent the detection of many LANL trace metal and radionuclide contaminants.
- 8). The chemical properties of the new mineralogy produced in the screened intervals by the organic drilling fluids and bentonite clay muds will prevent the detection of many LANL contaminants of concern, including the trace metal radionuclides.
- 9). The water quality data from the old LANL "test wells" have never been reliable for the detection of contamination because of the:
    a). chemical properties of the corroded iron screens,
    b). dilution of contamination by the very long screens,
    c). invasion of the screens with drilling muds, and
    d). wells were not at appropriate locations.

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The old test wells are still used as the primary monitoring wells for the detection of contamination from a highly contaminated experimental area where a very large inventory of plutonium wastes are buried in unlined shafts, such as TA-49.

Over the past five years, reports have been written by the Inspector General (IG) of the DOE, the EPA Kerr Research Laboratory, and the National Academy of Sciences (NAS) that describe the failure of DOE/LANL to install a reliable network of monitoring wells at LANL. Excerpts from the reports are presented in this letter. Copies of the reports are being submitted to you in separate emails.

Report by the DOE Inspector General

11|14.E.10 (cont)

– In September 2005, the DOE IG published a report titled "*Characterization Wells at Los Alamos National Laboratory*" Report DOE/IG-0703. Pertinent excerpts from the report are pasted below:

> "Muds and other drilling fluids that remained in certain wells after construction created a chemical environment that could mask the presence of radionuclide contamination and compromise the reliability of groundwater contamination data" (p.2).

– The DOE IG Report described the requirement of DOE Order 450.1 for a site-wide network of reliable monitoring wells at the Los Alamos National Laboratory by December 31, 2005:

> "The current requirements for a groundwater surveillance monitoring program are found in DOE Order 450.1, "Environmental Protection Program," which LANL has until December 31, 2005, to implement. As LANL works to meet this deadline, we believe that the Laboratory should, as the Hydrogeologic Workplan [characterization] wells are converted to monitoring wells, ensure that monitoring data are reliable. We also believe that particular attention should be given to well development and purging methods, the quality of radionuclide data, and any qualifications on that data" (p.2).

The network of monitoring wells sitewide at LANL and at MDA G are <u>not</u> in compliance with either RCRA or DOE Order 450.1. This was the finding presented in the 2007 Final Report of the NAS titled - "Plans and Practices for Groundwater Protection at the Los Alamos National Laboratory." Findings in the NAS Final Report are pasted below:

> – "Many if not all of the wells drilled into the regional aquifer under the [LANL] Hydrogeologic Workplan appear to be compromised in their

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> ability to produce water samples that are representative of ambient groundwater for the purpose of monitoring." (p.49)
>
> – "During this study the committee was presented a good deal of information indicating that <u>most or all wells into the regional aquifer at LANL (R-wells) are flawed for the purpose of monitoring</u>. The committee did not disagree, but rather found a <u>lack of basic scientific knowledge</u> that could help ensure future success. Evidence about the conditions prevalent around the screens in the compromised wells is indirect—relying on plausible but unproven chemical interactions, general literature data, analyses of surrogates, <u>and apparent trends in sampling data that may not be statistically valid</u> [emphasis added]." (p.60)

11|14.E.10 (cont)

> – " LANL should design and install new monitoring wells with the following attributes:
> • A borehole drilled through the monitoring zone without the introduction of drilling muds or additives (i.e., use air or water),
> • One screened interval that targets a single saturated zone, and
> • A carefully planned design (length and depth) of the well screen, which is confirmed with information collected in the drilling process." (p.61)

First EPA Report

- **Findings in the February 2006 EPA report on the deficiencies in the LANL well construction practices.**

– <u>The EPA report described the great difficulty and uncertainty in attempts to rehabilitate the LANL characterization wells</u>:

> "With respect to screens where bentonite-based additives were used, it is possible that even trace amounts of residual bentonite [clay] that remain following development may render ground-water samples non-representative for highly sorbing constituents. This situation would be difficult to accurately characterize. <u>Therefore, the quality of samples for constituents such as isotopes of americium, cerium, plutonium, and radium obtained from these screens will likely remain uncertain even after re-development</u> [emphasis added]." (p.7)

– <u>The EPA report described the special properties of the drilling additives to prevent the detection of the LANL contaminants</u>:

> "In particular, the constituents of concern that may be most affected by the residual drilling additives are certain radionuclides (*e.g.*, isotopes of

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americium, cerium, plutonium, radium, strontium, uranium), many stable metal cations, and organic compounds that may be degraded in the impacted environment near the well screen." (p.15)

"Predictions of the time frames for the impacted intervals to return to natural conditions are uncertain. It is also likely that the inability to fully remove the additives which were used during drilling has reduced the hydraulic conductivity of many of the impacted screened zones." (p. 15)

- The reduction of the hydraulic conductivity has created a zone of "stagnant water" that is in contact for a long period of time with the new chemistry formed by the drilling additives. The stagnant water is not representative of the *in situ* formation water but is sampled for the expensive analytical suite to investigate contamination.

11|14.E.10 (cont)

– The EPA report described the need to use drilling methods that prevent the invasion of drilling additives into the screened intervals:

"Strive to drill boreholes using no bentonite [clay] or organic additives within screened intervals [emphasis added]." (p.15)

- After this caution from EPA, NMED continued to approve the DOE/LANL drilling plans for using drilling methods that would invade the screened intervals in the LANL characterization wells with organic foam, organic fluids, and bentonite clay drilling muds.

– The EPA report described the inability of the LANL *Well Screen Analysis Reports* to identify that the LANL characterization wells produce valid water quality data for the detection of the LANL contamination:

"Relative to addressing the question of whether groundwater samples are representative of the undisturbed aquifer chemistry, water quality data alone provide an unreliable indication of whether there is sustained impact to sediment sorption characteristics." (p. 4)

- Despite this finding by the EPA and the NAS, the most recent version of the LANL *Well Screen Analysis Report – Revision 2* (WSAR-2) is still only a study of water quality data. Unfortunately, the NMED has made the mistake of approving the invalid assessments presented in the WSAR-2.

– The EPA report described the need to replace many of the LANL characterization wells:

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"Based on the uncertainty in characterizing the condition of aquifer materials adjacent to the well screens and the potentially long time frames that some impacts may last, installation of replacement wells at critical locations should also be considered." (p. 16)

"At locations determined to be critical to the detection monitoring program, consider replacement of wells that were drilled using bentonite or that exhibit impacts due to organic additives with wells installed without additives in the screened zones." (p.15)

"Other issues affecting whether samples from the hydrogeologic characterization wells are representative of aquifer conditions include the design and construction of these wells. Many of the wells, particularly those constructed at the top of the regional aquifer, use screens as long as approximately 60 ft. This type of construction can result in significant dilution of any contaminants that may be present." (p.12)

11|14.E.10 (cont)

Second EPA Report

- **Findings in the EPA review of the scheme used by the LANL scientists in the assessment published in the *Well Screen Analysis Reports [WSAR]*. The EPA findings were published in February 2006.**

– The EPA scientists find that the scheme used in the LANL *Well Screen Analysis Reports* is not scientifically valid:

"In general, the criteria used [in the LANL *Well Screen Analysis Report*] to evaluate the representativeness of ground-water samples from well screens installed under the hydrogeologic characterization program still fail [emphasis added] to consider impacts that may be present following biodegradation of residual organic drilling additives and the return of oxidizing conditions." (p.1)

- The EPA scientists reviewed the LANL draft WSAR report and advised the LANL scientists of the many deficiencies in the LANL scheme to assess the impacts of muds and organic drilling additives to no avail in the LANL published report. It is important to note that the LANL WSAR Reports do not acknowledge the EPA review of the scientifically flawed LANL scheme.

– The EPA scientists find poor knowledge of background groundwater chemistry across the LANL site:

"The LANL criteria [in the WSAR reports] rely heavily on comparisons between data obtained from the potentially impacted well screens and data

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obtained from the Groundwater Background Investigation Report (LANL, 2005). The data used to characterize background conditions appear to be sparse, derived from sources representing mixtures of water that are significantly different from the samples obtained from the hydrogeologic characterization wells, and are representative of significantly different flow paths within the aquifer. Actual background values at the locations of the individual characterization well screens may be significantly different from the proposed values. Therefore, the strong reliance on these uncertain background conditions for the evaluation of the impacts of residual drilling additives increases the uncertainty in these assessments [emphasis added]." (p.3).

11|14.E.10 (cont)

- NMED has approved the LANL Background Investigation Report without correction of the deficiencies identified by the EPA.

– The EPA scientists find that the LANL WSAR reports have failed to examine trends in the water quality data. The study of trends is the standard industry practice of geochemists:

"The well screen assessment [in the WSAR reports] only utilizes data from the most recent sampling rounds. Examination of trends [from the first to the most recent water samples] provides another line of evidence regarding the condition of impacted well screens and should be formally included in these evaluations." (p.3)

- The most recent LANL WSAR-2 report still fails to examine the important trends from the first to the most recent samples.
-

– The EPA scientists describe the need for expensive laboratory and field studies to address the uncertainty in the study of only water quality data in the LANL WSAR reports:

"Due to uncertainties in the utility of aqueous chemistry assessments for the determination of whether samples are fully representative of aquifer conditions, it is recommended that laboratory and field studies be designed to validate these or similar criteria." (p. 6)

Groundwater contamination detected in the sole-source regional aquifer below LANL. The draft SPEIS does not accurately describe the LANL contaminants that are detected in the sole-source regional aquifer as documented in several LANL reports. The contamination mentioned in the regional aquifer in the draft SPEIS only include tritium, perchlorate and dioxane [1-4]. The SPEIS does not mention the large and poorly understood plume of hexavalent

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chromium in the regional aquifer within a region of many drinking water wells for Los Alamos County and bordering the property of the San Ildefonso Pueblo. See Figure 4-33, which is attached.

In addition, the chromium plume is located along a fast pathway (identified by a LANL computer model) for the hexavalent chromium to travel to the Rio Grande and to the Buckman well field, a large groundwater resource for Santa Fe. The highest levels of contamination measured in groundwater from the plume are 400 ug/L (400 parts per billion); a level eight times greater than the New Mexico Water Quality Standard of 50 ug/L.

11|14.E.10 (cont)

Well R-22 is the LANL characterization well installed close to the large 63-acre LANL legacy waste disposal site (MDA G) for mixed waste and the continuing active disposal site for low-level waste (Area G). LANL reports document a large suite of radionuclide and RCRA hazardous waste contaminants to be detected in the water samples collected from well R-22. The radionuclide contaminants include technetium-99 and tritium. The hazardous waste contaminants include many semi-volatile organic compounds. The many mistakes in the installation and sampling of well R-22 prevent the well from producing reliable and representative water samples.

Gilkeson is sending a report to you under separate cover that describes the contamination detected at well R-22 and the mistakes at well R-22 and the other LANL characterization wells that prevent the wells from being reliable for detecting the LANL contaminants. The title of the report is "*Properties of the Stainless Steel Screens in the LANL Characterization Wells to Prevent the Detection of Radionuclide and Hazardous Waste Contamination in Groundwater*" by Robert H. Gilkeson, Registered Geologist.

LANL trace metal radionuclide contaminants detected in the sole-source regional aquifer. The draft SPEIS acknowledges the radionuclide contamination that is present in the groundwater produced from alluvial sediments in Mortandad Canyon. Plutonium-238, plutonium-239, plutonium-240, and americium-241 are above the 4-millirem DOE standard for drinking water. The draft SPEIS does not inform the reader of the detection of these trace metal radionuclides in the water samples produced from the LANL characterization wells installed in the regional aquifer below Mortandad Canyon. This contamination is listed in Table F-17 in the 2006 LANL draft Site-Wide Environmental Impact Statement. The table lists a combined value of plutonium-239 and-240 of 0.601 pCi/L which is four times greater than the proposed drinking water standard of 0.15 pCi/L. The actual level of the trace metal radionuclide contaminants may be much higher in the sole-source aquifer. The

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11|14.E.10 (cont)

characterization wells have many features that reduce the level of contamination that is present in the water samples collected from the wells.

Due to the existing contamination in the regional aquifer, DOE must voluntarily comply with the requirements of the Espanola Basin Sole Source Aquifer designation.

12|14.K.1

New Research by Argonne National Laboratory identifies nanoclusters of plutonium. The nanoclusters are made up of exactly 38 plutonium atoms and have almost no electrical charge. The absence of charge makes the clusters very mobile for traveling through the vadose zone below the contaminated canyons and legacy waste sites to contaminate the sole source drinking water aquifer.

Presently, DOE/LANL have not installed any monitoring wells at locations close to the legacy waste disposal sites where large inventories of plutonium wastes are buried.

The clusters also are a problem for plutonium remediation. The free ions are relatively easy to separate out from groundwater, but the clusters are difficult to remove.

13|14.M.7

Accidents at TA-54. On page 5 - 74 the draft SPEIS makes the following statements about LANL facilities with highest risk for worker public safety:

> "Under all alternatives analyzed in the LANL SWEIS, the facility accident with the highest radiological risk to the offsite population would be a lightning strike at the Radioassay and Nondestructive Testing Facility located in TA-54."
>
> "Under all alternatives, the individual facility accident with the highest estimated consequences to the MEI and noninvolved workers would be a fire at a waste storage dome in TA- 54."

There are many problems at TA-54 that must be addressed. For example, the latest version of the Performance Assessment/Composite Analysis (PA/CA) for TA-54 available to the public is dated 1997. It has been over a decade since this document has been updated and made available to the public. Before a revised draft SPEIS is made available for public review and comments, the PA/CA must be released as well for public review and comment.

Please contact us should you have any comments or questions.

Sincerely,

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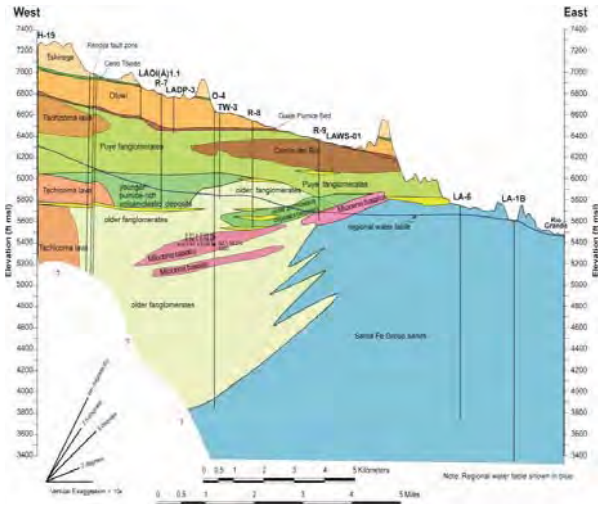

Figure 2-12. Conceptual cross-section for Los Alamos Canyon. Blue line is regional water table.

Source: LANL *Hydrogeologic Synthesis Report* (LA-14263-MS, December 2005)

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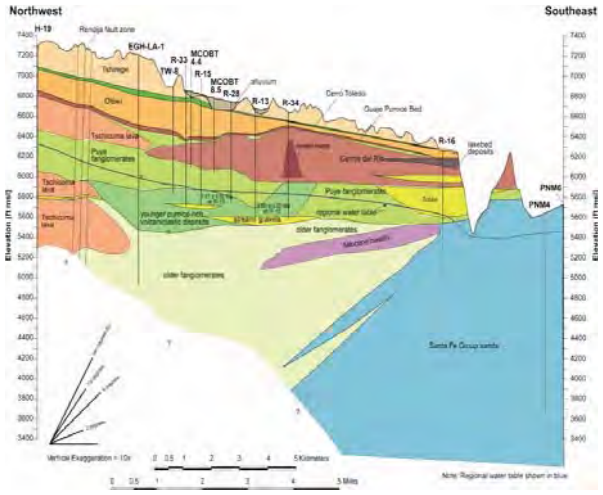

Figure 2-13. Conceptual cross-section for Mortandad Canyon. Regional water table is shown
in blue.

Source: LANL *Hydrogeologic Synthesis Report* (LA-14263-MS, December 2005)

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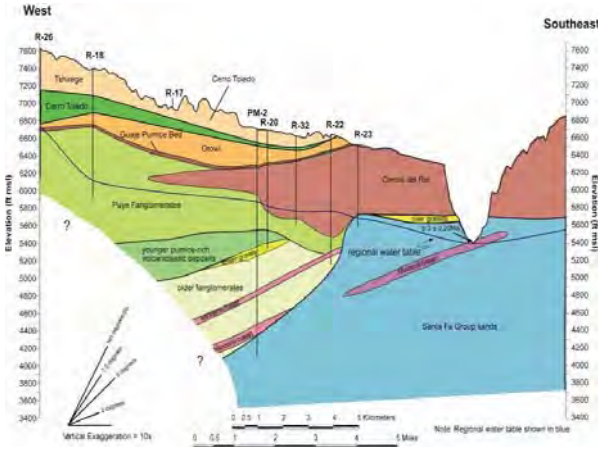

Figure 2-14. Conceptual cross-section for Pajarito Canyon. Water table is shown in blue.

Source: LANL *Hydrogeologic Synthesis Report* (LA-14263-MS, December 2005)

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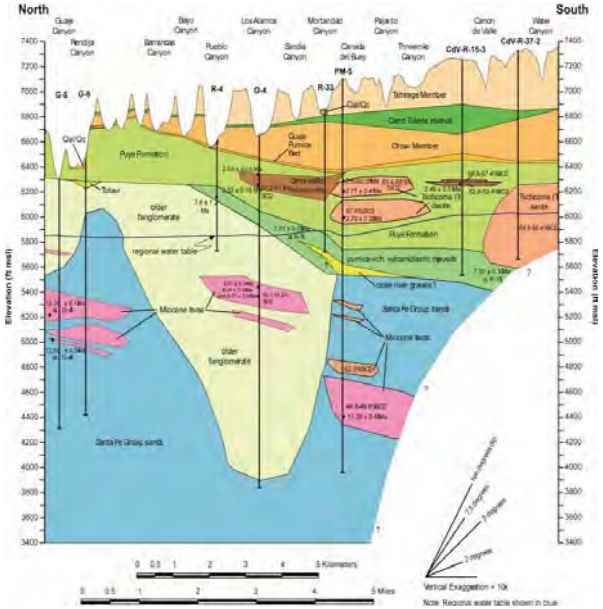


Figure 2-17. Conceptual southwest-northeast cross-section from TA-16 through the west-central portion of the Laboratory.

Source: LANL *Hydrogeologic Synthesis Report* (LA-14263-MS, December 2005)

18

Arends, Joni
Page 19 of 19

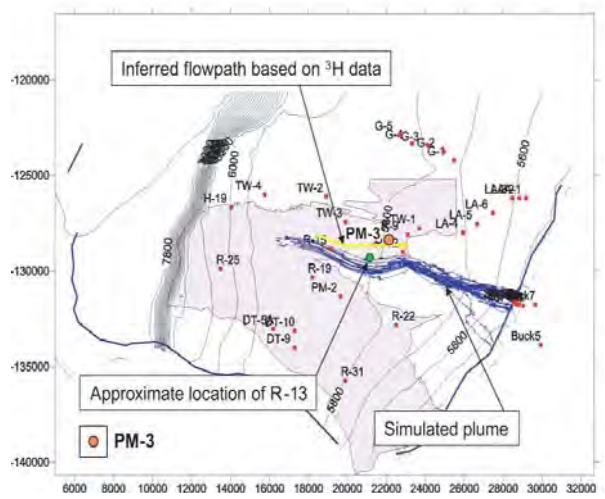


Figure 4-33. Predicted plume migration for sources released at the water table below Mortandad Canyon, based on a steady-state, with pumping, flow field.
(from *LANL Hydrogeologic Synthesis Report, ER 2005-0679, December 2005*)

19

Armijo, Esther

Page 1 of 1

PC_467

Buenaflor, Justin

From: Esther Armijo [earmijo@zianet.com]
Sent: Wednesday, March 12, 2008 5:02 PM
To: Complex2030
Subject: Nuclear plants

Esther Armijo
1011 Eagle Wings Rd
Las Cruces, NM 88007-6717

March 12, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|15A I most appropriately oppose building of a plant for plutonium pits for nuclear and modifications, which are all irresponsible to life itself.

Sincerely,

Esther Armijo

1

Armitage, David

Page 1 of 1

PC_436

Buenaflor, Justin

From: David Armitage [darmit7644@aol.com]
Sent: Tuesday, March 11, 2008 11:11 AM
To: Complex2030
Subject: New Nuclear Weapons

David Armitage
1962 Farndon Avenue
Los Altos, CA 94024-6944

March 11, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|8A Congress rebuked the Energy Department's last attempts to upgrade the arsenal by defunding the Reliable Replacement Warhead and last year's proposed mega-scale bomb plant. The CMRR project is another irresponsible new program that should be rejected.

Sincerely,

David Armitage
650-969-6529

1

Arrington, Karen
Page 1 of 1

PC_1783

Levens, Matthew

From: Karen Arrington [arringtonkla@yahoo.com]
Sent: Wednesday, April 02, 2008 9:52PM
To: ComplexZ030
Subject: No to New Nuclear Weapons Plant

Karen Arrington
3324 W. University Ave.-295
Gainesville, FL 32607-2540

April 2, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A No to the Bush Administration's plan to build a plant to produce plutonium pits for nuclear weapons.

1|16A No to plans to modify nuclear facilities which would facilitate the building of more nuclear weapons.

2|1J THIS IS THE UTMOST OF HYPOCRISY; the US decries the potential of Iran's nuclear program while the Bush Administration wants to increase nuclear weapons here. No wonder no one will listen to us! They know of our hypocrisy.

2|1J We need to reduce our nuclear weapons. That will show the world we are serious about peace.

Sincerely,

Karen Arrington
803.422.2698

Ash, Arlaina
Page 1 of 2

PC_919

Theodore Wyka
Complex Transformation SPEIS Document Mgr.
Office of Transformation, NA-10.1
U.S. Department of Energy, NNSA
1000 Independence Ave. SW
Washington, D.C. 20585

Dear Mr. Wyka,

1|16A I live within 2 miles of Sandia National Labs. I oppose any new nuclear bomb facility and I insist

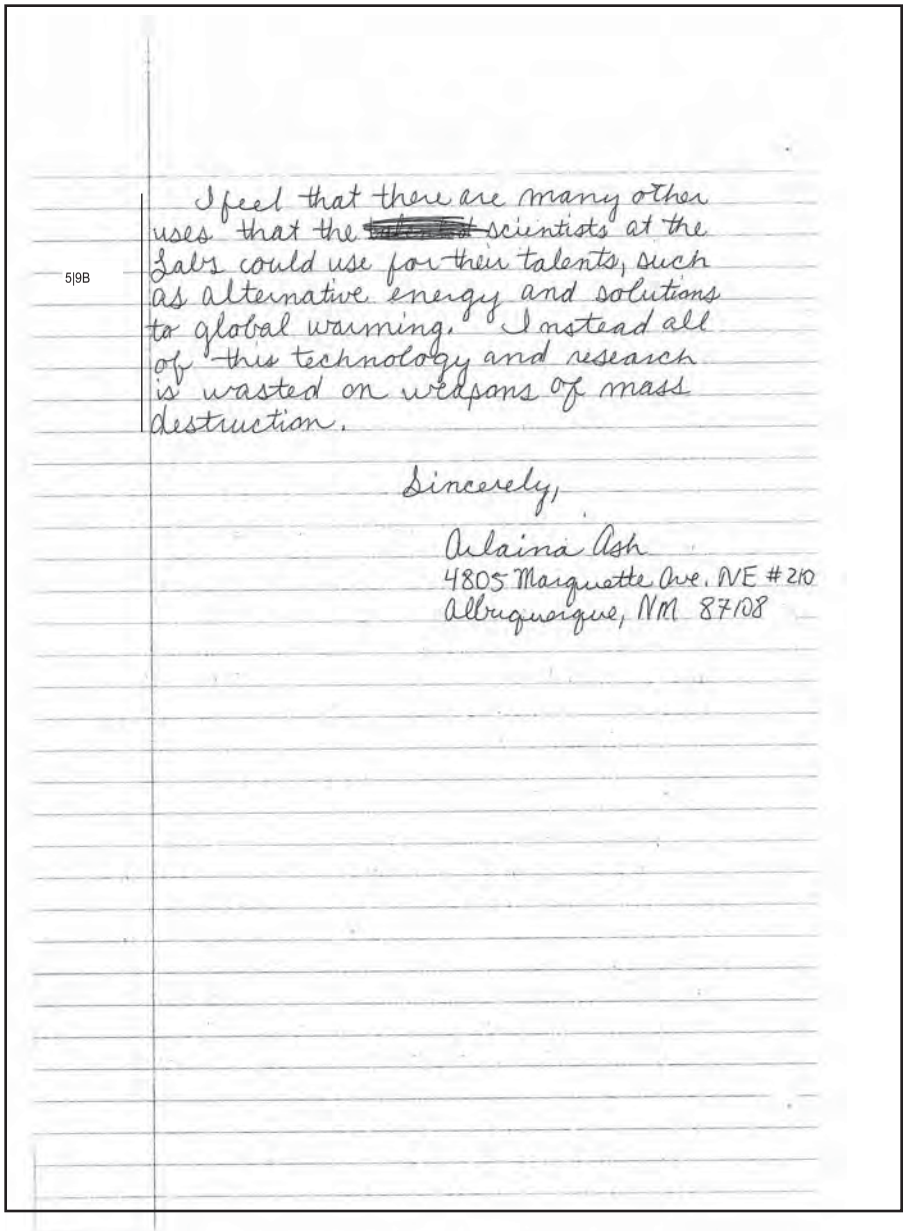
2|7J that the existing nuclear waste be cleaned up immediately.

3|3A There are already enough nuclear weapons in the world to blow the world up many times over. Any nuclear conflict would lead to complete and utter destruction of humanity and the planet.

~~There are many other~~

4|2B Myself, my friends and my neighbors, including families with young children, live near Kirtland AFB. The federal government recognizes the increased sensitivity of young children to toxins and has issued Executive Order #13045 to protect young children & pregnant woman from dangerous contaminants. However, in planning this proposed facility, this executive order was given no consideration

Ash, Arlaina
Page 2 of 2



5|9B I feel that there are many other uses that the [redacted] scientists at the Labs could use for their talents, such as alternative energy and solutions to global warming. Instead all of this technology and research is wasted on weapons of mass destruction.

Sincerely,

Arlaina Ash
4805 Marquette Ave. NE #210
Albuquerque, NM 87108

Ashley, Charles
Page 1 of 1

PC_409

Levens, Matthew

From: Charles Ashley [wenston@aol.com]
Sent: Tuesday, March 11, 2008 10:38 AM
To: Complex2030
Subject: Nuclear Weapons

Charles Ashley
31277 Watts Valley Road
Tollhouse, CA 93667-9510

March 11, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I strongly oppose the Bush's administration's proposal to build new nuclear weapons. This program is more about profits for defense industry investors than about defense itself.

Sincerely,

Charles M. Ashley
559-855-6376

1

Austin, Terry
Page 1 of 1

PC_2126

Levens, Matthew

From: terry austin [austin@ashlandhone.net]
Sent: Thursday, April 24, 2008 1:05 PM
To: ComplexZ030

1|16A The nuclear complex proposed should be null and void under International Law which already voted to outlaw the threat of, or use of, nuclear weapons in 1996, and US Law according to the Presidential Executive Order 12898 for Environmental Justice

All The Best,

Terry Austin

Avory, Thomas
Page 1 of 1

PC_328

Saint Joseph's Church

44 Benvenue Avenue
West Orange, New Jersey 07052-3227
Phone: 973-669-3221 Fax: 973-669-0385
E-mail: stjosephwestorange@hotmail.com
Website: www.stjosephwestorange.com

March 25, 2008

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
U.S. Department of Energy
1000 Independence Ave. S.W.
Washington, D.C. 20585

Dear Mr. Wyka,

I am writing to express my concern about our U.S. government's proposal to design new nuclear bombs and to expand the shelf life of our current stockpile of nuclear weapons. I hope you and the current administration stop this program entitled "Complex Transformation" because

1|16A 1) it is illegal, violating our agreements and responsibilities under the Nuclear Non-proliferation Treaty;

2|1F 2) it may well set off a new nuclear arms race in our world which is suffering enough from lack of basic human needs; and

3|1J 3) it is basically immoral to build, keep and intimidate humanity with such weapons of mass destruction that indiscriminately kill civilians and risk devastating all life on our planet.

1|16A (cont) For those of us who are Christians, this is the Easter Season when we celebrate the resurrected life of Jesus Christ and our invitation to share this new life. May you and the administration be guided by both humanly ethical and religiously moral values.

Sincerely,
(Rev.) Thomas P. Avory

Ayer, Donald
Page 1 of 1

PC_378

Levens, Matthew

From: ayerfarm@gmail.com
Sent: Wednesday, March 19, 2008 8:21 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Theodore Wyka, Complex Transformation SPEIS Manager Office of Transformation, NA-10.1 U.S. Department of Energy/NNSA Washington, DC 20585

Dear Mr. Wyka,

1|3A; 2|9B The United States has thousands of nuclear weapons, sufficient to destroy the Earth and more than enough to maintain a credible deterrent.
Instead of planning new nuclear weapons the DOE should be expending its funds on production of energy from coal (with removal of carbon dioxide) and on design of safer nuclear power plants.

3|7F 4|7E Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE should focus on shrinking the still-oversized nuclear weapons complex and on maintaining the safety and security of our existing weapons arsenal as the size of our nuclear stockpile is reduced.

Sincerely,
Donald Ayer
PO Box 168
Shelbyville, MI 49344-0168

1

Ayers, Connie
Page 1 of 1

PC_2127

Levens, Matthew

From: TERRY CONNIE AYERS [tcayes@q.com]
Sent: Wednesday, April 16, 2008 11:01 PM
To: Complex2030
Subject: comment on

1|16A I am strongly against this proposal to desigr and produce better nuclear weapons. The safety and environmental issues you want to improve I would not disagree with. I am for
2|1K non-proliferation, disarmament and redoing our nuclear policies. The Bush administration policy of regime change for states that we think are getting the ability to enrich uranium has proved to be a grand failure.
3|1J Please reconsider what would be best for the world. The USA should be the leader in disarmament.

Connie Ayers
181 NE Lynnwood Lp
Belfair WA, 98528

Ayers, Geraldine
Page 1 of 1

PC_272

13155 Royal Pines #1
St. Louis, MO 63245
March 31, 2008

Theodore A Wyka
Complex Transformation SPEIS
Department of Energy
1000 Independence Avenue SW
Washington, D.C.

Draft Complex Transformation SPEIS Comments

Dear Sir:

1|16A I am writing to voice my strong opposition to the construction of a new Plutonium Bomb Plant. The U. S. already has too many warheads and plutonium pits. We should be proceeding with dismantling some of our excess weapons instead of creating new ones at tremendous expense, financially and to the environment.

2|3A Our best thinkers are committing themselves to peace in the forms of poverty elimination, improvement of water supplies, eradication of preventable disease, education of children (including girls) and slowing down overpopulation around the world.

3|9B I am an 88-year old widow who has grieved over the wars and devastation, with the loss of lives and the suffering they have caused. We should not see ourselves as our brothers' and sisters' killers, but as their keepers so they can get a foothold in the global economy, with a cost far less to us than the billions we are spending weekly in useless war endeavors. I would like to see the healthy beginnings of peace and plenty and lack of fear for all God's children around the world.

Please – no new bomb plants.

Sincerely,

Geraldine Ayers

B., Jerry
Page 1 of 1

PC_1382

Levens, Matthew

From: Jerry b [jshhl@yahoo.com]
Sent: Tuesday, February 19, 2008 4:36 PM
To: Complex2030
Subject: Nuclear Weapons

Jerry b
410 S Main/PO Box 146
Bucoda, WA 98530-0146

February 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|13A.1 The world does not need more nuclear weapons. They need less. This action makes me feel less secure just like the cold war in the 50's and 60's.

2|1J How can we be a voice for non nuclear proliferation when we are willing to add to our nuclear arsenal?

3|16A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

Sincerely,

Jerry b
360-278-3277

1

Bach, Beth
Page 1 of 1

PC_1925

Levens, Matthew

From: bach [thebach@toast.net]
Sent: Thursday, April 10, 2008 4:56 AM
To: Complex2030
Subject: Comment on Draft Complex Transformation Supplemental Environmental Impact Statement

Telemachus, the fourth-century Christian whose boldness has been recounted in Charles Colson's Loving God.

The Asian hermit lived in a remote village, tending his garden and spending much of his in time in prayer. One day he thought he heard the voice of God telling him to go to Rome, so he obeyed, setting out on foot. 1|20
Weary weeks later, he arrived in the city at the time of a great festival.
The little monk followed the crowd surging down the streets into the coliseum. He saw who are the gladiators stand before the emperor and say, "We who are about to die salute you." Then he realized these men were going to fight to the death for the entertainment of the crowd. He cried out, " In the name of Christ, stop!" He made his way to Coliseum floor and placed himself between the gladiators pleading "In the name of Christ, stop!" Both the thought it was part of the show and began laughing.

When they realized it wasn't, the laughter turned to anger. As Telemachus was pleading with the gladiators to stop, one of them plunged a sword into his body. He fell to the sand. As he was dying, his last words were, "In the name of Christ, stop!"

Then a strange thing happened. The gladiators stood looking at the tiny figure lying there. A hush fell over the coliseum. Way up in the upper rows, a man stood and made his way to the exit. Others began to follow. In dead silence, everyone left the Coliseum.

The year was A.D. 391, and that was the last battle to the death between gladiators in the Roman Coliseum. Never again in the great stadium did men kill each other for the entertainment of the crowd, all because of one tiny voice that could hardly be heard above the tumult. One voice-one life-that spoke the truth in God's name.

I pass this story onto you to say in the name of a loving God who has provided great minds to do great things, please stop this insanity. Please stop using precious resources to destroy. There is a better way and all those politicians and scientist that are on this path are either seriously misinformed, or do not care about all the destruction they are causing regarding peoples health and our environment. This is evil at its worst not only destroying the present but also the future. Enough is enough. Start being honest, start dismantling the bombs, starts taking care of the people and the environment. 1|20 (cont.); 2|16A

The Romans although a great civilization had their life destroying arenas as you have yours. And their arena and your arena sadly to say is the same except yours is on a much greater scale. Entertainments of who can build the best weapons to kill others, destroy the Earth, pollute our environment, and consume our intellectual and financial resources. 1|20 (cont.)

Thank you for allowing me to comment.

Sincerely,

For the Love of Creation and the Creator,

Beth Bach

1

Backus, Margot
Page 1 of 1

PC_621

Levens, Matthew

From: Margot Backus [mbackus@uh.edu]
Sent: Friday, February 22, 2008 7:18 AM
To: Complex2030
Subject: nuclear re-armament

Margot Backus
2001 Colquitt Street
Houston, TX 77098-3405

February 22, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

It shocks me to the core that so much of the progress that informed American citizens have managed to make in pushing our country away from a disastrous route toward nuclear saber-rattling and nuclear proliferation, that we are currently contemplating taking an enormous step back in this discredited direction.

I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons. 1|16A

Building this new plant would send a contradictory message to other countries, such as Iran, who may be seeking nuclear weapons. While the U.S. is asking others to forego developing nuclear arsenals, we are simultaneously trying to increase our own capacity to build new nuclear weapons. 2|1J

Sincerely,

Margot Backus
(713) 526-1609

1

Badgett, Michael
Page 1 of 1

PC_1650

Levens, Matthew

From: Michael E. Badgett [mbadgett@roadrunner.com]
Sent: Saturday, April 05, 2008 5:26 AM
To: Complex2030
Subject: No More Nukes!

Michael E. Badgett
217 W. Church St.
Mount Airy, NC 27030-4609

April 5, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

I am also opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal.

I understand that the Chemistry and Metallurgy Research Replacement (CMRR) project would be able to produce 50 to 80 plutonium pits annually, the first major nuclear warhead production since the end of the Cold War.

2|1J Building this new plant would send a contradictory message to other countries, such as Iran, who may be seeking nuclear weapons. While the U.S. is asking others to forego developing nuclear arsenals, we are simultaneously trying to increase our own capacity to build new nuclear weapons.

3|8B 1|16A (cont) Congress rebuked the Energy Department's last attempts to upgrade the arsenal by defunding the Reliable Replacement Warhead and last year's proposed mega-scale bomb plant. The CMRR project is another irresponsible new program that should be rejected.

Sincerely,

Michael E. Badgett
336-786-2005

1

Baek, Joanne
Page 1 of 2

PC_1388

Levens, Matthew

From: joanne baek [joannebaek@yahoo.com]
Sent: Tuesday, April 29, 2008 3:04 PM
To: Complex2030
Subject: Comment: The best defense...

Dear Mr. Wyka,

All of humanity has the same basic needs. These include food, shelter, companionship, stability of situation, and protection from harm and disruptions of life that prevent meeting those basic needs. We share these things; these are our common ground and our basis for empathy and understanding and peace with one another. These, not weapons, are our path to peace and national security.

The only effective deterrent to harm is our willingness and eagerness that all others share in meeting these needs. To have peace, we must be a good neighbor, helping to resolve the challenges all face in having happy and safe lives today on this planet.

1|13A.1 2|1J To be a nation investing in weaponry for war, we are a nation who is willingly increasing our likelihood of waging it. Our investment towards the means for war and harm, does not help others invest in peace and health, but encourages them to react in fear, not taking care of their basic needs, but also preparing for war, and increasing the tension between our peoples, and harm acheived.

3|16A We MUST stop this study and mastery in the arena of harm to others, along with the stockpiling of weaponry, as the most ill-conceived of possible neighborly behaviors. We MUST get clear that what we want is improvements in well being, ours and everyone's, and we must put our efforts there.

Please stop the production of weapons completely, and change the mandates and vision of the Department of Energy to those which are in full support and help to creating the best possible lives for all.

Thank you,

5/16/2008

Baek, Joanne
Page 2 of 2

Page 2 of 2

PC_1388

Joanne Baek

PO Box 670

Arroyo Hondo, NM 87513

Be a better friend, newshound, and know-it-all with Yahoo! Mobile. Try it now.

5/16/2008

Baek, Joanne
Page 1 of 2

~~Yahoo! Notepad - joannebaek~~ ~~3/27/08 4:45 PM~~

~~Yahoo! Notepad~~ PC_1064 ~~Close Window~~

written comments by
Joanne Baek
PO Box 670
Arroyo Hondo NM 87513
3/27/08

~~Comments by Joanne Baek~~
~~Folder: Unfiled~~
~~Last Modified: 3/27/08 10:43 pm~~

Comments by Joanne Baek

My comments are in two parts. The first is about my reservations and concerns about the proposed future activities at LANL. The second part of my comments is about my enthusiasms and hopes for future DOE work and activities at LANL.

On second thought, I'll share just two of my concerns, and then speak to my enthusiams.

1|7F One concern I have, is that we are all ordinary people. None of us is so extraordinary that we can safeguard things which are so dangerous as these nuclear materials and weapons. We also cannot guarantee that in the future our leaders will always make the right choices, or that we, the people, will elect the wisest leaders. We cannot guarantee that everyone working at Los Alamos or with weapons will be 100% safe, 100% of the time. Nor that they will make the right choices every time. It is a dangerous gamble to do this work, and I feel these risks are far too high, with near certainty of eventual disaster. This is my first concern, that no matter how competent and brilliant and well-meaning, and wonderful the people of LANL and the DOE are, as humans, none of us can be good enough to do this particular work safely enough, nor to safeguard the weapons or materials from doing harm now or in the future.

2|10O My second concern relates to not the gambles, but to some of the certain consequences. I buy a lottery ticket now and then, and my loss is usually $1 at a time, or maybe $20/year. I am a poor person, and some people would even say that even $20 is too much wasted by a person in my circumstances. Whatever you might advise me, I will suggest it is nothing compared with the loss of a life. Nuclear weapons manufacture results in loss of life whether the weapons are used or not.

With nuclear weaponry, the losses will always be too high. Even if there were no dollar cost, the cost would be too high. I've heard that birth defects among nuclear workers are elevated. I have heard that thousands of nuclear workers have suffered through and died of cancers. I've heard that children in Los Alamos have an elevated rates of cancers. The moral foundation of this county is that all persons are created equal and have equal right to life. The loss of even one life is too much.

But I told you I have enthusiasms as well as concerns, so now for the good stuff.

3|9B My enthusiasms and hopes for LANL and the DOE rest in my own enthusiasm for creative group process, and in the capacity of scientists and engineers and other visionary people to solve problems. I would like to see these creative and capable minds engaged in powerful work that is wholly positive and directly focused on real solutions that will benefit people of this country and create an improvement in conditions around the world. I believe this would be a far greater deterrent to aggression and harm by others in the world. I believe too, that this would result in loss of interest in development of weapons globally. If you love your neighbors and your neighbors are helping you with your own creative projects, you don't go out and buy guns to protect yourself from them. I believe the workforce of LANL and the DOE can make a positive contribution towards peace and international security, if they will focus on objectives that meet the needs of all.

~~http://notepad.mail.yahoo.com/YY:3l062d2r01:02bx127&T=1218&pw=1&1~~ ~~Page 1 of 2~~

Albuquerque, NM

Baek, Joanne
Page 2 of 2

Yahoo! Notepad - joannebaek 3/27/08 4:45 PM

One of my favorite moments in history, a moment of exciting new beginnings, is the speech in which President Kennedy says that we will put a man on the moon within a decade. Imagine that, setting out to do the wonderfully impossible and doing it. And we were able to do it because we had a collective vision. We had experts and engineers and the best minds focused on this beautiful goal. I think President Kennedy would have liked to go on to address other issues such as poverty in such a focused manner, but we lost him too soon. I think he picked the man on the moon goal first because we have more experience and know-how to organize ourselves around meeting technological goals, than the greater challenges, including soft social technologies, of figuring out how to work on collective human needs.

I would love to stand up here and say what beautiful new vision LANL and DOE should work on. The problem is, I don't have that vision. Many have suggested that solving our energy needs with renewable solar and wind technologies is that vision. Can you see it? I can't see it. We've been talking about pitts and water contamination and loss of hope for the future among the peoples of sovereign nation neighbors to Los Alamos. My mind, our minds, have been on these discouraging issues full of downsides, and it's not very conducive to imagining beautiful solutions, to a focus on real needs, or to getting together as neighbors to create something beautiful for the world.

3|9B (cont)

I feel that the DOE and LANL need a new vision. We all need a new vision. We need to be talking about it, creating it. Or the DOE and LANL need to be creating it. Perhaps it must include, as many have suggested, the development of solar and wind technologies that put affordable or free energy production into every person's hands in this country. As a person with "environmental illness" and in consideration of Los Alamos people and neighbors, I would beg this to include the concept of "via absolutely nontoxic and no harmful means." Perhaps, too, it can be the design of absolutely nontoxic extremely affordable housing construction so that persons like myself don't go homeless through much of their life. Taken as high value scientific quests, these could be our own man on the moon endeavors for our own benefit and that of the world as well. Taken as a peace work, these could both eliminate our dependence on oil, and give us a technology and mission to share with the world as a friendly and moral neighbor would surely do.

I'm am 100% in favor of LANL and the DOE undergoing transformation. I would encourage dialog and visioning to make it a really great transformation, and one really worthy of bringing into the world. I'd like to see us envision meeting the basic needs of everyone now, every single person, and then go on to do it. That would create the security and peace we all desire. Thank you. Thank you for listening to me.

Print Date: Mar 27 10:43pm Copyright © 2008 Yahoo! Inc. All Rights Reserved.

http://notepad.mail.yahoo.com/XXY-9f062d/srt,0/?v=1276&s1224&pv=10 Page 2 of 2

Baer, Gail
Page 1 of 2

PC_1660

Levens, Matthew

From: ohskylark@yahoo.com
Sent: Saturday, April 05, 2008 10:55 AM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|20.0 In the book, The Plutonium Files, Eileen Welsome described, in Chapter 42 (January 1994: The Advisory Committee on Human Radiation Experiments, pp.447-448), Ruth Faden?s presentation to a White House panel, about unethical treatment of human beings, subjected to radiation, without their consent, and so subjected by a federal government agency (Faden was the Chairperson for the Advisory Committee on Human Radiation Experiments, and bioethicist who worked for Hopkins School of Hygiene and Public Health, and scholar at Georgetown University?s Kennedy Institute of Ethics.) Faden?s parents had survived the Holocaust. About the plutonium and radiation experiments on human subjects, Faden said, ? There?s nothing more terrifying for survivors of a horrible event than to hear other people trivialize it, or even worse, raise skepticism about whether the even ever occurred.?

2|15A I applaud the Department of Energy for moving forward with plans to consolidate and reduce the facilities, workforce, and redundant capabilities within the nation's sprawling nuclear weapons complex.

3|3A 4|5C1 However, Complex Transformation puts far too much emphasis on re-creating the unnecessary capability to research, develop, and manufacture new types of nuclear weapons. The United States still maintains thousands of nuclear weapons and has thousands more in storage -- more than enough to maintain a reliable and credible nuclear deterrent for the foreseeable future. We simply do not need the capability to make more or newer nuclear weapons.

5|1J In addition, Complex Transformation undermines U.S. efforts to stop the spread of nuclear weapons around the world. It violates the spirit and letter of the Comprehensive Test Ban Treaty and sends the wrong message to the world --that obtaining nuclear weapons will increase security.

6|1C Any major upgrade of the nuclear weapons complex must be preceded by a comprehensive analysis and re-evaluation of the role of nuclear weapons as an instrument of security policy.

7|11B That review needs to be done by the president and the Department of Defense, not the DOE, and Congress has already mandated that the next president undertake one.

Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE should focus on shrinking the still-oversized nuclear weapons complex and on maintaining the safety and security of our existing weapons arsenal as the size of our nuclear stockpile is reduced.

I ask that you include my comment as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project.

Thank you.

Sincerely,
Gail Baer

1

Baer, Gail
Page 2 of 2

PC_1660

3918 Melvern Place
Alexandria, VA 22312

cc:
Senator John Warner
Representative Jim Moran
Senator Jim Webb

2

Bailey, Marcia
Page 1 of 1

PC_617

Levens, Matthew

From: Marcia Bailey [wilmarc83@warmhearthva.org]
Sent: Thursday, February 14, 2008 3:22 PM
To: Complex2030
Subject: Citizen Comment regarding SPEIS, Complex Transformation

Mr. Wyka:

1|9B The majority of us Americans want the U.S. to do more to eliminate nuclear weapons, so the Department of Energy should be putting their resources into nuclear cleanup and "green" energy research, not expanding their weapons program.

2|8A Congress' recently rejected the Reliable Replacement Warhead program. These new warheads are not only unwanted, they are also unnecessary. The current U.S. nuclear stockpile will remain reliable for at least another 70 years.

3|9H With so many unresolved issues around nuclear waste storage, employee safety and compensation, as well as the popular will for reducing nuclear weapons it doesn't make sense for U.S. taxpayers to invest in a new generation of nuclear weapons facilities.

Marcia Bailey
1153 Oakland Sq
Blacksburg, VA 24060

1

Bailey, Mary Lou
Page 1 of 1

PC_129

Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

Written Comment Form

Must be received on or before April 10, 2008.

1|16A I am definately against Nuclear Proliferation in any form.

Mary Lou Bailey
265 E. Atchley Rd.
Sevierville, TN. 37876

Please use other side if more space is needed.

Comment forms may be mailed to:
Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Comment forms may be faxed to:
(703) 931-9222
or sent by electronic mail to:
complextransformation@nnsa.doe.gov

You may also submit comments through the project website which can be found at:
http://www.complextransformationspeis.com

Baird, Patty
Page 1 of 2

PC_684

Levens, Matthew

From: Patty Baird [pbaird@sciworld.con]
Sent: Tuesday, February 26, 2008 3:5) PM
To: Complex2030
Subject: Letter of support for NNSA's preerred approach

Attachments: SCI Support of NNSA Preferred Approach.pdf

SCI Support
INSA Preferre

Attached is a letter of support from SCI Consulting Services, Inc.
Thank you for the opportunity to comment and for holding the public hearings.

SCI Consulting
Patricia W. Baird
Senior Vice President
151 Lafayette Drive
P.O. Box 2501
Oak Ridge, TN 37831
office: 865-425-5203
cell: 865-406-6808

15|A

Baird, Patty
Page 2 of 2

PC_684

SCI
CONSULTING SERVICES, INC.
8230 Old Courthouse Rd. Suite 320 Vienna, VA 22182
Phone: (703) 759-3600 Fax: (703) 759-6001
http://www.sciworld.com

February 26, 2008

Mr. Ted Wyka
National Nuclear Security Administration
Office of Transformation NA-10.1
1000 Independence Avenue, NW
Washington, D.C. 20585

Dear Mr. Wyka:

Letter of Support

As an active member of the Oak Ridge community as well as a prime contractor for the Department of Energy in Oak Ridge, this letter is written in support of the following:

- Transformation of the Nuclear Weapons Complex to make it smaller, more responsive, more secure, safer, and more cost effective
- Continuation of the current Y-12 missions at the Y-12 National Security Complex;
- Distributed Centers of Excellence alternative
- Modernization/transformation of the Y-12 National Security Complex to support a smaller, safer, and more responsive Nuclear Weapons Complex (complete the Highly Enriched Uranium Materials Facility (HEUMF), build the Uranium Processing Facility (UPF), downsize to meet future mission requirements).

15|A

We believe that the items outlined above are the best approach for the United States, Department of Energy, the National NuclearSecurity Administration, and the region!

Sincerely,

Patricia W. Baird
Senior Vice President
Manager of SCI Oak Ridge Operations

Cc:
file-NNSA Y-12
Transmitted electronically as an attachment

"A Great Company to Work for and A Great Company to do Business with."

Baker, Marie
Page 1 of 1

PC_1801

Levens, Matthew

From: Marie Baker [mbaker@merr.com]
Sent: Friday, March 28, 2008 8:37 PM
To: Complex2030
Subject: no nuclear weapons

Marie Baker
5318 Weaver Road
Dodgeville, WI 53533-8829

March 28, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A As a 64 year old woman, I've been around long enough to understand the sinister nature of nuclear weapons and the great danger they pose to all of us. I would like to live in a world free of all nuclear weapons. They create a climate of fear.

I believe it's irresponsible to build a plant to produce plutonium pits for nuclear weapons, as the administration has proposed.

I am also against plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal.

2|1J While the U.S. is asking others not to develop nuclear arsenals, we are trying to increase our own capacity to build new nuclear weapons. This is hypocritical and will send the wrong message to countries who want more nuclear weapons.

Sincerely,

Marie Baker
608-935-9419

Baker, Sally
Page 1 of 2

Theodore Wyka,
Complex Transformation SPIES Document Mg. PC_217
1000 Independence Ave SW
Washington, DC 20585

Dear Mr. Wyka,

As I learned of the Complex Transformation proposal, I thought of all the urgent needs of the people of the USA, and beyond our own borders.

Nursing homes are filled with aged persons living in an environment that is disrespectful of their humanity, depriving them of their dignity throughout their last months, usually not years, as their privacy is not possible in barrack-like accommodations, as their care is so minimal it would be considered abusive among able-bodied persons, as many sustain actual abuses and abusive neglect, as any food or anything else brought in by family / friends is stolen by personnel so underpaid that they steal anything in sight to shore up their own survival, as the situation is so deplorable that anyone the least threatened with such a disposition of themselves becomes horrified at the thought. 1|9B

Children in the USA are daily underfed and hungry, dismissed merely as the responsibility of their parents! What difference does it make how irresponsible or so-poorly-paid-they-cannot-afford-adequate-food any parent is? If people are adamant in simply dismissing the abuse and neglect of these children as the responsibility of their parents … which parents, of course, do not deserve to eat either … the children could still be properly fed at school twice each day.

So many hard-working people are left destitute by the loss of a job or by an unjust low wage.

A huge proportion of the homeless are so mentally ill that the people serving them coffee can make the diagnosis. God forbid, these mentally ill people would be required to consume psychotropic drugs, even more detrimentally by injection to be sure, in order to receive a private one-room shelter and a food card.

Baker, Sally
Page 2 of 2

1|9B (cont.) They do not receive the privacy and dignity of that one-room shelter or food card, being more easily, and economically cost-free, dismissed as simply not wanting to work, so not deserving to eat or to live at a minimally civilized level.

2|14O While the Complex Transformation proposal would clearly waste huge sums of money to implement … even to discuss as a proposal. The USA already has the capability of destroying every human being, and everything else, on earth … more than a few times over. Can we become more "efficient" than this? Can we protect our own selves FROM this? Shall we entice other nations to follow the same ridiculous path, ensuring the destruction of everyone, and sooner rather than later? Being threatened provokes ludicrous responses!

3|1J Have those interested in the Complex Transformation proposal lost their minds? I am sure not! There is great profit for a few in the production of war weapons … assumed not to ever be engaged … too dangerous, too insane! The personal profit is the only goal, with self-assured immunity from the consequences of war … which is presumed will not be initiated, will not occur … on anyone's part. 4|16A

In the meantime, we will not address the concerns, the needs, the dignity of the elderly. Too bad the children are underfed and hungry, too bad their parents are not more responsible or capable. The mentally ill can suffer, while the States and the USA itself irresponsibly identify them as shiftless, lazy people.

I urge you to dismiss the Complex Transformation proposal that would unnecessarily, and to the great detriment of our country and humanity, outrageously expend huge fund amounts to implement. It is devastatingly grievous that the morality and the honor of our beloved USA, acquired at such enormous sacrifices militarily and in the personal lives of the earlier citizenry, is so thoroughly lost that personal gain, regardless of the cost to anyone else, even another's very life, has become the only standard of the citizenry of the present three generations.

Sincerely and Patriotically yours,
Sally Marie Baker

March 9, 2008

Ms. Sally Marie Baker
19169 Whitcomb St
Detroit, MI 48235-2056

Baldwin, Tammy
Page 1 of 1

United States of America

Congressional Record

PROCEEDINGS AND DEBATES OF THE 110th CONGRESS, SECOND SESSION

House of Representatives

THE HONORABLE TAMMY BALDWIN

Extension of Remarks

Honoring the Hiroshima-Nagasaki A-bomb Exhibition

PC_1069

February 14, 2008

Madam Speaker, I rise today to recognize the Hiroshima-Nagasaki A-bomb Exhibition at the Wisconsin Capitol rotunda. Because of the dedicated efforts of a coalition of Madison organizations, the Hiroshima-Nagasaki A-bomb Exhibition Committee, and the Hiroshima Peace Culture Foundation, this exhibition has made an incredibly important contribution toward educating Wisconsinites and our country about the devastation in Hiroshima and Nagasaki caused by nuclear weapons.

1|16A I am heartened by the mission of these organizations to spread peace and international understanding and grateful to the citizens of Madison who helped bring this vital message to our Capitol. I further commend the Exhibition's goal to raise awareness about abolishing nuclear weapons. This is an issue that demands our close attention.

2|1F I want to take this opportunity to reaffirm my support for nonproliferation strategies designed to eliminate weapons of mass destruction from U.S. and worldwide arsenals. I strongly support the Treaty on the Nonproliferation of Nuclear Weapons (NPT), which sets forth objectives to prevent the spread of nuclear weapons and weapons technology and further the goal of achieving nuclear disarmament. I also believe we need to terminate efforts to enhance U.S. military capabilities of the U.S. nuclear arsenal.

My thanks go out to the citizens and organizations of Wisconsin who have dared to imagine peace and help make it a reality.

Thank you, Madam Speaker.

Ball, Eldon
Page 1 of 1

PC_457

Buenaflor, Justin

From: Eldon Ball [eldonball@juno.com]
Sent: Monday, February 25, 2008 10:49 PM
To: Complex2030
Subject: No New Nukes!

Eldon Ball
3022 NE 140th St., #121
Seattle, WA 98125-3588

February 25, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I strongly oppose the Shrub administration's proposal to build a plant to produce plutonium pits for nuclear weapons. I am also opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal. I understand that the Chemistry and Metallurgy Research Replacement (CMRR) project would be able to produce 50 to 80 plutonium pits annually, the first major nuclear warhead production since the end of the Cold War.

2|1J Stupid! When the Cold War was over, ~1990, I thought the U.S. & Russia agreed to reduce their nuclear arsenals by 90%! Lets do it, now! No new nukes!

Sincerely,

Eldon Ball
206-366-8405

1

washington, DC

Bangert, Fran
Page 1 of 1

PC_475

Buenaflor, Justin

From: Fran Bangert [sr.fran@gbfranciscans.org]
Sent: Sunday, March 16, 2008 4:58 PM
To: Complex2030
Subject: Complex Transformation

Fran Bangert
80s5 No Chestnut St.
Green Bay, WI 54303-3431

March 16, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

My name is Sister Fran Bangert-805 No. Chestnut St. - Green Bay, WI 54303
- a contituent of Senator Feingold, Senator Kohl, Senator Kagen.

1|9B I am strongly opposed to any new nuclear plant productions at Los Alamos or anywhere else. At a time when we are disarming nuclear weapons, why rebuild? Let's put that money into the many needs here at home..education, health, efforts at peacemaking, jobs, and the many other areas in need. I work with low income families and recognize their struggle to make ends meet. Let's help make their lives easier, by meeting the needs mentioned above. Thank you.

2|16A Please Oppose Complex 2030 and the renamed effort--Complex Transformation.

Sincerely,

Sister Fran Bangert
920-432-0155

1

Bangert, Yvonne
Page 1 of 3

PC_1910

Levens, Matthew

From: publikationen@gfbv.de
Sent: Wednesday, April 09, 2008 11:29 AM
To: Complex2030
Subject: Complex Transforamtion SPEIS Comments

Attachments: Attachment information.; Nuclear Shoshone letter.doc

Attachment ırmation..txt

Nuclear (ıone letter.doc

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==
Yvonne Bangert
Gesellschaft fuer bedrohte Voelker (GfbV) Abt. Publikationen, Indigene Voelker, Internet
Postfach 2024, D -37010 Goettingen
Tel.: +49/551/49906-14, Fax: +49/551/58028
e-mail: publikationen@gfbv.de, homepage: http://www.gfbv.de
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1

Bangert, Yvonne
Page 2 of 3

PC_1910

"Complex Transformation SPEIS Comments"

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, D.C. 20585

Gesellschaft
für bedrohte Völker

GERMAN OFFICE
P. O. Box 2024
D-37010 Göttingen

phone +49 (0)551 49906-0
fax +49 (0)551 58028
e-mail info@gfbv.de

www.gfbv.de

SOCIETY FOR THREATENED PEOPLES INTERNATIONAL
(A) Vienna
(BiH) Sarajevo+ Srebrenica
(CH) Bern
(D) Göttingen+Berlin
(I) Bozen
(IRQ) Arbil
(L) Luxembourg
(NL) Groningen-Assen
(RCH) Temuco/Chile
(SCG) Pristina/Kosovo
(USA) New York

HUMAN RIGHTS ORGANISATION in consultative status with the Economic and Social Council of the UNITED NATIONS and in participatory status with the COUNCIL OF EUROPE

for human rights.
WORLDWIDE.

April 9, 2007

Dear Mr. Wyka,

1|16A; As a friend to the Shoshone, I am writing you to express my concerns and strong options relating to the plan "Complex Transformation," and the Nevada test site. For over half a century the Nevada test site which lies within the historical land of the Shoshone has been subject to nuclear testing and in turn the areas around this site which are also a part of Shoshone land have been contaminated by radioactive materials. On this ground I do not support "Complex Transformation" 1|16A (Cont) which would expose Shoshone land to more nuclear and radioactive materials and 2|14O cause further health and environmental problems for these people.

Attention must also be called to the violation the American government would incur with the engagement of this plan due to the recent decision made by the United Nations Committee on the Elimination of Racial Discrimination (CERD) regarding the Shoshone.

1|16A (cont) Therefore the testing, use, and development of nuclear weapons in the historical land of the Western Shoshone along with all other areas in the United States must end. Aid should also come to halt and heal the ill effects to the environment which 2|14O (cont) have occurred for the past fifty years. The suffering of the Shoshone people due to nuclear testing on their land is unwarranted and completely unfair.

As a supporter of human rights around the world, and especially for those of indigenous people Gesellschaft für bedrohte Völker (The Society for Threatened 1|16A (cont) Peoples) urges you to listen to the concerns and needs of the Shoshone and stop the "Complex Transformation" plan.

Thank you for your attention.

Sincerely,

Yvonne Bangert from the Ingenious Peoples Office
of the Society for Threatened Peoples

DONATION-ACCOUNT: Sparkasse Göttingen • BLZ 260 500 01 • Account 1909 • (IBAN) DE 87 2605 0001 0000 0019 09 • (BIC) NOLADE 21 GOE
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Bangert, Yvonne
Page 3 of 3

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     Datei/File:  Nuclear Shoshone letter.doc
     Datum/Date:  9 Apr 2008, 17:33
     Größe/Size:  198144 bytes.
     Typ/Type:    Unbekannt
```

Page 1

Barger, Elizabeth
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PC 131

STATEMENT ON THE DEVELOPMENT OF ATOMIC WEAPONS IN OAK RIDGE TENNESSEE
February 26, 2008 by Elizabeth Barger, Co-Founder: PeaceRoots Alliance

As a poet and an artist I live on the edge of incredible beauty and awe overlooking a gulf of horror and despair caused by insane greed for power and control from the thrones of empire. We all must stop and think of the immorality of war. We must not resolve differences with violence that pollutes the earth and devastates our and our children's future.

People speak of atomic energy as "clean". But the truth is, it is the dirtiest polluter of all. We talk about nuclear weapons as tactical, but in truth, they are mutually destructive. We forget that at our peril. In the process of enriching uranium for power or weapons, we produce a product that is so caustic, it eats away most of its storage containers. It is toxic and its radioactivity emits alpha, beta, and gamma radiation-the alpha radiation being mutagenic, meaning it affects DNA.

1|14M We already use this material in present day weapons because it is the heaviest metal known, is cheap and plentiful [as a byproduct] and has become essential as an armor destroyer. It is also phosphoric: burns at intensely high temperatures upon firing or detonation, releases tiny toxic and radioactive particles that can be breathed in, and has a half-life of 4.5 BILLION years. We have sown the DU in the Balkans. We are sowing the seeds of death and mutation in Iraq and Afghanistan. Our troops bring it home in their bodies. We have caused death and disease in American populations exposed to radiation where uranium is mined and the waste from the mining and the enrichment of uranium is disposed. All this waste lasts forever and we are running out of places to store it. Tennessee has already no place to send the waste it produces. The facility under Serpent Mountain and over an extensive aquifer is un-safe and Nevada won't take it.

We have people in this government who are determined to bomb and kill thousands of innocent men, women, and children in Iran because we want them to not develop atomic capability. The US has been arrogant and loose with the truth in this issue. We are the only country that has used atomic weapons against civilian or military targets.

2|1K There are still people who remember and can witness the pain and devastation of the American use of atomics against civilian population, but this administration is not listening. They don't care. And we continue to develop and use atomic weapons in the form of armor, bombs and bullets encased in depleted uranium, a byproduct of enriching uranium for use in power plants and weapons. There are marked increases in birth defects, cancer, and cancer in children of the
3|14K populations where this weaponry has been used, and, again I must mention, our troops are bringing the seeds of destruction home in their bodies, and their children are already reaping the consequences.

3|14K (cont) And now we want to increase the crime of atomic weapons that are even stronger and more radioactive that will kill more people immediately and over the centuries. This country has enough atomic weapons to destroy the world many times over. And now we want to use our resources to develop more and better destruction. This is insanity and the people who are pushing to carry this criminal insanity out will not be able to escape the consequences of these actions, no matter how safe they feel they can be from those consequences.

ATOMIC RAIN [Weaponized Uranium]

Beautiful women fall by in the atomic rain of war:
Our children, our friends, our people are dead! Are dying!
The dust of destruction lives in our seeds, foreboding strange changes,
lying seven times seven over our generations who must look into the dark glass of pain.
Oh, the laughter cuts so hard.
A smile dies in vain.

Ephraim, my son! My son!
Where are your eyes? Where are your little hands I want to hold?
My heart is wrung dry with anger.
Will there be enough tears in my sorrow to even sustain despair?
We breathe the ends of fire sifting through the window form.
Instead of children calling in,
there comes the awful storm.

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Barger, Elizabeth
Page 2 of 8

Some Documentation on Atomic Weapons

Hotlinks: Table of Contents:

- Atomic Weapons Cost
- Atomic Weapons Decision
- Atomic Weapons Programs/Topics
- Health Consequences
- The Manhattan Project, Los Almos and Hanford
- The Enola Gay
- The Aftermath of Atomic Weapons
- Nuclear Tests
- Visuals

Atomic Weapons

Atomic Weapons Cost in World War II

The total estimated cost of the Atomic program through August 1945 in World War II was $20 billion! This included the research, materials, plants and people. They estimated that each bomb that was detonated cost $5 billion.

This information was taken from: Richard G. Hewlett and Oscar E. Anderson, Jr., The New World: A History of the United States Atomic Energy Commission, Volume I, 1939/1946 (Oak Ridge, Tennessee: U.S. AEC Technical Information Center, 1972), pp. 723-724.

Atomic Weapons Decision

Standard Answer | My Thoughts

Standard Answer

The Atomic bomb was dropped to put an end to the war before we had to invade* mainland Japan. We knew that the fighting would be horrendous and that thousands on both sides would die if we had to invade Japan, as they would fight to the last man. So the bombs were dropped to prevent all that unnecessary death. It was estimated that the human losses would have been far greater in an invasion than was lost to the bombs in Hiroshima and Nagasaki. If by using the bomb to end the war and avoid that, that is what was going to be done. Truman and other top brass at the time, with the exception of Eisenhower, had no doubts about using the bomb on Hiroshima. They regarded the bomb as a military weapon, to be used in a just war, against the enemy.

(*Operations Coronet and Olympic were the assault battle plans for invading Japan)

We also wanted to show off our "new" weapon to the Russians as a subtle warning that they needed to pay attention. We were adamant that they would not try to take up where Hitler left off in Europe. We did not trust them, even though they were our ally, because of their failure to abide by the Yalta Conference Agreements. (Which is what they tried or wanted to do! Think about the Berlin Wall and why it went up) The Russians needed to understand that we "would use it" if we felt we had to.

We had spent quite a bit of money developing it, around 2 billion, so why would we develop something without showing the world what we had? We wanted to show our military superiority and flex our muscles at the same time. We also wanted to see what the real damage would be. We had tested it in remote areas, so the true scope of the damage path was something we were unsure of. (That is, if the thing even worked!)

It ended the war early.

Interesting note: that you will want to explore - Kokura, which had one of Japan's largest munitions plants, was the primary target for the second bomb, not Nagasaki. Having been forced to abandon their primary target, Kokura, because of haze and smoke, the B-29s Bockscar and The Great Artiste approached Nagasaki. Which was originally not even on the initial list. It was added, instead of Kyoto, the former capital of Japan, as third choice because it had not been bombed much so they could accurately gauge the destruction.

War official's choice: Nagasaki - excellent!

This site has the cities that were on the hit list and the reasons they were chosen or discarded. Look at the cities that were discarded and why..... you can show how "humane and diplomatic" our targets were.

Barger, Elizabeth
Page 3 of 8

Resource sites to gather information on the Decision to Drop the BIG ONES:
The Obliteration of Hiroshima by Stephen R. Shalom
Bound by the bomb War official's choice: Nagasaki
German, British, American Choices (A Bomb)
Scientists Quotes on Atomic Weapons Use the Atomic Bomb
Atomic Audit: The Costs and Consequences of U.S. Nuclear Weapons Since 1940
The Costs of the Manhattan Project - wow! Hiroshima: Was It Necessary?
ATOMIC BOMB: DECISION (Hiroshima-Nagasaki)
"THE DECISION TO USE THE ATOMIC BOMB" - THE H-NET DEBATE
The National Atomic Museum: Road to the Atomic Age & the Manhattan Project
Global Court Truman had no Doubts about the Bomb
Chronology of Events Leading to the Decision to Drop the Atomic Bomb - June - July 1945
Truman's Press Release August 6th about the Atomic Bomb
Truman Tells Stalin, July 24, 1945
Chronology regarding Truman and the Atom Bomb from 8/2/45 - 8/10/45
The Atom Bomb Truman Footlocker: The Atomic Bomb
The Atomic Bomb: A Turning Point in History The A-Bomb
Building Bombs, Talking Peace - downloadable file
Chronological Table of the Nuclear Weapon - 1700 - 1997 Atomic Spaces

Manhattan/Los Almos Project/Hanford
The History and Ethics Behind The Manhattan Project
The Manhattan Project and Before Los Alamos National Laboratory
General Groves' report about the successful test of the Atomic bomb
Hanford Site Washington: made the plutonium for the first bomb
Hanford History.... Bomb Hanford - Made Plutonium for 1st Bomb
A History of the Ideas Leading to the Discovery of the Atomic Bomb
The Manhattan Project and Los Alamos ThinkQuest: The Manhattan Project The Men behind the Bomb

The Enola Gay, "Fat Man" and "Little Boy"
Col. Paul W. Tibbets had been picked to fly the Enola Gay and he gave the plane his mother's first and middle names, Enola Gay. Approximately 200,000 people were killed by the two bombs
Enola Gay The Enola Gay Debate
General Paul Tibbets, World War II and the Enola Gay by General Brigadier Paul W. Tibbets Jr.
Biography of General Brigadier Paul W. Tibbets Jr. Enola Gay - Crew & Plane specs
Enola Gay Photo Gallery Cyber Exhibit: Enola Gay & Atomic Bomb
A-Bomb WWW Museum The Hiroshima Project Hiroshima Archive
The Atomic Bombing of Nagasaki
Book: The Decision to Use the Atomic Bomb, by Gar Alperowitz

Health Consequences
The Health Effects of NUCLEAR BOMBS Forgotten Fallout
Atomic: How much have we tainted the earth? Forgotten Fallout
Chapter 4: Test Fallout, Political Fallout Test Fallout, Political Fallout
Killing Our Own: Disaster of America's Experience with Atomic Radiation, 1945- 1982
Ethical Questions: Medical Researchers Some good came of it: Medical Uses
Nuclear Leftovers: What to do? Experimenting on Humans - Atomic
FAQ's Atomic Experiments??? Radiation Effects Research Foundation
Scientific Data of Nagasaki Atomic Bomb Radiation Effects Research Foundation
Fact Sheet: Nuclear Power Plant Emergency - What to do

Atomic Bomb Visuals:
The Hiroshima/Nagasaki Legacy Enola Gay Photo Gallery
Atomic Audit: Box 1: Visualizing the Cost of Nuclear Weapons

Barger, Elizabeth
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The Obliteration of Hiroshima by Stephen R. Shalom
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General Paul Tibbets, World War II and the Enola Gay by General Brigadier Paul W. Tibbets Jr.
Biography of General Brigadier Paul W. Tibbets Jr. Enola Gay - Crew & Plane specs
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Killing Our Own: Disaster of America's Experience with Atomic Radiation, 1945- 1982
Ethical Questions: Medical Researchers Some good came of it: Medical Uses
Nuclear Leftovers: What to do? Experimenting on Humans - Atomic
FAQ's Atomic Experiments??? Radiation Effects Research Foundation
Scientific Data of Nagasaki Atomic Bomb Radiation Effects Research Foundation
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Atomic Audit: Box 1: Visualizing the Cost of Nuclear Weapons

Barger, Elizabeth
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Castle Test Shots Dominic Test Shots HardTack Test Shots Ivy Test Shots
Nevada Test Shots Redwing Test Shots

Atomic Weapons Programs/Topics

Trinity Atomic Web Site and HEW Archive Links to the A Bomb
The Seattle Times: fifty Years From Trinity--Special Edition
Defense Technical Information Center Atomic Time Line U.S. Nuclear Weapons Cost Study Project
Nuclear Test Sites Explosives Unit-Bomb Data Center Related Materials A Bomb Nevada Test Site
New Mexico Timeline of the Atomic Age: From Hiroshima to the new French tests
INFINITY CITY - art exhibition of 50th Nuke Home Page Bureau for Atomic Tourism
Ex-USSR Nuclear Technologies and the World Titan II ICBM Missiles
Abandoned Missile Base VR Tour: The Main Map The Center for International Security and Cooperation
Nuclear Control Institute Home Page

The Aftermath of Atomic Weapons

"Father of the H-bomb:" Bomb Bitterness Leo Szilard - A Scientist of conscience
Atomic: How much have we tainted the earth? Nuclear factsheet
Nuclear Weapons: The High Energy Weapons Arch... The Hiroshima/Nagasaki Legacy
International Nuclear Safety Program International Nuclear Safety Program Map Updates
Campaign for Nuclear Disarmament International Nuclear Safety Center
Important Issues of the Nuclear Age Nuclear Structure and Decay Data: NuBase With the Q-value Calculator
INFINITY CITY - art exhibition of 50th anniv. Todd's Atomic Homepage Technology Review
Nuclear Age Peace Foundation

Nuclear Tests

First Nuclear Test, July 16, 1945: Trinity Site, Nevada Nevada Test Site
The Atomic Archive - Documents & Letter The U.S. Nuclear Weapons Cost Study Project
IHP Marshall Islands Program ABCNEWS.com: Dispatches Operation Crossroads Bikini Island Tests
Submerged Cultural Resources of Operation Cross... Operation Crossroads Bikini Atoll Home Page
Bikini Radiological Cleanup and Future Plans The High Energy Weapons Arch.
A Guide to Nuclear Weapons The Bureau of Atomic Tourism The Atomic Archive Test Sites
Scientific Data of the Nagasaki Atomic The Atomic Archive Los Alamos National Laboratory
Related Materials A Bomb Enola Gay Cyber Exhibit: Enola Gay and the Atomic Bomb
The Bomb Atomic Time Line The Bomb is born Explosives Unit-Bomb Data Center
The Bomb (An Avon Camelot Book) PILOT ONLINE - Operation Bravo - WW1
Atmospheric Testing - Atomic Bombs (WOW!!) Nuclear Data - Table of Known Tests
Nuclear Program at NRDC Pro Nuclear Test Personnel Review (NTPR)
Chart of Global Nuclear Weapons tests, 1945-1996 TekNovation Real Audio Video Bikini Operation

My Thoughts

(I watched a program on the History Channel this past week on the dropping of the A Bomb that totally reinforced my thoughts on it... You should see if it is on again and watch it. It was fascinating!)
We should **never** have dropped the Atomic bombs on those cities. Japan had been virtually cut off from the resources of the Indies, we were bombing their cities with impunity, we had virtually destroyed their navy ... **they were already done for and we knew it.** The USSBS (United States Strategic Bombing Survey) had concluded that Japan would have surrendered by the end of the year, without invasion and without the atomic bomb.
We dropped the bombs for the wrong reasons...
We wanted Japan to sign an unconditional surrender, which they did not want to sign as they were worried about the Emperor's role in post war Japan. We refused to say whether we would allow the Emperor to remain as ruler or give any indication about the retention of the imperial system. That was the "only" diplomatic sticking point to them on signing a surrender document. The Japanese had continued fighting only to try and secure a better bargaining position.

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The Emperor of Japan had started negotiations with the Russians to put an end to the war well, almost a year, before the Potsdam Conference. He had sent his nephew, Prince Konoye, to the Soviets to try and get them to help broker a peace that kept the Emperor in power. We asked the Soviets to delay giving them an answer...

Final terms offered to the Japanese in the Potsdam Declaration on July 26 made no mention of the Emperor or of the imperial system. The Soviets had stated that they would go to war with Japan, meaning she was totally left without any possible Allies and thoroughly routed.
WHY???? Because we had already decided to drop the bomb.
When the Japanese finally surrendered a day after the devastation of bomb #2... **the final surrender agreement included a part about the Emperor remaining in power and kept Imperial rule.** Sound familiar? That had been the only sticking point(s) before to an early Japanese surrender!
Meaning we had decided all along to have the imperial system & the Emperor stay in power after the war and had not ever meant to broker a peace until we had flexed our military strength to the rest of the world without a show of what the Bomb could do. (We also wanted to see and study the consequences of the bombings for ourselves....)
Also read the information on this site:
Use the Atomic Bomb

Some partial readings in preparation for this hearing, 2-26-08 in Oak Ridge, TN
Depleted uranium - Wikipedia, the free encyclopedia
... depleted uranium ... Depleted uranium munitions are controversial because of ... was at this time that depleted uranium was first stored as an unusable ...
en.wikipedia.org/wiki/Depleted_uranium - *153k* - Cached
Depleted Uranium Education Project
Features reports and information regarding **Depleted Uranium**.www.**iacenter.org/depleted/**du.htm - *36k* - Cached
Depleted Uranium
Information about **depleted uranium** in question and answer form. ... **Depleted uranium** is what is left over when most of the highly radioactive types ...**www.gulflink.osd.mil/faq/faq_du.jsp** - *31k* - Cached
WHO | Depleted uranium
Information about **depleted uranium** and its potential health effects. ... Potential health effects of exposure to **depleted uranium** ...www.**who.int**/mediacentre/factsheets/fs257/en - *28k* - Cached
Iraqi cancers, birth defects blamed on U.S. depleted uranium
... signals about the effects of **depleted uranium**, Iraqi doctors believe that it is ... **Depleted uranium** is a problem in other former war zones as well. ...**seattlepi.nwsource.com**/national/95178_du12.shtml - *44k* - Cached
Depleted Uranium
US Navy's Call for New **'Depleted' Uranium** Warheads ... DoD claims Bunker Busters do not use **'depleted' uranium** Claim contradicts offical records " ...www.**grassrootspeace.org**/depleteduranium.html - *75k* - Cached
Depleted Uranium Page
Information from the Federation of American Scientists. www.**fas.org**/man/dod-101/sys/land/du.htm - *5k* - Cached
Depleted Uranium
Depleted Uranium (DU) - Policies, Research, Fact Sheets, Relaited Links, Patied Education. ... **Depleted Uranium** Information for Service Members and Their ... www.**pdhealth.mil**/du.asp - *81k* - Cached
Depleted Uranium
... armored vehicles have never fired **depleted uranium** rounds in Hawaii, and there ... National **Depleted Uranium** Conference 2007 MORE ... www.**thepowerhour.com**/du.htm - *62k* - Cached
POISONOUS LEGACY www.**bushflash.com**/pl_lo.html - Cached
Depleted Uranium
Depleted uranium detected on Big Isle. The Army has confirmed that **depleted uranium** from a 1960s weapons system has ... **Depleted Uranium** - A Way Out? ... www.**gulfwarvets.com**/du.htm - *42k* - Cached

Depleted Uranium: Poisoning Our Planet
... problems results from exposure to **depleted uranium**, a radioactive metal used in ... Health and environmental effects of **depleted uranium** are at the heart of ...www.**truthout.org**/docs_2006/042007B.shtml - *22k* - Cached
Depleted Uranium: The Invisible Threat

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NATO used **depleted uranium** munitions in Kosovo. Now, critics are concerned that DU contamination may cause serious health problems for returning refugees.**motherjones.com**/news/.../total_coverage/kosovo/reality_check/du.html - *40k* - Cached
Depleted Uranium: The Trojan Horse of Nuclear War LEUREN MORET / World ...
... staged four wars using **depleted uranium** weaponry, illegal under all ... regions now contaminated with **depleted uranium** — from Egypt, the Middle East, ... www.**mindfully.org**/Nucs/2004/DU-Trojan-Horse1jul04.htm - *58k* - Cached
Depleted Uranium
Special report of the effects of **depleted uranium** on Gulf War and Balkans veterans. www.**guardian.co.uk/uranium** - *59k* - Cached
Use of "Depleted" Uranium Munitions
UK Troops in Gulf to use **Depleted Uranium** Shells - Study Validates Vets' Syndrome ... See the map of **Depleted Uranium** facilities and test ranges ... www.**the7thfire.com**/Politics and History/**Depleted-Uranium**.htm - *114k* - Cached
BBC NEWS | In Depth | Depleted uranium
WHO studies **depleted uranium** in Iraq ... the possible health effects of **depleted uranium** shells fired during the 1991 Gulf War. ... **Depleted uranium** information ...
news.bbc.co.uk/1/hi/in_depth/europe/2001/**depleted_uranium**/default.stm - *41k* - Cached
Human Health Fact Sheet: Depleted Uranium
(PDF) **Depleted uranium** metal was ... **depleted uranium** include use as tank armor, armor-piercing projectiles (antitank ... In a potential future use, **depleted uranium** could ...www.**ead.anl.gov**/pub/doc/**Depleted-Uranium**.pdf - *64k* - View as html
Nothing depleted about 'depleted uranium'
... 300 tons and 1,700 tons of **depleted uranium** were used in the Gulf War and the ... **Depleted uranium** is considered weakly radioactive. ...**globalresearch.ca**/index.php?context=viewArticle&code=BUL20060122&... - *45k* - Cached
Uranium & DU
... waste product) of enrichment is **depleted uranium** (about 89% of the original feed) ... **Depleted Uranium** ... **Depleted uranium** is not classified as a ... www.**uic.com.au**/nip53.htm - *24k* - Cached

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Soldier Health Scare Back in News

By Audrey Parente Daytona Beach News Journal Sunday 15 April 2007

Lori Brim cradled her son in her arms for three months before he died at Walter Reed Army Medical Center in Washington. Dustin Brim, a 22-year-old Army specialist had collapsed three years ago in Iraq from a very aggressive cancer that attacked his kidney, caused a mass to grow over his esophagus and collapsed a lung.

The problems she saw during her time at Walter Reed, including her son screaming in pain while doctors argued over medications, had nothing to do with mold and shabby conditions documented in recent news reports. What this mother saw was an unexplainable illness consuming her son.

And what she has learned since her son's death is that his was not an isolated case.

Lori Brim has joined other parents, hundreds of other sick soldiers, legislators, research scientists and environmental activists who say the cause of their problems results from exposure to depleted uranium, a radioactive metal used in the manufacture of U.S. tank armor and weapon casings.

Health and environmental effects of depleted uranium are at the heart of scientific studies, a lawsuit in the New York courts and legislative bills in more than a dozen states (although not in Florida).

News stories claiming negative signs of depleted uranium's impact, including death and birth defects, are surfacing from Australia to England to the Far East. The controversy rages within government bodies and underlies the theme of TV shows like a recent episode of the medical series "House."

While the military continues to deny the connection of depleted uranium to sicknesses plaguing returning servicemen and women, a newly mandated study stemming from legislation signed by President Bush in October is just getting under way.

Opposition

The new study, which began in March, follows several that have been completed by the military into depleted uranium, a byproduct left when enriched uranium is separated out for use in nuclear power and atomic weapons. The Department of Energy gives it to arms makers, where its extreme density is valuable in the manufacture of armor and casings.

Despite a 1996 U.N. resolution opposing its use because of discovery of health problems after the first Gulf War, the military studies have concluded there was no evidence that exposure to the metal caused illnesses.

To the military, the effectiveness of weapons and armor made with depleted uranium outweighs any residual effects. Their bottom line: Depleted uranium saves soldiers' lives in combat.

Robert Holloway, president of Nevada Technical Associates Inc., a firm that specializes in radiation safety training, disputes any concern over depleted uranium.

"I have no financial interest in promoting depleted uranium," Holloway wrote in an e-mail to The News-Journal. "There really is no substitute for depending on the judgment of professionals in this field."

Holloway and others who believe depleted uranium is safe to use say the best authority in the scientific community would be individuals connected to the Health Physics Society.

Doug Craig of Ponce Inlet, a retired radiation biophysics scientist, is such a person. He doesn't believe low doses of radiation from depleted uranium are a problem.

"Uranium occurs in a lot of places," Craig said, "and man has been exposed to low concentrations of uranium for a long time."

Laws and Lawsuits

But Brim and others think there will not be enough known until soldiers are tested for exposure. They compare the debate over depleted uranium to the controversy surrounding Agent Orange, the toxic herbicide used to defoliate the jungles of Vietnam. Speculation over its effects continued for more than two decades before the Defense Department agreed to compensate veterans who suffered from ailments linked to its use.

Brim often comforts other mothers whose sons and daughters are suffering from unexplainable, aggressive cancers, like a Michigan mother Brim met on the Internet.

The Michigan mom says she believes malignant tumors that resulted in removal of her Marine son's ear, ear canal and half his face may be linked to depleted uranium. But the woman asks that her name not be used because her son still is a Marine - battling cancer, not bullets. And he has not been tested for DU exposure, she says.

Barger, Elizabeth

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PC_1641

Levens, Matthew

From: loveliz77@yahoo.com
Sent: Saturday, April 05, 2008 12:09 PM
To: Complex2030
Subject: Complex Transformation SPEISComments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|14O; 2|14K, 3|9B I am sure you know that the use of nuclear weapons is not only ecologically deadly, but is also hard on humans and our living heritages. Better use of our investment in nuclear would be to use the well trained and dedicated workforce already in place, to disarm redundant nuclear warheads.

4|1J The US should assume leadership in nonproliferation instead of the immoral and illegal build up of weapons of mass destruction.

5|13A.1 6|18B To continue to develop nuclear weapons does not make us safer, it makes us a target. We do not need to take jobs away from the present patriotic and radioactive personnel, we can keep them gainfully and profitably employed making the world a safer place by disarming most of our nuclear arsenal.

7|3A We have at our disposal more than 100 times the potential for destruction of the world. We can afford to disarm most of it.

1|14O (cont.) Continuing to mine and enrich uranium is not good for the planet. Even the by product, so called depleted uranium, is toxic, caustic and hard to store, and has a half life of 4.5 Billion years.

I ask you to include my comment as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project.
Thank you.

Sincerely,
Elizabeth Barger
PO Box260
Summertown, TN 38483

cc:
Senator Lamar Alexander
Senator Bob Corker

Barnett, Kerttu

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PC_1130

Levens, Matthew

From: KERTTU BARNETT [barnettkertu@earthlink.net]
Sent: Thursday, March 27, 2008 12:57 PM
To: Complex2030
Subject: new nuclear arms

KERTTU BARNETT
PO.BOX 434
ROSENDALE, NY 12472-0434

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A 2|9B No more nuclear arms,not a single one. We need to consentrate for solving problems created by Climate Change . No time to waste for building more arms

Sincerely,

KERTTU BARNETT
9456503971

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PC_693

Levens, Matthew

From: pharb2@msn.com
Sent: Friday, March 21, 2008 8:35 PM
To: Complex2030
Subject: Nuclear weapons projects

Theodore Wyka:

1|16A I believe the country should have a strong military and that does include nuclear weapons.
But I believe that no manufacture of any nuclear weapons program of any kind should be done in New Mexico.
2|10B At one time Los Alamos was probably the most secure facility on the face of the earth.
But not any more.
los Alamos is beat down and tired.
Locating any nuke program there would be a huge mistake.
Look at all the security breaches they've had over the years.
Los Alamos is a joke.

Phillip Barr
2836 Northacres
Hobbs, New Mexico

Barr, Phillip
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PC_1836

Levens, Matthew

From: pharb2@msn.com
Sent: Wednesday, April 02, 2008 10:02 AM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Theodore Wyka:

14E.1 There is always the possibilty of other sites in New Mexico being used for nuclear weapon component construction. The water supply in Lea county, the Ogallala aquifer , is in extreme decline. See state of New Mexico file below (and link.)

For this reason, no nuke projects should be allowed here in Lea county.
They should go to another state where there is plenty of water.

Phillip Barr
2836 Northacres
Hobbs, New Mexico

found at this link

http://www.ose.state.nm.us/water-info/NMWaterPlanning/regions/leacounty/5-LegalIssues.pdf<http://www.ose.state.nm.us/water-info/NMWaterPlanning/regions/leacounty/5-LegalIssues.pdf>

ck out section- (5.4.2 Ground-Water Drawdown)

LEA COUNTY REGIONAL WATER PLAN Water Resources Assessment 5-1

5. LEGAL ISSUES

5.1 INTRODUCTION

Lea County is committed to thoroughly studying its water supply and the demand for water in Lea County so that it can manage this precious resource to meet the current and future demand for water in Lea County. Legal issues can potentially have a significant impact on a county's supply of and demand for water. This section thus discusses the federal, state and local legal issues that may impact the supply of and demand for water in Lea County. This discussion is important in assessing Lea County's future need for water and its ability to meet such need.

As the following discussion indicates, there are no federal legal issues that directly constrain water supply in Lea County or Lea County's ability to adequately plan for future demand of water in Lea County. However, the Pecos River Compact and the United States Supreme Court's ruling in Texas v. New Mexico, 462 U.S. 554 (1983), while not placing a direct burden on Lea County's water supply, may indirectly affect Lea County's water supply by creating pressure for water users outside of Lea County to obtain water from Lea County as an alternate source of water. State legal issues similarly do not appear to directly affect the supply of or demand for water in Lea County. One state legal issue of concern to Lea County, however, is the potential effect that the New Mexico State Supreme Court ruling in Mathers v. Texaco, Inc., 77 N.M. 239, 421 P.2d 771 (1966) will have in causing water levels in Lea County's underground water basins to continue to decline. As

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discussed in more detail below, Lea County is attempting to resolve this concern by appropriating the remaining water rights in the Lea County Underground water basin so it can conserve these rights and have flexibility to better plan for development and expanded use of water in Lea County.

5.2 FEDERAL LEGAL ISSUES IMPACTING THE SUPPLY OF AND DEMAND FOR WATER IN LEA COUNTY

No federal reservations, federal environmental law issues, treaties, or federal water projects are known to exist within Lea County. In addition, no known, direct compact obligations currently exist within Lea County. As discussed in Section 5.2.1, federal water quality standards, however, do apply to all municipalities within Lea County. As also discussed by Section 52.1, federal water quality standards do not impact the supply of or demand for water in Lea County. As discussed in Section 5.2.2 and 5.2.21, however, the supply of and demand for water in Lea County may be indirectly impacted by the Pecos River Compact and the United States Supreme Court's decision in Texas v. New Mexico, 462 U.S. 554 (1983).

5.2.1 Impact of Federal Water Quality Standards on the Supply of and Demand for Water in Lea County

All municipalities within Lea County must comply with current water quality standards for drinking water established by Federal law. The current guidelines for assessing the suitability of a surface water or ground-water for use as a public water supply are the regulations mandated by the U.S. Environmental Protection Agency (EPA). The regulations are delineated in Title 40, Parts 141 and 143 of the Safe Drinking Water Act. The primary regulations include maximum permissible levels for inorganic and organic chemicals, turbidity, coliform bacteria, and radiological constituents. In accordance with the Safe Drinking Water Act, the EPA promulgates a regulatory scheme for maintaining the quality of the public drinking water. The New Mexico Environment Department (NMED) has primacy to adopt and implement the EPA standards in regulating community water facilities. Federal drinking water standards, as enforced by the NMED, and the results of the most recent laboratory results of the major public water supply systems in Lea County are summarized in Tables 11 and 12 in Section 6.2. As these Tables indicate, the water quality in the major public water supply systems meets the standards promulgated by the EPA. As a result, these standards do not negatively affect the supply of or demand for water in Lea County.

LEA COUNTY REGIONAL WATER PLAN Water Resources Assessment 5-2

5.2.2 The Pecos River Compact and Texas v. New Mexico (1983)

The 1949 Pecos River Compact between New Mexico and Texas divides the water of the Pecos River between the two states. Due to the river's irregular flow, the Compact does not specify a particular quantity of water to be delivered to Texas by New Mexico annually. Instead, in Article III(a), the key provision of the Compact provides that ..."New Mexico shall not deplete by man's activities the flow of the Pecos River at the New Mexico-Texas state line which will give to Texas a quantity of water equivalent to that available to Texas under the 1947 condition."

In 1974, Texas filed an original action in the United States Supreme Court to resolve a dispute between the two states as to the meaning of "1947 condition." A Special Master was appointed and, in 1979, filed a report defining "the 1947 condition" and proposed a method of determining Texas entitlement to water. The Supreme Court adopted the Special Master's report in its entirety.

The successor to the original Special Master held hearings to determine whether, based on the method adopted by the Supreme Court, New Mexico had fulfilled its Compact obligations. The Special Master issued a report concluding that for the years 1950-1983, New Mexico had fallen short in its delivery requirements by 340,100 acre-feet. The Master recommended that New Mexico be required to not only perform its ongoing Compact obligations, but also be required to make up the delivery shortfall by delivering 34,010 acre-feet of water each year for ten years, with a "water interest" penalty for any bad faith failure to deliver the make-up quantities. In Texas v. New Mexico, 462 U.S. 554 (1983), the Court accepted the Special Master's conclusion regarding the shortfall quantity, but returned the matter to the Master for further proceedings and recommendations regarding whether New Mexico should be allowed to elect a monetary rather than an in-kind remedy. The Court issued a decree which enjoined New Mexico "to comply with its Article III(a) obligations under the

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Pecos River Compact and to determine the extent of its obligation in accordance with the formula approved by the decisions of this Court."

The Supreme Court's holding in Texas v. New Mexico requires New Mexico to make as much water as possible available for delivery to Texas in order to meet the Compact obligations. New Mexico is now forced to acquire, by purchase or lease, water rights in the Pecos River system to meet its delivery requirements to Texas. Through the Interstate Stream Commission (ISC), the State is currently purchasing water rights in the Pecos River system and placing those rights in the Pecos River Conservation Project. However, if there are insufficient irrigation rights available to reach compliance, the State will be forced to retire junior water rights upstream or strictly enforce forfeiture statutes across the board. Strict enforcement of forfeiture statutes would affect every water user in the Pecos River system.

5.2.2.1 Impact of the Pecos River Compact and Texas v. New Mexico (1983) on the Supply of and Demand for Water in Lea County

Available information indicates that water in the Capitan Underground Water Basin is in hydraulic communication with the Pecos River. Withdrawals from the Capitan UWB could cause reduction in the flow of the Pecos River and the supply available to wells in the Pecos Valley. Consequently, New Mexico's obligations under the Pecos River Compact could affect existing water rights, as well as the availability of ground-water for future appropriations, within the Capitan UWB. Portions of the Carlsbad UWB are also thought to be hydrologically connected to the Pecos River. However, the portion of the Carlsbad UWB within Lea County has no known hydrological connection to the river, and appropriations within that area should not be affected by New Mexico's Compact obligations.

An additional concern is that the reduction in the availability of water in the Pecos River system will cause

municipalities and industry in that region to attempt to appropriate greater amounts of water from Lea County. As discussed in Section 5.4.3, litigation has already arisen out of attempts by water users to appropriate large quantities of ground-water from the Lea County UWB for use outside the basin.

LEA COUNTY REGIONAL WATER PLAN Water Resources Assessment 5-3

5.3 STATE LEGAL ISSUES IMPACTING THE SUPPLY AND DEMAND FOR WATER IN LEA COUNTY

5.3.1 Surface Water

Surface waters within the State of New Mexico are public and subject to appropriation for beneficial use. Beneficial use provides the basis, measure and the limit for all water rights Surface water use in all of New Mexico is governed by the provisions of NMSA 1978, 72-5-1 through 72-5-39 (1997).

Surface water within Lea County is limited to ephemeral streams, lakes, and small playa lakes that result from rainfall during the summer months. Some surface water runoff is impounded for livestock purposes. None of these ephemeral waters fall within the jurisdiction of the New Mexico Office of the State Engineer (NMOSE) because they are not viewed as surface waters subject to appropriation for beneficial use. Since surface water in Lea County is not subject to appropriation and is predominantly lost to evapotranspiration, such water currently does not impact Lea County's present or future availability of water. Lea County may, however, study alternative methods of using ephemeral waters to recharge its aquifer. See Aquifer Recharge, Section 8.1.2.4 If a suitable method is found to recharge Lea County's aquifer using ephemeral waters, the fact that such waters are not subject to appropriation by the general public will enable Lea County to use ephemeral waters to supplement its water supply.

Additionally, Surface water outside of Lea County is not diverted for beneficial use within the County. Therefore, surface water within or outside of Lea County does not currently impact Lea County's availability or supply of water.

1.. 5.3.2 Ground-Water

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5.3.2.1 State Statutes Affecting Ground-water in Lea County PC_1836

New Mexico statutes provide that the water of underground streams, channels, artesian basins, reservoirs or lakes, having reasonably ascertainable bodies are public waters of the State, and are subject to appropriation for beneficial use. Appropriation of ground-water from basins declared by the NMOSE is governed by the provisions of NMSA 1978, 72-12-1 through 72-12-28 (1997). As discussed in Section 5.3.2.2, the primary ground-water sources in the Plan area governed by these statutory provisions include, from north to south, the Lea County UWB, the Capitan

UWB, the Carlsbad UWB, and the Jal UWB. In addition, a small portion of the Roswell UWB lies within west-central and northwest Lea County.

In addition, New Mexico regulates ground-water quality pursuant to its own Water Quality Act in 20 NMAC 6.2. Under this Act, NMED and the Oil Conservation Division (OCD) implement ground-water protection standards and regulate discharge by all activities that could impact the supply of protectable ground-water. New Mexico ground-water quality standards, for the most part, mirror the federal standards for drinking water. A key contaminant of concern in New Mexico and Lea County is nitrogen, particularly in the form of nitrate, which can originate from many sources. NMED in administering its ground-water protection program is, to a large extent, concerned with limiting the amount of nitrogen that enters underground-water supplies. These standards have a positive impact on Lea County's supply of water in that these standards help protect the quality of Lea County's water.

LEA COUNTY REGIONAL WATER PLAN Water Resources Assessment 5-4

5.3.2.2 State Regulatory Policies Affecting Ground-water in Lea County

The NMOSE has jurisdiction over appropriation of ground-water within declared basins for beneficial use. Permits may be issued, provided that application is made to the NMOSE and is subjected to notice and the opportunity for protest. The permit will be granted if the NMOSE determines that there is available water, the granting of the application will not impair other water rights, and will not be contrary to the conservation of water within the state or detrimental to the public welfare of the state. In addition, NMSA 72-12-1 allows parties to obtain a permit without notice if they are seeking to appropriate up to three-acre-feet of ground-water from a declared basin for domestic use, livestock, watering, or up to one acre of non-commercial irrigation, or to seek to use the water right for prospecting, mining, or construction of public works, highways and roads or drilling operations designed to discover or develop the natural resources of the state. The NMOSE will grant the permit as long as the proposed use will not permanently impair the existing water rights of others. All permits may be subject to conditions. For instance, consumptive use figures for ground-water, which vary depending upon the source of supply and purpose of use, may be calculated and imposed upon permits.

5.3.2.2.1 Declared Ground-water Basin Criteria - Lea County Underground-water Basin

The Lea County UWB (see FIGURE 4) was declared by the NMOSE in 1931 and closed to further appropriation in 1948. The basin was extended in 1952, and Orders reopening parts of the basin to further development were issued in 1952 and again in 1953. In 1953, the NMOSE developed specific administrative criteria for managing ground-water appropriations within the Lea County UWB.

Because the Lea County UWB is a "mined basin,"1 it is administered to allow ground-water use at rates which will not deplete its reserves in less than a predetermined forty-year planning period. The current administrative criteria estimate the annual ground-water recharge within the basin to be approximately 29,000 acre-feet, although estimates by others2 indicate a recharge in the range of 29,000 to 58,000 acre-feet may occur. The current administrative criteria permit the annual basin-wide withdrawal of approximately 440,000 acre-feet.

The NMOSE has divided the Lea County UWB into individual management units known as "townships," or "blocks." Block administration, when used in conjunction with a time dimension, attempts to insure a uniform life for most of the water rights, and permit the orderly development and greatest use of the ground-water resource by distributing the points of diversion throughout the basin. Unfortunately, the majority of diversions occur on the eastern portion of the basin because the lack of good soil cover on the western

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portion of the basin generally prohibits agriculture. There are 71 administrative blocks in the Lea County UWB. PC_1836

The NMOSE applies the "move-to area" test to all applications to change the location of a well, the place the water from a well is used, or the way the water is used. Under this test, if moving the well, or changing the place or method of use, will impair existing rights in the move-to area, the application will likely be denied. In the Lea County UWB, water rights transfers between blocks will not be permitted where the move-to block is fully appropriated, or does not have enough water available. Several blocks within the Lea County UWB are closed to new appropriations.

5.3.2.2.2 Declared Ground-water Basin Criteria - Capitan Underground-Water Basin

The Capitan UWB (see FIGURE 4) was declared by the NMOSE in 1965. The basin includes the portion of the Capitan reef and near associated backreef formations not included in the previously declared underground-water basins. Water is currently available for appropriation from several aquifers within the Capitan UWB, provided that there would be no impairment or detriment to existing water rights. In the Capitan UWB, consideration of an

1 A "mined-basin" is a ground water basin in which well withdrawals exceed recharge.

2 Theis, 1934 and McAda, 1984

LEA COUNTY REGIONAL WATER PLAN Water Resources Assessment

application to appropriate water is based on nine administrative blocks arranged in a square with three blocks to a side. Each block is a square unit of four sections. The center block of the nine administrative blocks is the block in which the proposed appropriation is to be made. The primary criterion for approval of a new appropriation, aside from impairment, is that each of the nine administrative blocks considered have an existing useful life extending through 2006.

5.3.2.2.3 Declared Ground-water Basin Criteria - Jal Underground-Water Basin

The Jal UWB, in southeastern Lea County, was declared by the NMOSE in 1961. Consideration of applications to appropriate water in the Jal Basin is based on basin quadrants. Water is available for appropriation in those administrative quadrants in which vested and permitted water rights have not reached the administrative limit, provided that there would be no impairment or detriment to existing water rights.

5.3.2.2.4 Declared Ground-water Basin Criteria - Carlsbad Underground-Water Basin

The NMOSE began declaring portions of this UWB in 1947. According to the NMOSE, there are only 12 wells located in that portion of the Carlsbad UWB located within Lea County. These wells are used in oil recovery, and together account for approximately 50 to 100 acre-feet of annual ground-water withdrawal. The NMOSE is developing a new ground-water model for management of the Carlsbad Basin. Currently, the entire Carlsbad UWB is closed to new appropriations.

5.3.2.2.4 Declared Ground-water Basin Criteria - Roswell Underground-water Basin

The NMOSE has no recorded declarations within the portion of the Roswell UWB which lies within Lea County. In addition, the entire UWB is closed to new appropriations.

5.3.2.3 State Case Law Affecting Ground-water in Lea County - Mathers v. Texaco, Inc. - 1966

Mathers v. Texaco, Inc., 77 N.M. 239, 421 P.2d 771 (1966), involved a challenge by several water users to Texaco's application to appropriate ground-water from the Lea County UWB. The New Mexico Supreme Court held in Mathers that the lowering of the water table in any particular amount in a non-rechargeable basin effected by a new appropriation of ground-water does not necessarily constitute impairment of senior water rights. The Court reasoned that the beneficial use by the public of ground-water in a closed or non-rechargeable basin requires giving such use a time limitation. Thus, the rights of the protestants to appropriate water from within the Lea County UWB were subject to this time

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Barr, Phillip
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limitation. The Court held that the lowering of the water level of the protestants' wells, together with increased pumping costs and reduced pumping yields, did not constitute an impairment of the protestants' rights as a matter of law, because these are the inevitable results of the beneficial use by the public of ground-water in a non-rechargeable basin.

5.3.2.4 Impact of State Statutes, Regulatory Policies, and Case Law on the Supply and Demand on Ground-water in Declared Underground Water Basins in Lea County

All of the basins in Lea County are "mined" basins. In addition, the Lea County, Capitan, and Jal UWBs are still open to new appropriations. State statutes and regulatory policies, as discussed in Sections 5.1.2.1 and 5.1.2.2, direct that appropriations in these basins are approved as long as the requested appropriation does not impair existing water rights. Mathers v. Texaco, Inc., however, holds that lowered water levels in wells, increased pumping costs, and reduced pumping yields do not constitute impairment of existing water right holders sufficient to deny an application

5-5 LEA COUNTY REGIONAL WATER PLAN Water Resources Assessment

for a new appropriation of water from a declared underground water basin. Thus, New Mexico State law, along with the New Mexico Supreme Court's decision in Mathers v. Texaco, and the fact that water is not recharged into these basins as quickly as it is consumed, means that Lea County's ground-water supply will likely continue to decline over the next forty years.

Lea County, however, is investigating ways to counteract this projected decline. For example, the Lea County Water Users Association has filed an application with the NMOSE to appropriate any remaining water rights within the Lea County UWB. By filing this application, Lea County is proactively seeking to take control of its ground-water supply so that it can conserve its water supply and have flexibility to efficiently and conscientiously plan for and manage present and future demand for its water supply. In addition, Lea County is investigating methods it can employ to treat poor quality water from the Capitan, Jal, and Carlsbad UWBs and reinject such treated water into the Lea County UWB, and thereby increase the water supply in this basin. Lea County has also requested that the NMOSE close the LEA UWB to new appropriations.

5.3.2.5 Pending Adjudications Affecting Ground-water in Lea County

Approximately 550 square miles in the northern portion of Lea County (see FIGURE 4) has not been declared by the

NMOSE. Appropriation of ground-water in this region is governed solely by the common law doctrine of prior appropriation. No pending adjudications within the Plan area are known at this time. Thus the ground-water in this region may likely be relied upon as a future source of water for Lea County water users.

5.3.3 Legal Issues Needing Resolution

Aside from Lea County Water Users Association's application with the NMOSE to appropriate any remaining blocks within the Lea County UWB, there are currently no legal issues pertaining to Lea County's water supply needing resolution.

5.4 LOCAL CONFLICTS

5.4.1 Oil Production Ground-Water Contamination

Oil production in the plan area involves the use of substantial quantities of brine. Studies have implied there have been cases of ground-water contamination of wells in Lea County caused by brine intrusion and oil seepage Alleged well contamination was also the basis of at least one lawsuit filed in district court in Lea County by a well owner against several oil producers. In addition, there are various know areas of contamination of fresh water by brine water and petroleum products. It has not been proven that well contamination by oil production activities has occurred, however, and, to our knowledge, no judgments against oil producers have been found.

5.4.2 Ground-Water Drawdown

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Barr, Phillip
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The NMOSE predicts significant ground-water depletion in and around municipalities in Lea County over the next 40 years. This drawdown may render existing municipal well fields incapable of providing a sufficient supply of potable water. To the extent that these municipalities seek new appropriations of ground-water, there exists the potential for challenges to the appropriations by other water users. Ground-water depletion throughout the plan area may also lead to legal conflict between appropriators pumping fresh water for secondary recovery of oil or for irrigation water users.

5-6 LEA COUNTY REGIONAL WATER PLAN Water Resources Assessment

5.4.3 Out of County Use

Current and future use and demand for water outside of Lea County not only intensifies the pressure of outside water users to obtain water from Lea County, but it also impacts Lea County's water supply.

An example of outside pressure to obtain water form Lea County occurred in 1997 when the ISC attempted to purchase and retire water rights in the Pecos River system owned by IMC Kallium, a potash mining company. The LCWUA filed a lawsuit against ISC that specifically challenged the Commission's plan to pump water from the Lea County UWB for use in subsidizing the available water in the Pecos River system. The commission ultimately abandoned its plan to retire IMC Kallium water rights.

In 1998, IMC Kallium filed applications with NMOSE seeking licenses to pump an additional 6,000 acre-feet of ground-water per year from the Lea County UWB for use outside of the basin at its potash mining operation in Eddy County, New Mexico. IMC Kallium's applications were protested. IMC Kallium and the LCWUA ultimately entered into a global settlement involving not only these applications, but also IMC Kallium's annual water use appropriations from the Lea County UWB. Under the terms of the settlement, although IMC Kallium has licenses for Lea County UWB water totaling 6,529 acre-feet per annum, it agreed to reduce its usage of water from the Lea County UWB to a maximum of 2,000 acre-feet per year subject to the contingency of an occurrence of legal stoppage or curtailment of water usage by IMC Kallium from its La Huerta Capitan water rights. If such stoppage or curtailment occurs, the annual 2,000 acre-feet maximum from the Lea County UWB may be exceeded by IMC Kallium using its licensed rights only by an amount equal to the loss of water resulting from such stoppage or curtailment of water usage from its La Huerta Capitan water rights and, then, only for the period of time the stoppage or curtailment continues. IMC Kallium withdrew its applications for the additional 6,000 acre-feet and LCWUA has made application for these water rights with NMOSE.

The demand for water along the Texas-New Mexico border has increased significantly and is expected to continue to increase. One reason for the increase in water is that range land in this area is being converted into irrigated land. The water used to irrigate these lands is mined water form the Ogallala Water Basin. Mining water from the Ogallala Water Basin will likely impact Lea County's water supply. Currently there is no legal mechanism to protect underground water basins in New Mexico from mining.

5.4.4 Special Districts

The Soil and Water Conservation District exists within Lea County. Their concerns have been included in the development of this plan.

5-7

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Barr, Phillip
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PC_2084

Levens, Matthew

From: pharb2@msn.com
Sent: Saturday, April 26, 2008 6:59 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Attachments: AF53.jpg; AF83.jpg

AF53.jpg (36 KB)

AF83.jpg (30 KB)

Theodore Wyka:

1|14E1 I believe that nuclear projects should not be allowed in Lea county, New Mexico, because the ogallala aquifer is in decline. The ogallala aquifer is the main source of water in Lea county.
Here is a file from the State of New Mexico engineers office.

Phillip barr
2836 northacres
Hobbs, New Mexico
Lea county

http://www.ose.state.nm.us/water-info/NMWaterPlanning/regions/leacounty/ExecSummary.pdf<http://www.ose.state.nm.us/water-info/NMWaterPlanning/regions/leacounty/ExecSummary.pdf>

This is still another description (from the State of NM link above) concerning the water supply in Lea county,.
Two sections from file then actual file below that

Note the date.From State Record
.

And note this statement from the same record about Closing the basin.

==========
==========

Here is the file
EXECUTIVE SUMMARY

Description of Planning Process

The "Regional Water Planning Handbook", December 1994, provided by the New Mexico Interstate Stream Commission outlines the purpose and method for developing regional water plans for entities within the State of New Mexico. This handbook includes the template that should be followed when completing the water plan. This template lists all of the required elements for a water plan to be considered complete.

1

Barr, Phillip
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The planning process for the completion of the Lea County 40-year Water Plan (Plan) began in September 1998 when the Lea County Water Users Association (LCWUA) awarded the contract to Leedshill-Herkenhoff, Inc. (LHI). John Shomaker & Associates and Montgomery & Andrews, PA have sub-consulted with LHI in development of the Plan.

Four public meetings were held during the planning process of the Plan in different municipalities throughout Lea County. Each meeting was well attended and beneficial to both the consultant team and the communities. Numerous other meetings were held between the consultants, the steering committee, and/or the LCWUA Board of Directors. These meetings were advertised and made open to the public.

1|14E1 Cont... Findings

Water Supply

Ground water resources in Lea County include hydrogeologic strata within five underground water basins declared by the New Mexico Office of the State Engineer (NMOSE). The basins from north to south are the Lea County Underground Water Basin (UWB), a very small portion of the Roswell UWB, the Capitan UWB, the Carlsbad UWB, and the Jal UWB. There are no perennial streams in the County, and surface water is limited to stockponds, playas, and ephemeral drainage.

Ground water in the Lea UWB is present in the Ogallala aquifer, which is part of the High Plains aquifer. Water from the Lea UWB is used for agriculture, domestic, municipal, domestic, livestock, commercial, oil and gas, mining, and industrial purposes. Ground water in the Basin is being pumped out at a faster rate than it is being recharged. Historic water level declines from pumping near Hobbs and along the New Mexico-Texas state line are as great as 50 to 70 feet.

The Jal UWB is the smallest in Lea County, and is the only other basin in the County that provides water for municipal use. The City of Jal is the primary user of water in the Basin. Historic ground water diversions from the Basin have had little impact on water levels, indicating that recharge is about in equilibrium with the amount of water being removed by pumping.

The other UWB's in the County provide water for livestock, domestic, mining, and the oil and gas industry. Water use in these UWB's is fairly limited because aquifers are unable to provide adequate quantities of water to wells for large users, or the water quality is poor.

The annual ground water diversion in Lea County in 1995 was 179,341 acre-feet, the majority of which was from the Lea UWB. Ground water diversions from Lea County are projected to more than double by the year 2040, primarily in response to increased agricultural demands for the dairy industry. While an ample number of water rights exist to meet this projected demand, the reality is there physically not enough water in the Basin to maintain an annual diversion of this magnitude.

Water Demand

The largest type of user of water in Lea County is non-municipal irrigation. The NMOSE has on record a total of 2,007 non-municipal wells with an associated water right of 344,625 acre-feet. The next largest user group is municipalities, with water rights of 48,035 acre-feet.

Water demand in Lea County increased 33% from 1985 to 1995 and is presently about 180,000 acre-feet per year. Similar increases in water use from 1985 to 1995 occurred in Irrigated Agriculture (33%), Public Supply (26%), Domestic (40%), Livestock (106%), and Commercial (21%) use categories. During 1995 to 1998 Industrial use increased 69%. Decreases in water use occurring during 1985 to 1995 in the Mining (-26%) and Power (-22%) categories; these declines are attributed increases to process efficiency. Present water use by category, as a percentage of Lea County's total, is 78% Irrigated Agricultural, 10% for Public Water Supply, 7% Mining, and 3% Power. Present water use by Domestic, Livestock, Commercial Reservoir Evaporation, and Recreation uses are all less than 1% of the total use.

Over the next 40 years -if unrestrained-- the water use in Lea County is estimated to increase to approximately 360,000 acre-feet, 105% greater than the 1995 total; this

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Barr, Phillip
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1|14E1
Cont...

PC_2084

assumes the current CRP acreage returns to irrigated farmland. The largest part of this increase is anticipated to come from Irrigated Agricultural, which is projected to require 290,000 acre-feet in 2040, in response to demands for feed from Lea County's expanding dairy industry. If the current CRP acreage remains fallow, the estimated total annual water use in year 2040 is estimated to be a 340,000 acre-feet per year (of which Irrigated Agricultural will require about 270,000 acre-feet), a 94% increase compared to 1995.

All other water use categories are expected to increase in Lea County over the next 40 years. Specifically, 55% Public Supply, 58% Domestic, 364% Livestock, 58% Commercial, 134% Industrial, 32% Mining, 57% Power, and 55% Recreation are estimated above 1995 uses. These other categories account for a total of approximately 70,000 acre-feet per year of the total annual 2040 estimate.

Water Plan Alternatives

Water plan alternatives for Lea County are intended to accomplish one or more of three things. 1) Conserve water, 2) Develop additional supplies, and 3) Management strategy for all water resources. Water conservation measures which will be evaluated include use of low energy precision applicators for irrigation, soil moisture monitoring, more dryland farming, xeriscaping, installation of low flow plumbing fixtures, implementation of an inclining block-rate rate structure for billing, and public education efforts to encourage water conservation. Methods of developing additional water supplies are development of deep aquifers, treatment of lower quality water, water importation, aquifer recharge, and cloud seeding. A management strategy for all water resources will include trying to get the Lea UWB closed to new appropriations, utilizing a ground-water flow model to predict the impacts from ground water pumping as well as ground water recharge projects, monitoring seasonal water level fluctuations, and monitoring water quality.

Recommended Water Plan for the Region

The recommendations made within this report suggest ways Lea County can become proactive in managing its own water-related issues. The plan notes the supply problems that will occur if the County as whole does not implement a strategy to make their resource last longer. The recommended plan for Lea County involves evaluating the feasibility of the alternatives mentioned above, and implementing the alternatives that will prolong ground water resources in the County.

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Barr, Phillip
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PC_2084

1|14E2

recharge, and cloud seeding. A management strategy for all water resources will include trying to get the Lea UWB closed to new appropriations, utilizing a ground-water flow model to predict the impacts from ground water pumping as well as ground water recharge projects, monitoring seasonal water level fluctuations, and monitoring water quality.

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PC_2084

The annual ground water diversion in Lea County in 1995 was 179,341 acre-feet, the majority of which was from the Lea UWB. Ground water diversions from Lea County are projected to more than double by the year 2040, primarily in response to increased agricultural demands for the dairy industry. While an ample number of water rights exist to meet this projected demand, the reality is there physically not enough water in the Basin to maintain an annual diversion of this magnitude.

Barrett, Floy
Page 1 of 2

Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Dept. of Energy/NNSA
1000 Independence Ave. S.W.
Washington, D.C. 20585

PC_257

RE: Draft Complex Transformation SPEIS Comments

Dear Mr. Wyka:

1|16A I oppose the U.S. having a manufacturing capability for 50-125 nuclear weapons a year at Los Alamos and Sandia National Labs and other sites. I also specifically oppose

2|7N 1|16A (cont) the draft SPEIS "preferred alternative" of having plutonium pit manufacturing and research and development at Los Alamos Lab. The U.S.

3|5C.1 does not need any more plutonium pits, because there are more than 10,000 already stored at the Pantex Plant, in addition to the thousands in existing U.S. nuclear bombs.

4|1F Farther, I oppose our government violating the Nonproliferation Treaty to which the United States is a party. It is U.S. law that any treaty the U.S. signs becomes the Law of the Land. Violating this law becomes an offense of great magnitude. The arrogance of this offense will only make

cont'd.

Barrett, Floy
Page 2 of 2

4|1F
(cont.)

other countries think they need nuclear weapons for their own protection. This will escalate the arms race rather than negotiating effective measures to bring about the cessation of the nuclear arms race as required by Article VI of the Non-proliferation Treaty. I urge the Dept. of Energy & NNSA to work diligently toward nuclear disarmament as required by the treaty the U.S. signed, instead of pursuing this "Complex transformation" and building more nuclear weapons.

Sincerely,
Floy J. Barrett
316 Washington N.E.
Albuquerque, N.M.
87108

Barrett, Lida
Page 1 of 1

PC_2038

Levens, Matthew

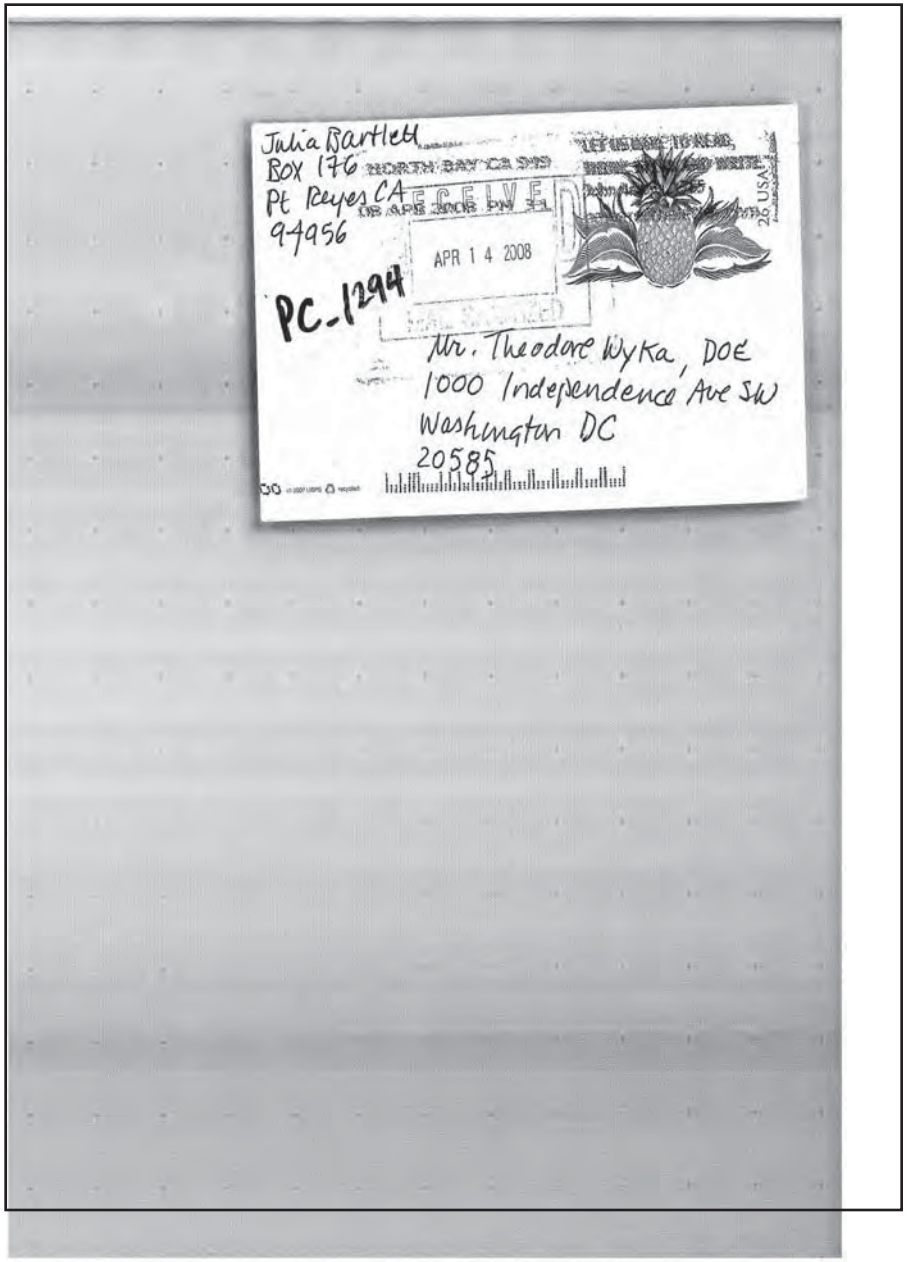
From: lidak@bellsouth.net
Sent: Thursday, April 10, 2008 9:45 AM
To: Complex2030
Subject: NO NEW BOMBS PLEASE

1|1F

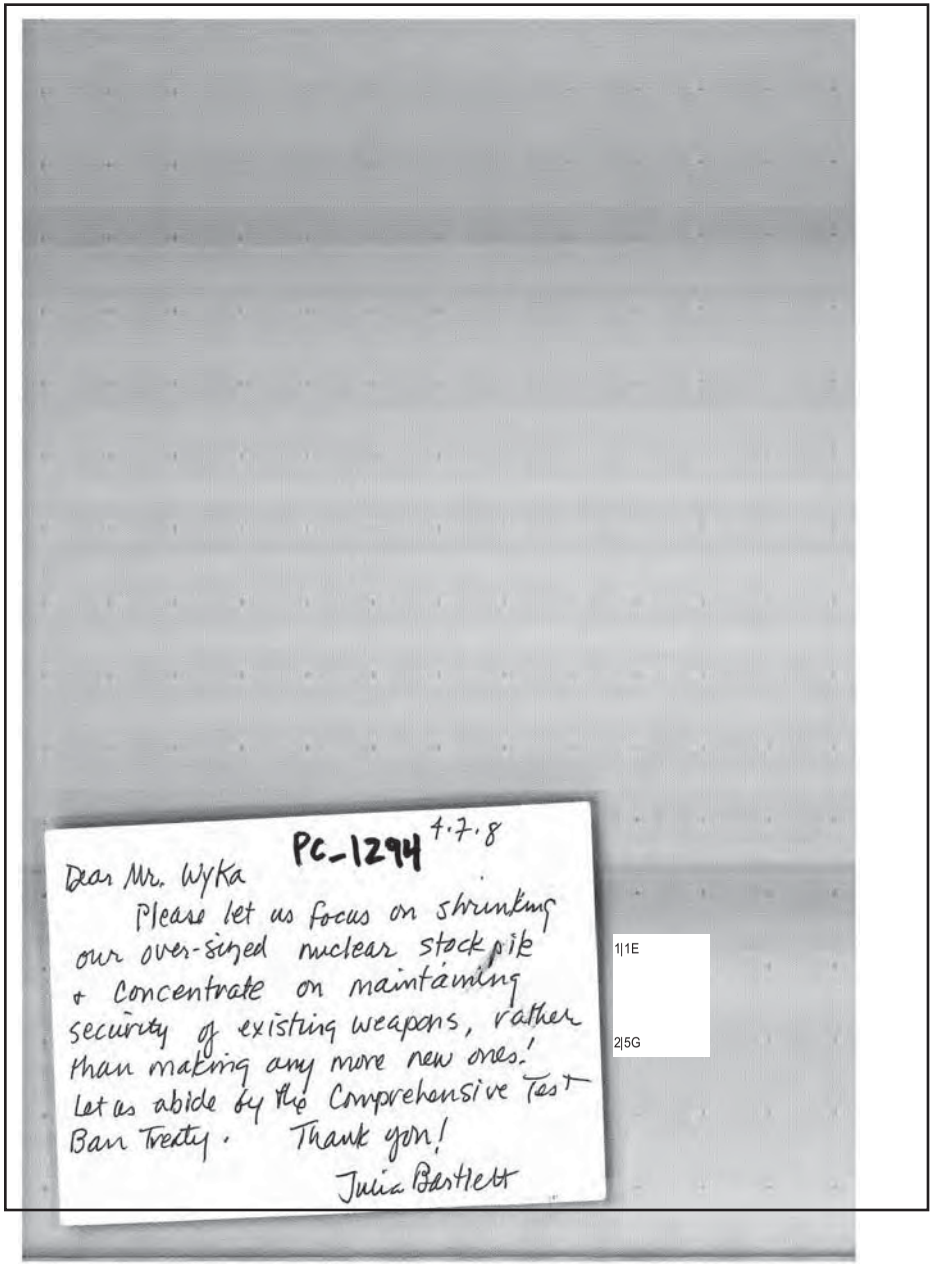
We can't expect others not to build if we keep building.

Lida K. Barrett
1400 Kenesaw Ave. #11S
Knoxville, TN 37919
865-546-8999
lidak@bellsouth.net

Bartlett, Julia
Page 1 of 2



Bartlett, Julia
Page 2 of 2



Bateman, Alfred
Page 1 of 1

PC_356

Levens, Matthew

From: Alfred C. Bateman [abateman@lanl.gov]
Sent: Wednesday, March 12, 2008 12:44 PM
To: Complex2030
Subject: WR Boost Hardware - Question

1|3A I don't have a comment, just a question. Not mentioned in the SPEIS, Sandia Livermore has a team that is responsible for WR gas boost hardware for LLNL weapons. Does the plan have this staying at Sandia Livermore, or will it move to somwhere else? Also there is a similar group (W-7) at LANL (I used to be a member) with a strong track record of successful WR designs of gas boost system hardware. Will it remain, per the plan? Please reply to my e-mail address, abateman@lanl.gov. Thank you.

--Al Bateman

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Bates, Barbara
Page 1 of 1

PC_31

February 15, 2008

Theodore Wyka
Complex Transformation SPEIS Document Manager
us Department of Energy
1000 Independence Avenue SW
Washington, D.C. 20585

Dear Mr. Wyka,

I will be unable to attend the public hearing on February 26, 2008 in Oak Ridge, TN, but this letter will serve as my proxy.

1|16A I find it inconceiveable that the United States Department of Energy has conceived of the need for a new bomb complex (Complex Transformation) as well as the thought of upgrading the current arsenal through Stockpile Life Extension.

2|1F Are we not signators of the Nuclear Nonproliferation Treaty? We must honor our obligations to disarm. The United States as a
3|1J world power is in a unique position to lead the world toward nuclear disarmament. Please don't squander this opportunity.

I would be most interested to attempt to understand the rational behind this proposed project. Please advise.

Sincerely yours,

Barbara Bates Boehler

Barbara Bates Boehler

2947 Mossy Oak Drive
Green Bay, WI 54311
920/460-4120

Bauer, Eric
Page 1 of 1

PC_1965

Buenaflor, Delight

From: Eric Bauer [edbauer@lanl.gov]
Sent: Thursday, April 10, 2008 1:47 PM
To: DIV.Complex.Transformation
Subject: Support for Complex Transformation at Los Alamos

Dear Sir or Madam,

1|16A I am writing to express my support for the Complex Transformation at Los Alamos. This is the best way to reduce our nuclear deterrent, while being flexible enough to respond to any threat to the Nation. I fully support the "preferred alternative" site at Los Alamos as supporting basic actinide science that will continue our "capability-based" workforce, allowing this flexibility that is strongly grounded in solid basic science. In addition, the communities of Northern New Mexico will benefit greatly from the increased revenue and community outreach this project will sustain.

Sincerely,

Eric Bauer

Eric Bauer
Los Alamos National Laboratory
MPA-10:Condensed Matter & Thermal Physics PO Box 1663, Mail Stop K764 Los Alamos, NM 87545
phone: 505-665-0942
fax: 505-665-7652

License Exception: TSPA

1

Bauer, William
Page 1 of 1

PC_784

Levens, Matthew

From: William Bauer [r.b.bauer@comcast.net]
Sent: Tuesday, February 26, 2008 5:49 PM
To: Complex2030
Subject: proposal to restart the U.S.'s nuclear weapons program

William Bauer
2951 Quincy lane
Lansing, MI 48910-2568

February 26, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I am against restarting our nuclear weapons program by the administration's proposal to build a plant to produce plutonium pits for nuclear weapons, and plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal.

2|1J We want restraint in nuclear weapon development in the rest of the world - why not here?

Sincerely,

William Bauer
517-393-5299

Bauknecht, Diane

Page 1 of 1

PC_294

March 17, 2008

Dear Mr. Wyka,

1|16A

Please do everything you can to STOP the Complex Transformation proposed by President Bush & suggest that funding recommended for Complex Transformation be used to remedy our ailing health care system in the US, to upgrade our pathetic education program for America's youth, or to alleviate the plight of the growing number of poor people in our country. Money for those causes would be TRANSFORMATION!

2|9B

Sincerely,
Diane Bauknecht

Bautista, Stacy

Page 1 of 1

PC_1230

Levens, Matthew

From: Stacy Bautista [kant4gethegel@ameritech.net]
Sent: Saturday, March 29, 2008 9:25 AM
To: Complex2030
Subject: Reject "Complex Transformation" plan to build nuclear weapons

Stacy Bautista
1138 W Columbia Ave
Chicago, IL 60626-4520

March 29, 2008

Theodore A Wyka
Complex 2030 SEIS Document Manager
Office of Transformation, U.S. Department of Energy, NA-10.1 1000 Independence Avenue, SW.
Washington, DC 20585

Dear Theodore Wyka:

The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal.

1|16A All environmental considerations aside (which are in no way negligible, but constitute a horrific and irreversible legacy that renders parts of our world unsafe and unfit for human life for the foreseeable future of our species), it is unconscionable to consider "revamping" or expanding a nuclear program aimed at making weapons.

2|9B To create more or new weapons and the capacity to 'revitalize' old ones instead of doing what we can to retire and dispose of them, is immoral. It is politically destabilizing and can only lead to anti-human policies - even if they are never used, the money needed to create them in this country and in all countries that follow our lead, hoping to avoid being victimized by our bombs, could have gone to sustaining and building up political and material infrastructure that supports human life.

1|16A (cont.) Do not accept any proposals to increase nuclear research that is aimed at increasing or 'revamping' our nuclear arsenal.

3|1J By building up its nuclear arsenal right now, the US is essentially telling the world, "Do as I say, not as I do."

Sincerely,

Stacy Bautista

1

Beach, Pamela

Page 1 of 1

PC_1664

Levens, Matthew

From: punknpoco@aol.com
Sent: Saturday, April 05, 2008 4:11 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|3A 2|1B Instead of focusing on increasing the number of nuclear weapons to blow up the world, I would like you to focus instead on maintaining only the weapons that we need to defend ourselves.
And this doesn?t mean euphemisms for increasing that number.

Please include my comment as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project. Thank you. Pamela Beach, Dearborn, MI.

Sincerely,
Pamela Beach
21565 Edison
Dearborn, MI 48124

cc:
Senator Carl Levin
Representative John Dingell
Senator Debbie Stabenow

1

Beach, Sharyn

Page 1 of 1

PC_2106

Levens, Matthew

From: Sharyn and Brian Beach [sampc1@earthlink.net]
Sent: Thursday, April 10, 2008 6:50 PM
To: Complex2030
Subject: No More Weapons

Dear Mr. Wyka,

1|2O I am writing as a deeply concerned citizen of the world. We have engaged in far too much activity that contributes to brutality and violence, and far too little that promotes peace. The truth is, if we want peace, we have to be peaceful. We have been amassing weapons since the beginning of written history and it always gets us to the same place: 2|16A nowhere. If we want things to be different, we must DO SOMETHING DIFFERENT. That is why the proliferation of more bombs is not the arswer.

3|9B Let's direct our resources to more useful purposes. Let's practice peace. Because practice makes perfect.

Thank you,
Sharyn Beach
sampol@earthlink.net

Bean, Kevin
Page 1 of 1

PC_2029

Levens, Matthew

From: kevinbean06@comcast.net
Sent: Thursday, April 10, 2008 6:05 PM
To: Complex2030
Subject: comments on preferred alternative

TO: Theodore Wyka
FROM: Kevin Bean
RE: Comments of NNSA Complex Transformation preferred alternative April 10, 2008

Dear Mr. Wyka:
1|1F; 2|1J These comments expand on verbal testimony I provided at the March 11, 2008 complex transformation hearing in Albuquerque.
The preferred alternative should be rejected because, contrary to NNSA's postion, its implementation would violate the Nuclear Nonproliferation Treaty. The treaty, which was adopted almost forty years ago, directs member nations to pursue “complete disarmament” at “an early date.” As a signatory, the United States of America is obligated under the U.S. Constitution to abide by the treaty, regardless of any countervailing national policies or statutes.
The NNSA says implementation of the preferred alternative would not violate the treaty because the current U.S. president “set the objective of 'achieving a credible nuclear deterrent with the lowest-possible number of nuclear warheads consistent with our national security needs,'” and because the country “has made significant progress toward disarmament.”
This argument would be in error even if all the NNSA was proposing was continuation of the status quo, because after forty years the U.S. is still a long ways from complete disarmament. But the NNSA is actually proposing enhancing the country's nuclear weapons capabilities. Regardless of how such an action is characterized or rationalized or its
1|1F (cont.) near-term results, it indisputably would expand and enhance the country's nuclear weapons production capability and would therefore violate the treaty's disarmament directive.
Even if the U.S. produces no new weapons, other countries would likely follow the U.S. lead by expanding and enhancing their own production capabilities. Moreover, the huge investments required to upgrade production capabilities would further entrench nuclear weapons programs.
11J (cont.) Rather than exacerbating the problem, the U.S. should instead take advantage of this opportunity to make a concerted push for complete disarmament now and for an end to the threat of nuclear annihilation, which is exactly what the Nuclear Nonproliferation Treaty calls for.
In conclusion, adoption of the preferred alternative would violate national and international law and make the world a more dangerous place. The preferred alternative, along with the unconstitutional policies of the current administration, should be
1|1F (cont) scrapped.

1

Beckman-Key, J.
Page 1 of 1

PC_1372

Levens, Matthew

From: J. Beckman-Key [jbeckmankey@hotmail.com]
Sent: Wednesday, February 20, 2008 1:11 PM
To: Complex2030
Subject: NO to Chemistry and Metallurgy Research Replacement

J. Beckman-Key
8003 Downing Street
Austin, TX 78759-4328

February 20, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

2|1J Building this new plant would send a contradictory message to other countries, such as Iran, who may be seeking nuclear weapons. While the U.S. is asking others to forego developing nuclear arsenals, we are simultaneously trying to increase our own capacity to build new nuclear weapons.

1|16A (cont) The CMRR project is an irresponsible new program that Congress should reject.

Sincerely,

J. Beckman-Key

1

Beehan, Thomas
Page 1 of 2

PC_172 NUMBER 2-12-08

Feb 18

RESOLUTION

WHEREAS, the National Nuclear Security Administration (NNSA), a semi-autonomous agency within the DOE was established by Congress in 2000 to manage the nation's nuclear weapons complex; and

WHEREAS, the NNSA operates the Y-12 National Security Complex (Y-12) located in Oak Ridge, Tennessee; and

WHEREAS, Y-12 has a significant economic impact on the region, with over 4,500 employees and subcontractors; procurements worth millions of dollars annually; as well as other spin-off activities; and

1|15A WHEREAS, Y-12's highly trained and talented workforce cannot be easily replicated anywhere in the world; and

WHEREAS, the City of Oak Ridge commends the NNSA for its ongoing efforts to improve operating efficiencies, enhance safety and environmental management programs, and accelerate nuclear weapons dismantlement activities; and

2|16A WHEREAS, an investment in the modernization of nuclear weapons complex will help ensure that vital national security missions are performed in a safe and efficient manner; and

WHEREAS, in accordance with the National Environmental Policy Act (NEPA) of 1969, the NNSA has issued the *Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement (SPEIS) DOE/EIS-0236-S4*; and

3|5D.3 WHEREAS, the purpose of the SPEIS is to evaluate potential impacts associated with the continued transformation of the United States' nuclear weapons complex, including the continued operation and modernization of the Y-12 National Security Complex in Oak Ridge; and

WHEREAS, the NNSA is soliciting comments on the scope of the SPEIS in accordance with the Council on Environmental Quality (CEQ) regulations implementing NEPA and DOE NEPA implementing Procedures; and

WHEREAS, the City of Oak Ridge desires to officially comment to NNSA on the SPEIS; and

WHEREAS, the NNSA's preferred alternative as described in the SPEIS is to pursue a Center for Uranium Manufacturing and R & D at the Y-12 National Security Complex; as such, Y-12 would continue to serve as the primary uranium center providing components and subassembly production, surveillance and dismantlement; and

4|5C.4 WHEREAS, this preferred alternative would build upon the completion of the Highly Enriched Uranium Materials Facility (HEUMF) and consolidating HEU storage in that facility; and

WHEREAS, this preferred alternative would also support the preliminary design of a Uranium Processing Facility (UPF) to consolidate existing HEU contained in legacy weapons, dismantle legacy warhead secondaries, support associated Research and Development, and provide a long term capacity for new secondary production; and

WHEREAS, the location of the UPF at Y-12 is highly desirable and logical, and

WHEREAS, the City of Oak Ridge strongly supports the continued operation of Y-12 and its national security mission, including the safe and secure storage and processing of uranium; and

1|15A (cont.) WHEREAS, the workforce at Y-12 is highly skilled and whose expertise suggest that Y-12 National Security Complex in Oak Ridge should remain the weapons' complex center of excellence for uranium and other special nuclear materials; and

Beehan, Thomas
Page 2 of 2

WHEREAS, the City Manager recommends the transmittal of a resolution endorsing the preferred alternative for the Y-12 National Security Complex as described in the SPEIS as The Center of Excellence for Uranium Manufacturing and R & D at the Y-12 National Security Complex, and as such, Y-12 would continue to serve as the primary uranium center providing components and subassembly production, surveillance and dismantlement; and allow NNSA to proceed with the preliminary design of a Uranium Processing Facility (UPF); and

4|5C.4 (cont.) WHEREAS, the City Manager further recommends that the NNSA locate the UPF at the Y-12 National Security Complex.

NOW, THEREFORE, BE IT RESOLVED BY THE COUNCIL OF THE CITY OF OAK RIDGE, TENNESSEE:

That the recommendation of the City Manager is approved endorsing the preferred alternative for the Y-12 National Security Complex as described in the SPEIS as The Center of Excellence for Uranium Manufacturing and R & D at the Y-12 National Security Complex, and as such, Y-12 would continue to serve as the primary uranium center providing components and subassembly production, surveillance and dismantlement; and allow NNSA to proceed with the preliminary design of a Uranium Processing Facility (UPF).

BE IT FURTHER RESOLVED that the NNSA is urged to locate the UPF at the Y-12 National Security Complex.

BE IT FURTHER RESOLVED that this resolution be transmitted to NNSA as the official comments of the City of Oak Ridge.

This the 18th day of February 2008.

APPROVED AS TO FORM AND LEGALITY:

Kristy R. Kruschenske
City Attorney

Thomas D. Beehan
Mayor

Jacquelyn J. Bernard
City Clerk

Beeny, Diane
Page 1 of 2

PC_1332

Levens, Matthew

From: Diane Beeny [dianeb181@yahoo.com]
Sent: Tuesday, April 08, 2008 2:51 AM
To: Complex2030
Subject: Reject "Complex Transformation" plan to build nuclear weapons

Diane Beeny
181 Tudor Oval
Westfield, NJ 07090-2244

April 8, 2008

Theodore A Wyka
Complex 2030 SEIS Document Manager
Office of Transformation, U.S. Department of Energy, NA–10.1 1000 Independence Avenue, SW.
Washington, DC 20585

Dear Theodore Wyka:

1|16A The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal.

I want to express my complete opposition to the "complex transformation", on both moral and rational grounds.

2|9H Aside from the prohibitive and unnecessaritly exorbitant cost of over 150 billion dollars of the public's tax money that could be used in countless other better and more beneficial ways to actually improve lives...

Aside from the environmental contamination and hazards that the materials, construction, assemblage and storage of such weapons pose to human health and safety...

3|14O Aside from the dangers that the creation and harboring of such destructive weapons pose to not only present but future generations...

4|1J And aside from the risks such weapons hold, whether from either deliberate or accidental release, the temptation they pose for terrorist criminals, or the fact that - rather than serving as a deterrent - they would actually cause other nations to rationalize the need for construction and/or escalation of their own nuclear devices...

5|1F Aside from all of that this program represents a direct violation of both the spirit and letter of the United Nations Non-Proliferation Treaty which the nations of the world negotiated (not easily) but in good faith and high hopes of working towards global DISARMAMENT.

This program not only violates that good faith negotiation, but works to counter and reverse it.

Replacing existing weapons with "newer and updated" nuclear weapons goes completely against the NPT agreement, and sends the wrong message to the rest of the world.

4|1J (cont) This will only escalate a greater arms race, encourage more countries - particularly those with unstable leadership and seeking a voice at the nuclear "table" to acquire such weapons by any possible means.

Construction of such an updated arsenal will only increase tensions and hostilities on our already over-tense and over-heated planet and increase distrust, competion and dis-unity among the nations and people of this world.

And how can the United States ever tell any other nation to reduce their stockpile or not

1

Beeny, Diane
Page 2 of 2

PC_1332

4|1J (cont) to build such weaponry, when we are in the process of constructing our own "updated" models?

It is hypocritical in the extreme and no other nation will take such talk seriously if we continue to do the opposite of what we dictate to others.

For the sake of sanity, for the sake of global concordance, and for the sake of all future generations - for your children and grandchildren and - hopefully - THEIR children and grandchildren...

...And for the sake of our beautiful planet...

I beg you to turn away from this course and instead work towards TRUE global disarmament and the creation of a truly safer and more secure world for everyone...

...And in hopes of a future era of peace rather than the final peace of post-nuclear obliteration and horror.

For the the sake of us all, I surely do hope that you will choose the former.

If you do, perhaps future generations will bless you.

If you choose the latter course there may be NO future generations to remember you or anything at all. Is that what you want??!

Please choose wisely. I do hope with all my heart that you will.

Thank you.

By building up its nuclear arsenal right now, the US is essentially telling the world, "Do as I say, not as I do."

Sincerely,

Diane Beeny
908-233-7344

2

Beigel, Lynda
Page 1 of 1

PC_614

Levens, Matthew

From: Lynda Beigel [beigel@znet.com]
Sent: Tuesday, March 11, 2008 10:17 PM
To: Complex2030
Subject: beigel@znet.com

Lynda Beigel
80 Wharf Road
Bolinas, CA 94924

March 11, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1| 14M.3 Unlike the president, I remember what the effects not only on Hiroshima and Nagasaki, but also on our scientists (who almost all died of leukemia from working with radioactivity) and the Hibakusha were and still are. I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons. The folks in central Washington state and in the deserts of the southwest as well as the sea life in south Florida and elsewhere have reason to fear current, let alone increased Nuclear production!

2|1J I am also opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal. I understand that the Chemistry and Metallurgy Research Replacement (CMRR) project would be able to produce 50 to 80 plutonium pits annually, the first major nuclear warhead production since the end of the Cold War. Would our Gulf War veterans want this? I doubt IT!Building this new plant

3|16A would send a contradictory message to other countries, such as Iran, who may be seeking nuclear weapons. While the U.S. is asking others to forego developing nuclear arsenals, we are simultaneously trying to increase our own capacity to build new nuclear weapons.Congress was right to rebuke the Energy Department's last attempts to upgrade the arsenal The CMRR project is another irresponsible new program that should be rejected.

Sincerely,

Lynda Beigel
415 868-1949

1

Beke, Maya
Page 1 of 1

PC_1620

Levens, Matthew

From: itsmebeke@aol.com
Sent: Saturday, April 05, 2008 10:41 PM
To: Complex2030
Subject: Revise the Complex Transformation SPEIS

Administrator Thomas P. D'Agostino
National Nuclear Security Administration Department of Energy Washington, DC 20585

Dear Administrator D'Agostino,

1|16A Please, please. I am only 16 years old and I am so concerned with the issue you have raised. I can do nothing but beg you to revise your draft plan in order to reduce and hopefully eliminate America's nuclear weapons arsenal.

2|2O I doubt you will even get to read this, or let alone WANT to read this, but you should take this into consideration if you do in fact get to read this or any other letter sent by another concerned individual.

Sincerely,

Maya Beke
13024 Bourne Place
Bristow, VA 20136

1

Belcastro, Frank
Page 1 of 1

PC_1750

Levens, Matthew

From: frank belcastro [fbelcast@hotmail.com]
Sent: Friday, March 28, 2008 10:51 PM
To: Complex2030
Subject: Stop new nukes

frank belcastro
285 north grandview avenue
dubuque, IA 52001-6327

March 28, 2008

Complex Transformation

Dear Complex Transformation:

1|16A 2|1J I am opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal.

3|2O To make a difference in global climate change, we would have to immediately build as many nuclear power plants as we already have in the U.S. (about 100) and at least as many as 2,000 worldwide. Wall Street won't invest in nuclear power because it is too risky. The partial meltdown at Three Mile Island taught investment bankers how a two-billion-dollar investment can turn into a billion-dollar clean-up in under two hours. So we, the people, would have to foot the bill. Still, the biggest stumbling block, where climate change is concerned, is that it takes a decade or more to construct a nuclear plant, even if the permitting process goes smoothly, which it often does not.

4| 14M.3 Yet when it comes to the mining of uranium, you need to picture fossil-fuel-intensive carbon-emitting vehicles, and lots of them, used to do the mining. The Navajo are fighting right now to prevent uranium mining from resuming on their land, which was severely contaminated by the postwar uranium boom of the 1940s and 1950s. The miners got lung cancer.
The children in the area got birth defects and a 1,500 percent increase in ovarian and testicular cancer. And the slag heaps and contaminated pools that were left behind will be radioactive for millennia.

5|9A We should spend the billions proposed for this plan on programs to eliminate nuclear weapons.

Sincerely,

frank belcastro

1

Belisle, Mavis
Page 1 of 3

PC_418

Peace Farm Comments related to: DOE/EIS-0236-S4

General Comments

1|10.F.2 DOE/NNSA is basing its approvals for current and future operations at the Pantex Plant on a previous environmental impact study that is out of date [*Document Citation*: *Continued Operation of the Pantex Plant and Associated Storage of Nuclear Weapons Components* (ROD published in 62 FR 3880, January 27, 1997)]. It does not currently reflect

- the current footprint of the operational area of the Plant,
- accurate boundaries of the Plant, given current access and adjacent land purchase activities underway by Pantex,
- the existing facilities on-site, given that buildings have been decommissioned and demolished and others constructed,
- technologies that have come into existence in the past approximately 13-years, and
- the nature of security in a post-9/11 world.

2|14.E.1 DOE/NNSA has failed to justify the selection of the Pantex Plant for its Plutonium Consolidation proposal given the fact that groundwater is a finite regional resource that is currently being mined from the Ogallala Aquifer in the Texas Panhandle region. Thus, the water resources required for this project is unreliable in the long-term.

Open-air Burning and Open-air Detonation

3|14.D.2 Open-air burning and open-air detonation at Pantex and all other DOE/NNSA sites should not occur. The environmental impacts for open-air burning and open-air detonation have not been evaluated and reported (for example, plume and/or dispersal air modeling have not been conducted for these operations).

DOE/NNSA did not explore any alternative to either open-air burning or open-air detonation. If no technologies currently exist as an alternative, DOE/NNSA should so state.

Pit Storage Concerns

4|2.I.1 The goal of pit storage and disposition is to provide an environmentally safe and secure pathway, and facilitate minimal transportation needs and minimal worker exposures when pits must be moved for evaluation or other activities. In contrast, plutonium disposal through MOX would result in substantial risks during transportation to workers and the public. Workers would be exposed during loading, unloading, and during transportation. In addition, conversion of plutonium to MOX will create additional risks and exposures and environmental contamination. Thus, DOE/NNSA should revisit and reconsider plutonium immobilization and/or vitrification as part of the plutonium consolidation process.

1

Belisle, Mavis
Page 2 of 3

Peace Farm Comments related to: DOE/EIS-0236-S4

4|2.I.1 (cont.) Any use of plutonium for nuclear power by utility companies increases the accessibility of nuclear sources to terrorists.

5|5.N.2 Is the proposed pit storage facility to be constructed underground? Details seemed sketchy. If not, how will the new storage facility address safety and security issues? These concerns have not been addressed.

Pits remaining in storage at Pantex

Consolidation of pits in storage in a new facility in Zone 12 provides some safety and security benefits, but has the potential to increase other risks. The location would place additional mounds of plutonium in the proximity of operations to which it was more distant when stored in Zone 4.

5|5.N.2 (cont.) If, on the other hand, new environmentally safe and secure facilities were built in Zone 4, there would be the opportunity to open Zone 4 to international inspections as current international treaties require, without exposing assembly/disassembly and other routine activities at the Plant to additional security risks.

Pits kept at the site should be made as difficult as possible for reuse, which would minimize efforts for terrorists to acquire these pits. Examples are _____. DOE/NNSA did not examine methods that would make the nuclear materials undesirable to terrorist threats.
DOE/NNSA did not consider any of these reasonable alternatives for storage and disposition, and should do so now.

Other Unanswered Questions

6|6.E Is some or all of the proposed "environmental testing" for new sites potentially more damaging to the environment than the environmental testing that has been conducted previously at other sites?

Unfunded Environmental Liabilities

2|14.E.1 (cont.) DOE/NNSA has deprived the public of the use of its natural resource due to contaminated groundwater that has resulted from past Pantex operations and waste management methods. The public loss of its groundwater carries with it a financial liability under CERCLA (Natural Resource Damage Assessment) and DOE/NNSA should disclose its estimates for this future liability at Pantex and other sites.

For example, Pantex acknowledges that its groundwater will be contaminated for more than 100 years. Also, a document titled **Pantex Plant FY 2006-2015 Ten-Year Comprehensive Site Plan** acquired under the Freedom of Information Act disclose DOE/NNSA estimates for Pantex future environmental liabilities. This information should be included in the PEIS.

2

Belisle, Mavis
Page 3 of 3

Peace Farm Comments related to: DOE/EIS-0236-S4

Groundwater

2|14.E.1 (cont) Although DOE/NNSA states that its water needs from the region's sole source aquifer is miniscule relative to that used by agriculture and the City of Amarillo, the Ogallala Aquifer is a finite resource and current use is not sustainable.

While agricultural uses could respond rapidly to groundwater declines and rising energy costs, the DOE/NNSA operations at Pantex Plant lacks that flexibility, especially given the enormous investment of public funds in the approved and formalized procedures of operations and in construction of the proposed facilities, not to mention the ones already in existence.

3

Bell, Jim
Page 1 of 1

PC_1100

Levens, Matthew

From: Jim Bell [jimbellelsi@cox.net]
Sent: Thursday, March 27, 2008 1:43 PM
To: Complex2030
Subject: Eliminate nuclear weapons

Jim Bell
4862 Voltaire St.
San Diego, CA 92107-2108

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A No more nuclear weapons.

Sincerely,

Jim Bell

1

Bellin, Peter
Page 1 of 1

PC_1835

Levens, Matthew

From: Peter Bellin [pbellin@dslextreme.com]
Sent: Friday, March 28, 2008 12:12 AM
To: Complex2030
Subject: Bush Administration Plans to develop new weapons

Peter Bellin
706 Cornwall Drive
Oxnard, CA 93035-1233

March 28, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|1J I feel that the US should set an example and reduce its commitment to nuclear weapons. I have heard that the Bush administration proposed to build a plant at Los Alamos to fashion plutonium for nuclear weapons.

I fail to understand how the US can condemn the plans of other nations to develop nuclear weapons at all, while enhancing the weapons we continue to hold and stockpile. Further, this administraion seems ready to develop new nuclear weapons.

I know that I can count on your support in the effort to stop this program, and prevent the development of these new weapons.

Sincerely,

Peter Bellin

1

Belson, Paul

Page 1 of 1

PC_1494

Levens, Matthew

From: Paul Belson [paulbelson@yahoo.com]
Sent: Saturday, April 19, 2008 9:47 PM
To: Complex2030
Subject: Draft Complex Transformation SPEIS Comments

Dear Mr. Wyka,

1|1F The Draft SPEIS does not thoroughly examine all reasonable alternatives for the planning horizon of 2030. The Draft SPEIS fails to present an alternative in which the United States implements the Nuclear Non-Proliferation Treaty by eliminating its nuclear weapons arsenal. This is arguably the most reasonable alternative and yet the Draft SPEIS does not consider the alternative.

The NNSA should begin an aggressive reduction and elimination of nuclear weapons. During the scoping process a substantial number of public comments requested that the NNSA present a nuclear disarmament option. A thorough re-evaluation would conclude that it is in the interest of the United States to pursue a world free of nuclear weapons. The DOE should focus on maintaining a safe, secure, and credible nuclear deterrent while supporting efforts to eliminate these weapons globally, and on dismantling warheads and safely securing weapons-grade materials. The United States should NOT pursue new nuclear weapons.

2|1J I want my government to be a leader in the world promoting a future free of nuclear weapons. The United States should act from courage not fear. The year 2030 should be free of nuclear weapons. I live near LANL (Los Alamos) and I want to see such facilities put their talent to peaceful pursuits that will better humanity. Further, DOE should completely clean all facilities around the country. It is unconscionable that funding is not allocated for clean up.

3|14M3 The clear fact that there is no solution for assured safe (for all!) disposal of nuclear waste makes the conclusion that nuclear technology should not be pursued simple and final.

The United States must not make more nuclear weapons!

Paul Belson
P.O. Box 708
Los Alamos NM 87544 USA

Be a better friend, newshound, and know-it-all with Yahoo! Mobile. Try it now.

Bendib, Khalil

Page 1 of 1

PC_1904

Levens, Matthew

From: kbendib [kbendib@sbcglobal.net]
Sent: Thursday, April 10, 2008 12:38 AM
To: Complex2030
Subject: Comment from Berkeley-based editorial cartoonist Khalil Bendib

Attachments: 108. Seven Generations.jpg

108. Seven
erations.jpg ((

"Dear Mr. Wyka,
1|2O Attached please find my comment
on the Draft Complex
Transformation Supplemental Environmental Impact Statement.
It is a comment in the form of a political cartoon and I hope that you will post it along
all other comments.
Best regards,
Khalil Bendib

1

Benson, Jody
Page 1 of 2

PC_1455

Buenaflor, Delight

From: Jody Benson [bensonj@lanl.gov]
Sent: Monday, April 07, 2008 1:29 PM
To: DIV.Complex.Transformation
Subject: comments for Complex Transformaion

(I was unable to send this through your webpage. The following are my comments on the Complex Transformation SPIES.)

I support several aspects of the new Complex transformation:

1. Reducing the number of nuclear weapons facilities,
2. Expanding LANL's supercomputing capability,
3. Supporting LANL as the center for effective integration of experiments with exceptional theory, modeling, and high-performance computing, and interdisciplinary excellence in theory, modeling, and simulation with experimental science,
4. Radiation-monitoring systems in Russia and key borders
5. MaRIE's global climate-modeling capabilities

I also support using the amazing intellectual talent that could be harnessed for solving huge problems that actually threaten the Earth and it's population-climate change, for example, and developing alternate energy sources

1|15A

However, this is the third time NNSA has proposed that LANL become the new pit facility. Although the plan is getting more reasonable (reducing production from 420 to 80/yr), we still must ask, on whom would these weapons be used? The current war is on terrorism. Terrorism is an ideology, not a place. What location would we bomb to force the terrorists to surrender?

2|10

Since 2003, the current administration has created a doctrine for the use of nuclear weapons that includes "use of nuclear weapons to preempt an attack by a nation or terrorist group that has (or appears to have) weapons of mass destruction," as well as the option of using nuclear arms to destroy known enemy stockpiles of nuclear, biological or chemical weapons.

In January 2005: "The chairman of the Joint Chiefs of Staff issued Global Strike Joint Integrating Concept, Version 1, for conducting global strike operations during the 'seize the initiative' phase of a conflict ('seconds to days'). Targets include WMD production, storage, and delivery capabilities, critical command and control facilities, anti-access capabilities (radars, surface to air missile sites, theater ballistic missile sites), and adversary leadership."

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Benson, Jody
Page 2 of 2

PC_1455

It is THIS administration, the first in American history, that has stated the US will use nuclear weapons in a preemptive strike. It is THIS administration that has destroyed America's stature and prestige as the world leader in standards from moral, technical, and intellectual, to quality of life.

3|1K

THIS administration is on its way out. Do not fund a project that is the pet of an exiting president.

The goals of Complex Transformation are only the goals of a lame-duck administration, and not those of Americans, let alone, the world. Do not fund this project now. Wait at least until America decides whether it prefers to fund bombs over other programs.

Nuclear weapons will not destroy terrorists; rather, the heat and fire that comes with the use of such weapons that kill civilians and destroy economies are the incubators of terrorism. We STILL do not want pit production at Los Alamos.

4|16A

2

Berde, J
Page 1 of 2

3/18/08

CARSON FOREST WATCH
P.O. Box 15
Llano, NM 87543

PC_296

US Dept. of Energy -
Draft Complex Transformation SPEIS Comments

On behalf of our citizens group in rural TAOS County New Mexico, the following are comments:

1) We do not support manufacture of Plutonium Pits at Los Alamos National Lab.

1|16A

2) We do not support any continued Nuclear Weapon Research or Development at LANL - due to on-going contamination of air, Soil and water - both from past and current programs at LANL.

3) This contamination has migrated to the Rio Grande and the Sangre de Cristo Mountains. Water, air, and Soil in these areas have shown levels of numerous Radioactive & heavy metal & Solvents above EPA Standards.

2|14M.2.3|14O

4) We are organic farmers and livestock growers and are concerned regarding migrating contaminants. →

The Relationship Between Humans and Land

Land, then, is not merely soil; it is a fountain of energy flowing through a circuit of soils, plants, and animals. . . . An ethic to supplement and guide the economic relation to land presupposes the existence of some mental image of land as a biotic mechanism. We can be ethical only in rela-

Berde, J
Page 2 of 2

5) Current waste Storage Sites at LANL are not adequate nor are being cleaned up at legally required times.

2|14M.2(cont.)

6) Because of past waste continuing to leak and migrate into Soils air and water far beyond LANL's Boundaries -
We do not support any further nuclear Weapon Programs at LANL.

4|7J

7) Efforts must greatly be redirected to environmental clean-up and restoration.

8) There is a New Mexico State ordered legal Settlement agreement for clean-up that is not being met. Funding needs to be increased to address this needed clean-up.

5|9B

We do not support expanded operations at LANL -

1|16A(cont.)

and many of my neighbors have Serious health effects from past employment at LANL.

5|9B(cont.)

Please re-direct efforts for Clean-up and Restoration and Renewable Energy Programs.

Sincerely, J. Berde - Director
Carson Forest Watch Citizen's Group

Berg, Joanne
Page 1 of 1

PC_1899

Levens, Matthew

From: joanne miriam berg [cherkassiya@aol.com]
Sent: Thursday, February 21, 2008 1:35 AM
To: Complex2030
Subject: No more nuclear weapons

joanne miriam berg
1501 Blake Street #205
Berkeley, CA 94703-1885

February 21, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A; 2|2O The U.S. should not build any new nuclear weapons or launching devices or "triggers" What the world needs now is for the United States and other countries to dedicate themselves to dismantling nuclear weapons -- the prospect of a nuclear war is too horrendous to conceive No one on earth is so evil that they need to be fried by a nuclear blast

miriam berg

Sincerely,

joanne miriam berg

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Berg, Patricia
Page 1 of 1

PC_1490

Levens, Matthew

From: Patricia Berg [rivercrittergreen@yahoo.com]
Sent: Monday, April 21, 2008 1:19 PM
To: Complex2030
Subject: Defense

Patricia Berg
2429 Sutton, 3S
St. Louis, MO 63143-2024

April 21, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons, and all the further necessities such a commitment would involve.

Such an effort would be extremely expensive. That is the first reason for me that makes it ridiculous.

1|16A The more we spend on war effort of any sort, including more weaponry, and the less we spend on domestic needs the less we are truly self defended.
Iraq has proven this.

We have no real defense left, just a lot of debt which will be passed on to future generations. Now we need to get back to the needs of our own, including the multitudes of injured soldiers.

Loving human kindness is the only way to proceed in a global culture that has been so contaminated by greed, mostly ours. The price of food is currently in an upward spiral world wide. In Thailand rice farmers are using armed guards to protect their fields.

Help bring us back into the fold of good Samaritans, and out of the morass of bad actors. Vote no on nuclear weapon expansion.

Sincerely,

Patricia M. Berg
314-646-1508

1

Bergier, Kim
Page 1 of 4

Wednesday, February 20, 2008 3:20 PM Roman Bergier 248-545-7871 p.01

PC_21

To: Theodore Wyka
Complex Transformation SPEIS Document Mgr.
U.S. Department of Energy
1000 Independence Ave. S.W.
Washington D.C. 20585
Fax: 1-703-931-9222
E-mail: complextransformation@nnsa.doe.gov

Re: "Draft Complex Transformation SPEIS Comments."

Dear Mr. Wyka: 2/18/2008

Thank you for your letter of December 21, 2007 inviting us, as "interested party", to submit comments on "Complex Transformation's Supplemental Programmatic Environmental Impact Statement" (SPEIS, DOE/EIS-0236-S4).

1|14O The process of building any nuclear weapon is a danger to our environment, and to the workers, especially when there are leaks of toxins like mercury and radiation. Have you looked at the threat to the local environment during the process of building a whole new complex for "refurbishing" nuclear weapons? Have you also looked at the potential of ultimate destruction of most of the life on our beautiful and fragile earth if nuclear weapons are ever used, either by accident or intent?

2|7J Even if they are, miraculously never used as weapons, the waste problems of nuclear weapons have never been solved, nor have issues around the transportation of radioactive materials. Can you give a 100% guarantee that the nuclear weapons

3|14N production facilities now, or in this new plan, are able to withstand natural disasters such as earthquakes, tornados or lightening, without spewing radiation and other toxic

4|13A chemicals into the environment, especially the ground water? What would happen if a few terrorists flew planes into buildings with enriched uranium, like at Y-12?

5|1J. Then there are issues around U. S abiding by the Non-Proliferation Treaty. The U.S. has no moral or legal ground to stand on to tell any other country that they cannot have Weapons of Mass Destruction (WMD) when the Bush administration is building new usable nuclear weapons, with the intentions to use them against named countries, some of them non-nuclear! The Bush administration's "Nuclear Posture Review" states potential targets of Iraq, Iran, N. Korea, Syria, Libya, Russia and China. With international emphasis to end WMD's the U.S. must abide by the Non-Proliferation Treaty and eliminate its own WMD to regain its credibility. Especially considering that U.S. has more nuclear weapons than the rest of the world combined; if we claim to be the world's "Number One Superpower" then it is up to us to set the example to the rest of the world of the abolition of nuclear weapons.

On a personal note: I visited Hiroshima only 18 years after the U.S. dropped the "Little Boy" bomb. In June of 1963 my family stayed with Rev. Tanimoto and met with several "Hibakusha" (survivors of the atomic bombs on Hiroshima and Nagasaki). It was

Bergier, Kim
Page 2 of 4

Wednesday, February 20, 2008 3:20 PM Roman Bergier 248-545-7871 p.02

shocking for me to see the devastation, especially to learn how quickly these beautiful cities were destroyed and how many people are still suffering from the radiation from these Weapons of Mass Destruction. Rev. Tanimoto's Methodist Church stood in ruins and can be seen in the photograph taken a month later and published in National Geographic August 1995. I saw victims, whose burn scars were still red, learning how to sew on sewing machines especially designed to accommodate their unique disabilities. There was no insurance of course. To my knowledge, as a former staff of an insurance networking company, there is NO insurance that will cover any of us in the case of a nuclear accident or act of war. Hospitals where I have worked (in Sevierville, TN and Grass Valley, CA) are totally unprepared for even a limited nuclear accident.

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Many people from Michigan have become increasingly committed and thus have made several trips to OREPA Actions, for a total of around 420 individual trips. From Michigan there have been twenty-one arrests while committing acts of civil resistance at the gate of Y-12. Considering it's around an 18 hour round trip from Detroit, MI, I feel this is a testimony to the increasing dedication of those who are committed to spreading the movement to stop nuclear weapons, especially at Y-12.

I will be driving a van full of Michigan citizens to the DOE public hearing in Oak Ridge, TN on February 26th, so I hope to meet you there.

6|16A I look forward to hearing from you that the decision makers will take the wiser route of listening to the leaders in the attached collection of quotes and not issue a clearance of environmental impact for building "Complex Transformation".

Sincerely,

Kim Joy Bergier

Kim Joy Bergier
25720 Miracle Drive
Madison Heights, MI 48071-4111

Fax: 248-545-7871

Michigan Liaison for Stop The Bombs Campaign
MISTBC@comcast.net

Bergier, Kim
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Wednesday, February 20, 2008 3:20 PM Roman Bergier 248-545-7871 p.04

Barack Obama's Plan

From: http://www.barackobama.com/issues/foreignpolicy/

On Nuclear Weapons

- **A Record of Results:** The gravest danger to the American people is the threat of a terrorist attack with a nuclear weapon and the spread of nuclear weapons to dangerous regimes. Obama has taken bipartisan action to secure nuclear weapons and materials:
  - He joined Senator Dick Lugar in passing a law to help the United States and our allies detect and stop the smuggling of weapons of mass destruction throughout the world.
  - He joined Senator Chuck Hagel to introduce a bill that seeks to prevent nuclear terrorism, reduce global nuclear arsenals, and stop the spread of nuclear weapons.
  - And while other candidates have insisted that we should threaten to drop nuclear bombs on terrorist training camps, Obama believes that we must talk openly about nuclear weapons – because the best way to keep America safe is not to threaten terrorists with nuclear weapons, it's to keep nuclear weapons away from terrorists.
- **Secure Loose Nuclear Materials from Terrorists:** Obama will secure all loose nuclear materials in the world within four years. While we work to secure existing stockpiles of nuclear material, Obama will negotiate a verifiable global ban on the production of new nuclear weapons material. This will deny terrorists the ability to steal or buy loose nuclear materials.
- **Strengthen the Nuclear Non-Proliferation Treaty:** Obama will crack down on nuclear proliferation by strengthening the Nuclear Non-Proliferation Treaty so that countries like North Korea and Iran that break the rules will automatically face strong international sanctions.
- **Toward a Nuclear Free World:** Obama will set a goal of a world without nuclear weapons, and pursue it. Obama will always maintain a strong deterrent as long as nuclear weapons exist. But he will take several steps down the long road toward eliminating nuclear weapons. He will stop the development of new nuclear weapons; work with Russia to take U.S. and Russian ballistic missiles off hair trigger alert; seek dramatic reductions in U.S. and Russian stockpiles of nuclear weapons and material; and set a goal to expand the U.S.-Russian ban on intermediate- range missiles so that the agreement is global.

Bergier, Kim
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Wednesday, February 20, 2008 3:20 PM Roman Bergier 248-545-7871 p.03

A few great quotes to consider:

"We seek the elimination one day of nuclear weapons from the face of the Earth."
***Ronald Reagan**, Inaugural Address, January 21, 1985*

"I call upon the scientific community in our country, those who gave us nuclear weapons, to turn their great talents now to the cause of mankind and world peace." ***Ronald Reagan***

"Today I can declare my hope, declare it from the bottom of my heart, that we will eventually see the time when the number of nuclear weapons is down to zero and the world is a much better place."
***General Colin Powell**, Secretary of State, and Former Chairman of the Joint Chiefs of Staff, 6-10-93*

"I have said publicly no option should be off the table, but I would certainly take nuclear weapons off the table,... This administration has been very willing to talk about using nuclear weapons in a way we haven't seen since the dawn of a nuclear age. I think that's a terrible mistake." ***Hillary Clinton***

"Finally, if we want the world to deemphasize the role of nuclear weapons, the United States and Russia must lead by example. President Bush once said, The United States should remove as many weapons as possible from high-alert, hair-trigger status - another unnecessary vestige of Cold War confrontation. Six years later, President Bush has not acted on this promise. I will. We cannot and should not accept the threat of accidental or unauthorized nuclear launch. We can maintain a strong nuclear deterrent to protect our security without rushing to produce a new generation of warheads."
Barack Obama

"I propose we cut the number of our nuclear devices from the more than 10,000 we have to a couple hundred. Such a unilateral action would establish the United States' credibility to then ask other nations, including our enemies who would then feel less threatened, to join our efforts in ridding the world of unneeded and dangerous nukes. This would set the stage for us to convene a global conference to write a new nuclear non-proliferation treaty. What I propose is to jumpstart what was agreed to in the Nuclear Non-Proliferation Treaty in 1970 and extended in 1995 by all five permanent members of the UN Security Council, the original Nuclear Club (the US, Russia, China, Great Britain, and France) -- they agreed to reduce and eventually eliminate their nuclear arsenals."
Mike Gravel

"We can't even take off the table that we might use a nuclear first strike to go after Iran. They don't even have a weapon and our CIA says they probably can't get one for 10 years. And even if they did have one, what are they going to do with it? Are they going to attack us? They wouldn't do that. Yet at the same time we stood up against the Soviet system. They probably had 30,000 nuclear warheads and they had the capability of launching missiles at us. We didn't have to have a nuclear war to finally win the cold war. We talked to them and there were negotiations." ***Ron Paul***

"Getting all nations to agree to a stronger nonproliferation regime will require skillful diplomacy and new thinking. Which brings me to the second task: the nuclear states must stop making new weapons and must reduce the size of their existing arsenals. The Non-Proliferation Treaty commits non-nuclear states to forego nuclear weapons, and it also commits the nuclear weapons states to the goal of nuclear disarmament. To get others to take the NPT seriously, we need to take it seriously ourselves." ***Bill Richardson***

Bergier, Kim
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PC_584

Levens, Matthew

From: Kim Bergier [MISTBC@comcast.net]
Sent: Wednesday, February 20, 2008 3:01 PM
To: Complex2030
Subject: Draft Complex Transformation SPEIS Comments

Importance: High

Attachments: A few quotes to consider.doc; Complex Transformation SPEIS Comments- Kim's.doc

A few quotes consider.doc

Complex ormation SPE

To: Theodore Wyka
Complex Transformation SPEIS Document Mgr.
U.S. Department of Energy
1000 Independence Ave. S.W.
Washington D.C. 20585
Fax: 1-703-931-9222
E-mail: complextransformation@nnsa.doe.gov

Re: ``Draft Complex Transformation SPEIS Comments.''

Dear Mr. Wyka:

Thank you for your letter of December 21, 2007 inviting us, as "interested party", to submit comments on "Complex Transformation's Supplemental Programmatic Environmental Impact Statement" (SPEIS, DOE/EIS-0236-S4).

1|14O The process of building any nuclear weapon is a danger to our environment, and to the workers, especially when there are leaks of toxins like mercury and radiation. Have you looked at the threat to the local environment during the process of building a whole new complex for "refurbishing" nuclear weapons? Have you also looked at the potential of ultimate destruction of most of the life on our beautiful and fragile earth if nuclear weapons are ever used, either by accident or intent?

2|13A.1 Even if they are, miraculously never used as weapons, the waste problems of nuclear weapons have never been solved, nor have issues around the transportation of radioactive materials. Can you give a 100% guarantee that the nuclear weapons production facilities now, or in this new plan, are able to withstand natural disasters such as earthquakes, tornados or lightening, without spewing radiation and other toxic chemicals into the environment, especially the ground water? What would happen if a few terrorists flew planes into buildings with enriched uranium, like at Y-12?

3|1F Then there are issues around U. S abiding by the Non-Proliferation Treaty.
The U.S. has no moral or legal ground to stand on to tell any other country that they cannot have Weapons of Mass Destruction (WMD) when the Bush administration is building new usable nuclear weapons, with the intentions to use them against named countries, some of them non-nuclear! The Bush administration's "Nuclear Posture Review" states potential targets of Iraq, Iran, N. Korea, Syria, Libya, Russia and China. With international emphasis to end WMD's the U.S. must abide by the Non-Proliferation Treaty and eliminate its own WMD to regain its credibility. Especially considering that U.S. has more nuclear weapons than the rest of the world combined; if we claim to be the world's "Number One Superpower" then it is up to us to set the example to the rest of the world of the abolition of nuclear weapons.

On a personal note: I visited Hiroshima only 18 years after the U.S. dropped the "Little Boy" bomb. In June of 1963 my family stayed with Rev. Tanimoto and met with several

Bergier, Kim
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"Hibakusha" (survivors of the atomic bombs on Hiroshima and Nagasaki). It was shocking for me to see the devastation, especially to learn how quickly these beautiful cities were destroyed and how many people are still suffering from the radiation from these Weapons of Mass Destruction. Rev. Tanimoto's Methodist Church stood in ruins and can be seen in the photograph taken a month later and published in National Geographic August 1995. I saw victims, whose burn scars were still red, learning how to sew on sewing machines especially designed to accommodate their unique disabilities. There was no insurance of course. To my knowledge, as a former staff of an insurance networking company, there is NO insurance that will cover any of us in the case of a nuclear accident or act of war. Hospitals where I have worked (in Sevierville, TN and Grass Valley, CA) are totally unprepared for even a limited nuclear accident.

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(Note that he has written a letter to you as well.)

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I will be driving a van full of Michigan citizens to the DOE public hearing in Oak Ridge, TN on February 26th, so I hope to meet you there.

I look forward to hearing from you that the decision makers will take the wiser route of listening to the leaders in the attached collection of quotes and not issue a clearance of environmental impact for building "Complex Transformation".

Sincerely,

Kim Joy Bergier
25720 Miracle Drive
Madison Heights, MI 48071-4111

I will also fax this from: 248-545-7871

Michigan Liaison for Stop The Bombs Campaign MISTBC@comcast.net

Bergier, Kim
Page 3 of 5

PC_584

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Bergier, Kim
Page 4 of 5

PC_584

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Complex Transformation SPEIS Document Mgr.
U.S. Department of Energy
1000 Independence Ave. S.W.
Washington D.C. 20585
Fax: 1-703-931-9222
E-mail: complextransformation@nnsa.doe.gov

Re: ``Draft Complex Transformation SPEIS Comments."

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Bergier, Kim
Page 5 of 5

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Kim Joy Bergier
25720 Miracle Drive
Madison Heights, MI 48071-4111

Fax: 248-545-7871

Michigan Liaison for Stop The Bombs Campaign
MISTBC@comcast.net

Bergier, Kim
Page 1 of 3

PC_1537

Levens, Matthew

From: Sherry, Ted (2T5) [sherrytd@yso.doe.gov]
Sent: Thursday, May 01, 2008 5:29 PM
To: mistbc@comcast.net; Complex2030
Cc: Wyatt, Steven L (YSO)
Subject: RE: 'Unexpected thermal reaction' in can of enriched uranium (around 80 cans at Y12!)

Ms. Bergier,

Thank you for your note and concern related to Frank Munger's article. I will briefly answer your three questions below.

1. Were any employees injured from around 80 cans of stored briquettes of enriched uranium having gone through a thermal reaction?
2. How much radiation may have been leaked into the surrounding environment?
3. In particular, would anyone living or working in Oak Ridge be endangered?

1. No employees were injured or received any radioactive exposures due to the small thermal events with these containers containing enriched uranium. The containers which had lids lift were inside another container and no contamination has yet to be detected outside the outer container. Even if there had been contamination external to the container, all conservative precautions were taken to protect the workers.
2. No release occurred to the environment.
3. No one in Oak Ridge was endangered.

1|15A I personally am responsible for the safe operation of this facility and the protection of our workforce, environment, and surrounding community. My family and I live in Oak Ridge and have two young children in schools here. I am perfectly confident in the safety of our site. Thank you for your concern.

Ted Sherry

From: mistbc@comcast.net [mailto:mistbc@comcast.net]
Sent: Wednesday, April 30, 2008 4:27 PM
To: Theodore Wyka
Cc: Sherry, Ted (2T5)
Subject: 'Unexpected thermal reaction' in can of enriched uranium (around 80 cans at Y12!)

Dear Ted Wyka,

I know you must be overwhelmed with comments especially today as it's the deadline.
As I've already e-mailed you and made my statement at the Y-12 noon hearings on 2/26, I only have this article to add, along with the questions I've posed to Ted Sherry, Y12 Manager.

This is to alert you to this new safety concern.
1|7F Plus how important it is for the focus to be on securing the storage of enriched uranium.
2|13A; 316A As well as the clean up and dismantling of nuclear weapons so the need for more enriched uranium is no longer needed.

Thank you,
I look forward to reading the results of all your study on the over 85,000 comments, and trust you too will conclude in OREPA's No Production Alternative.

Kim Bergier
25720 Miracle Drive, Madison Heights, MI 48071-4111

Bergier, Kim
Page 2 of 3

PC_1537

---------- Forwarded Message: ----------
From: mistbc@comcast.net
To: sherrytd@yso.doe.gov (Ted Sherry)
Subject: Can you answer my questions about 'Unexpected thermal reaction' in can of enriched uranium (around 80 cans at Y12!)
Date: Wed, 30 Apr 2008 19:15:08 +0000
Ted,
I met you, briefly, at the DOE/NNSA hearings on 2/26/08 for Complex Transformation at Y-12 New Hope Center.
As I was posting an article to Knox News on Frank Munger's blog I noticed this article he posted on 4-24-08.
Note that at the bottom I posted these comments, so wonder if you can answer my questions.

This doesn't sound good!
Were any employees injured from around 80 cans of stored briquettes of enriched uranium having gone through a thermal reaction?
How much radiation may have been leaked into the surrounding environment?
In particular, would anyone living or working in Oak Ridge be endangered?

Thank you,
Kim Bergier, from near Detroit, Michigan

4|14K

'Unexpected thermal reaction' in can of enriched uranium

A **March 28 memo** from Defense Nuclear Facilities Safety Board staff stationed at Y-12 noted there was a reaction in a can used to store briquettes of enriched uranium.

Operators first identified a lid "raised above the normal seated position." The cans are used to store the uranium later used in casting operations.

A formal investigation is under way.

According to the board memo, following the initial incident, "Operators then identified a can (inside a steel lockbox) with material that appeared to have gone through a thermal reaction. Ash was observed around the can and heat discoloration was noted on the can and inside the lockbox."

It later was found that about half of the 160 storage cans in the area had lids lifted from their normal position.

Steven Wyatt, a spokesman in the NNSA's site office at Y-12, said today, "B&W Y-12 is methodically investigating all aspects of why an unexpected, small-scale thermal reaction in a briquette can occurred. Final determinations as to the cause or causes have not been determined. One area we are reviewing is the use of a new, environmentally friendly solvent to clean metal chips in the manufacturing process."

Another potential culprit, according to the defense board memo, could be the time in storage.

The briquettes are made from chips of enriched uranium pressed together. The report said "briquettes are placed individually into zip-lock bags and two briquettes are

Bergier, Kim
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PC_1537

typically stored in a can. The can loading is performed in an inert atmosphere."

Posted by Frank Munger on April 24, 2008 at **5:46 PM**

Comments

This doesn't sound good!
Were any employees injured from around 80 cans of stored briquettes of enriched uranium having gone through a thermal reaction?
How much radiation may have been leaked into the surrounding environment?
In particular, would anyone living or working in Oak Ridge be endangered?
Thank you Frank, for your coverage!
Kim

Posted by: **Kim Bergier** at **April 30, 2008 1:11 PM**

See actual article and to respond at:
http://blogs.knoxnews.com/knx/munger/2008/04/unexpected_thermal_reaction_in.html

Bernal, Adrian
Page 1 of 1

PC_1920

Levens, Matthew

From: adrian bernal [adrian_bernal_2001@yahoo.com]
Sent: Wednesday, April 30, 2008 12:29 PM
To: Complex2030
Subject: opposition to the savannah river site plans

Dear Sirs:
1|16A; 2|10H I am opposed to making changes at the Savannah River Plant that might result in making more nuclear weapons.
The site should be used to dismantle these weapons and not to make new ones.
thanks,
Adrian Bernal

Bernard, Larry
Page 1 of 2

PC_590

Levens, Matthew

From: Larry Bernard, O.F.M. [larbernard@cybermesa.com]
Sent: Tuesday, February 12, 2008 6:10 PM
To: Complex2030
Cc: marylia@earthlink.net; lcdofm@hotmail.com; 'John and Phyllis Antonio'; 'Joan Brown'; 'Jim Hoffman'; 'JPIC'
Subject: Comment on "Complex Transformation"

Saint Joseph Church
St. Joseph Blvd. at Capital Dr.
P. O. Box 1000, Laguna, New Mexico 87026-1000 (505) 552-9330
email larbernard@cybermesa.com

February 12, 2008

Mr. Ted Wyka NA-101
U.S. Dept. of Energy
1000 Independence Ave., SW
Washington, D.C. 20585
complextransformation@NNSA.DOE.gov

Dear Mr. Wyka:

I am a member of the Franciscan Order of missionaries and serve as pastor of two mission parishes here in New Mexico where I have eight churches under my care. I am also connected to Tri-Valley Cares, the Los Alamos Study Group, Physicians for Social Responsibility, Union of Concerned Scientists and Peace Action. As a pastor and member of these other groups I am always concerned about the well-being of our people. Indeed, I believe our Creator loves all the people He has created and desires that we live in peace as His one family sharing one beautiful planet, which we may rightly call Mother Earth. I recognize the ecological interconnectedness of us all, so that if one suffers, all suffer. And so,

I write now to give my comments on the proposed "Complex Transformation."

1|1F The plan, if implemented, will result in new capabilities and new infrastructure to make new nuclear weapons. Such a plan bespeaks an ongoing, aggressive nuclear posture. Under Article VI of the nuclear Non-Proliferation Treaty, the United States is obligated "to pursue negotiations in good faith on effective measures relating to

Bernard, Larry
Page 2 of 2

2|14M.3 PC_590

cessation of the nuclear arms race at an early date and to nuclear disarmament and on a Treaty on general and complete disarmament under strict and effective international control." "Complex Transformation." flies in the face of this treaty and the demands of ethics, not to mention morality. I do not want a smaller, safer, less expensive nuclear weapons complex, rather, I want none at all. There is enough radioactivity in our world environment. We need less not more.

The "Complex Transformation" plan locks in nuclear weapons as permanent U.S. tools of fear, oppression and empire. I believe and state that this is the wrong direction for our nuclear policy. Our goal should be to dismantle all nuclear weapons, assisting Russia and others to dismantle their own and allow for mutual inspection policies.

As a country founded to bring people freedom, we are to promote dialog, true democracy and respect for all people. We do not need any, let alone more or upgraded nuclear weapons. Even the so-called "tactical" nuclear weapons are still weapons of mass destruction and must not be developed. "Complex Transformation" will not promote a spirit of mutual respect and the brotherhood of nations. Rather, it promotes the self-centered and indeed short-sighted goals of one nation, in an era when the whole world is realizing how it is interconnected and in danger of catastrophe. Empires always bring forms of repression and always generate opposition.

3|9B We will produce more jobs and give ourselves a better feeling in our stomachs if we use the money proposed for this project on matters of justice for all: e.g., developing, financing, distributing, installing renewable energy sources for us at home and for the suffering around the world, assisting the water poor areas of the world to develop healthy water supply and distribution systems, empowering the many who are so eager but so unable to study, promoting water-conserving, organic farming techniques, etc.. I can never forget Pope Paul VI short but powerful words, "If you want peace, work for justice."

Sincerely,

Rev. Larry Bernard, O.F.M.

2

Bernardo, Phyllis
Page 1 of 1

PC_318

Phyllis Bernardo
2763 Culver Road
Rochester, N.Y.
14622

March 26, 2008

Mr. Theodore Wyka
Complex Transformations SPEIS Document Mgr.
U.S. Dept. Of Energy
1000 Independence Ave. S.W.
Washington, D.C. 20585

Dear Mr. Wyka,

1|14O I am a Sister of Mercy, and I have just learned that your department has plans to refurbish the U.S. nuclear weapons-building capacity through the Complex Transformation program – with great expense and with great detriment to the Earth - - producing more toxic substances. – potentially producing more destruction.

2|1F This is a violation of the Nuclear Nonproliferation Treaty.
Do not let this happen. Do not grant environmental clearance.
Let the United States lead other nations in disarmament.
Thank you.

Phyllis M. Bernardo

Bernbeck, Lois

Page 1 of 1

PC_1792

Levens, Matthew

From: Lois Bernbeck [lbernbeck@tds.net]
Sent: Sunday, April 06, 2008 3:21 PM
To: Complex2030
Subject: Nuclear Weapons

Lois Bernbeck
1230 Gammon Rd
Middleton, WI 53562-3806

April 6, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A We need more diplomacy not more nuclear weapons. We keep telling other countries they cannot have any nuclear weapons. And we, who have the most nuclear weapons, want to make ours better. This is not nuclear deterrance. It is just lighting the flames of nuclear war. We were starting to decrease the number under Clinton and that has stopped. Now we are building up more. This is the wrong policy. Please do not fund any attempt to upgrade the nuclear arsenal.

Sincerely,

Lois
608 831 2397

1

Berry, Karl

Page 1 of 1

PC_1634

Levens, Matthew

From: KARL@FREEFRIENDS.ORG
Sent: Saturday, April 05, 2008 7:52 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|16A We need fewer nuclear weapons, not more. Please don't waste our resources developing them.

Sincerely,
karl berry
88609 wickizer ln
bandon, OR 97411

cc:
Senator Ron Wyden
Representative Peter DeFazio
Senator Gordon Smith

1

Besold, Bobbe

Page 1 of 1

PC_1287

Levens, Matthew

From: Bobbe Besold [bobbebird@gmail.com]
Sent: Tuesday, April 29, 2008 7:37 PM
To: Complex2030
Subject: Proposed Complex Transformation

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager,
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, D.C. 20585

Dear Mr. Wyka,

1|16A New Mexico has long been the dumping ground for weapons development and testing. Quite frankly, we have had more than our share. Your current proposed Complex Transformation that you seem to want to bully through, is simply not acceptable. The "No Action Alternative" is the only respectful alternative option to follow at this time, since congressional races are coming up and the outcome will
2|11A install a new political landscape in New Mexico. A new President will write a new Nuclear Posture Review. It is very unwise for NNSA to begin to embark upon a project of such magnitude at such an unstable time in our politics, environment and economy.

3|7J The only "Action Alternative" that will benefit the well being and safety of the citizens of New Mexico, and the only one that we support is the is "Fence to Fence Clean Up". This is the "Action Alternative" requested by the New Mexico Environment Department. Please respect our right to live and raise our children in a clean, healthy place.

Sincerely,

Bobbe Besold
302 Lomita St
Santa Fe, NM 87505

Bettice, Jerry

Page 1 of 1

PC_1115

Levens, Matthew

From: JudyJerry Bettice [jbettice@eartlink.net]
Sent: Thursday, April 03, 2008 6:33 PM
To: Complex2030
Subject: NNSA Proposal

To: Theodore Wyka
Complex Transformation SPEIS Document Mgr
US DOE

Dear Sir:

1|1J It is time for the United States to live up to its commitments for nuclear disarmament. We need to reduce our stockpile and avoid any new developments that increase its size or its capacity. Our aggressive posture in proposing to build new bombs or to retool for the next decades may not give our children many or any decades to live through.
2|16A Proliferation of our arms leads to proliferation of other nations and rogue groups who are attempting to go nuclear. Now is the time for abolition of nuclear arms. As a resident of the State of Tennessee I am dead against the life extension program for the Y12 plant in Oak Ridge. Our government must close dowr operations there and assist those employed in this dangerous nuclear game to find work that supports them in that process or in endeavors that promote global peace rather that global suicide. We the people do not want
3|9A to see our money wasted on more arms when there are so many pressing needs in our midst already.

Thank you for your attention to this matter.

Respectfully,
Jerry Bettice
4043 Allison Avenue
Memphis, TN 38122

jbettice@earthlink.net

Beziat, Pamela
Page 1 of 1

PC_184

DRAFT PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT
SPEIS HEARINGS -- FEBRUARY 26, 2008, OAK RIDGE, TN

1|16A I am here for two reasons: first to ask you to not build this bomb-making plant and second, I am here in response to a challenge issued by Assistant Attorney General Sandra Donaghy of the Anderson County Criminal Court in Clinton, Tennessee. I am a sixty-two year old grandmother and a hospice nurse. In October 2007, I served twenty-two days of a thirty day jail sentence in the Anderson County Detention Facility for peaceably assembling at the gate of the Y-12 bomb making plant in August 2006. During the August 2007 jury trial, I was found guilty of obstruction of roadway along with a priest and a minister. Prosecutor Donaghy asked me if I had tried other ways of registering my protest to building and using nuclear weapons ... perhaps ... writing letters to the editor, speaking or writing to congressional representatives, or speaking directly to the National Nuclear Security Administration regarding their plans to build a new bomb production facility in Oak Ridge. So, I would like to thank Assistant Attorney General Donaghy for encouraging me to address you directly.

2|7M.1 The Anderson County jail has not deterred me from speaking out against nuclear weapons or from civilly resisting a government bent on the insanity of producing and using nuclear weapons. Simply put, if they are built, they will be used. I am here to tell you that my children, my beautiful granddaughter, and certainly the world's children do not need another bomb-making plant.

3|14O
4|9B Think of your own children and grandchildren and what you are leaving to them: a country deplete of the financial resources for their health and for their education, an environment devastated by nuclear waste, and a world community more dangerous than we have ever known before.

Look into your hearts and the hearts of your children and DON'T DO THIS !!

Thank-you,

Pamela Beziat

Pamela Beziat
1827 Morena Street
Nashville, TN 37208
615-341-0255

Bhakti, Sara
Page 1 of 1

PC_1852

Levens, Matthew

From: sarabhakti@yahoo.com
Sent: Sunday, April 06, 2008 5:12 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

I am writing to express my opinion, during the Public Comment Period, on the Department of Energy "Complex Transformation."

I am very concerned about and opposed to any research, development, and/or manufacture of new types of nuclear weapons.

16A I am opposed to any Complex Transformation that undermines U.S. efforts to stop the spread of nuclear weapons around the world.

Please do not put in place policies that would provoke a nuclear arms race. That would violate the Comprehensive Test Ban Treaty and send the wrong message to the world.

Thank you for including my comment as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project.

Sincerely,
Sara Bhakti
521 7th Ave
Kirkland, WA 98033

cc:
Senator Patty Murray
Representative Jay Inslee
Senator Maria Cantwell

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Bhurshan, J
Page 1 of 1

April 14, 2008

PC_933

Dear Mr. Wyka,

1|2E | Please extend the comment deadline of April 10th + consider this comment.

The proposed Bomb plex is not a in the interests of the U.S. For one thing the U.S. needs To honor it's commitment to the

2|1F | N.P.T. Anything less is betrayal to the worlds deepest desires for an end To war + its terrible costs. The U.S. needs To "keep its word" plain + simple. We agreed To the N.P.T. + That is that!

Thank you.

Sincerely,

J. LaVerde-Bhushan
3838 Maynard Pl.
Palo Alto, CA. 94306

Bier, Deborah
Page 1 of 1

PC_384

Levens, Matthew

From: Bier, Deborah A (2ZH) [bierd@y12.doe.gov]
Sent: Wednesday, February 27, 2008 3:29 PM
To: Complex2030
Subject: Preferred Alternative Plan

1|15A | To whom it may concern:
I support the Preferred Alternative Plan. I have worked for B&W Y-12 for a little over a year. I enjoy the work and the people are great. I feel we help make a difference with the work we do.
Thank you for what you do for our country.

Deborah Bier (Debbie) 2ZH
Public Affairs and Communications
New Hope Center
602SCA, N1.102
MS8225
Phone: 241-9374

1

Biernot, Marilyn

Page 1 of 1

PC_2054

Levens, Matthew

From: Marilyn Biernot [mbiernot@east-shina.k12.mi.us]
Sent: Wednesday, April 30, 2008 3:46PM
To: Complex2030
Subject: public comment

1|9-1 I am writing to say I do not want any of my tax money or government monies to be spent on nuclear proliferation. Stop the madness now. Spend our money on cleaning up the environment, not destroying the earth we live on. I want to see this world stay here in existence and not be polluted by plutonium, stronium, uranium, and any other radioactive waste or byproduct of the nuclear industry. I am a NO NUKE POWER person.
Marilyn Biernot
mbiernot@ecsd.us

Binder, Madeline

Page 1 of 1

PC_2049

Levens, Matthew

From: Madeline Binder [thegoodlife@comcast.net]
Sent: Thursday, April 10, 2008 12:57 PM
To: Complex2030
Subject: comments on complex transformation - SPEIS

Importance: High

1|16A To Whom It May Concern:

I strongly oppose to any creation of atomic nuclear bombs.

Respectfully, Madeline Binder

Binkley, Thad
Page 1 of 1

PC_212

Thad L. Binkley
4132 Cristobal Way
Pleasanton, CA 94566

4 March 2008

Mr. Ted Wyka
U.S. Department of Energy NA-101
Complex Transformation Comment
1000 Independence Avenue SW
Washington, DC 20585

Dear Mr. Wyka:

1|16A I oppose the Department of Energy's "Complex Transformation" plan.

2|1F Instead of revitalizing the nuclear weapons complex and building new bomb plants, the U.S. should fully comply with the Nuclear Non-Proliferation Treaty and honor our disarmament obligations.

1|16A (cont.) 3|7J 4|7E 2|1F (cont) I call on you to:

- Reject "Complex Transformation"
- Stop nuclear pollution and weapons
- Enhance our collective global security and
- Support non-proliferation and disarmament.

We need a new nuclear policy, not new nuclear bombs.

Sincerely,

Thad L. Binkley

Binnie, Alan
Page 1 of 1

PC_1514

Levens, Matthew

From: Robert Binnie [albinnie@yahoo.com]
Sent: Wednesday, February 20, 2008 1:03 AM
To: Complex2030
Subject: Nuclear non-proliferation

Robert Binnie
8945 N Shadow Mountain Drive
Tucson, AZ 85704-6737

February 20, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|1J I am very strongly opposed to the new proposal to build a plant to produce plutonium parts for new nuclear weapons.

Building this plant would send a message to the rest of the world that the United States is more interested in maintaining our overwhelming nuclear domination than global nonproliferation.

I urge you to oppose building this new plant.

Sincerely,

Alan Binnie
520-575-9286

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Bissell, Cara
Page 1 of 1

PC_398

Levens, Matthew

From: Cara Bissell [cabissell@fastmail.fm]
Sent: Wednesday, January 16, 2008 12:11 PM
To: Complex2030
Subject: Citizen Comment regarding SPEIS, Complex Transformation

Mr. Wyka:

1|16A I support reducing to elimination nuclear weapons everywhere in the world starting with the United States. The following paragraphs I agree with. Additionally, there should be no use of any "tactical" nuclear arms program that "renders a small area uninhabitable for a thousand years" as was taught in the late 1960s at a Air Force ROTC class at Ohio State University I personally attended regarding a "neutron bomb". Work using non-military means is crucial.

2|1J **** Disarming nuclear potencial everywhere is necessary starting with us, the country with the most devestating power in the world. It is time for the United Nations and its' statutes and "The Peace Corps Model" to be used as tools increasing peace & esteem for all nationally as well as internationally.

3|9B The decision to transform the U.S. nuclear complex must reflect the will of the American people, 79% of whom want that the U.S. to do more to eliminate nuclear weapons. Simply put, the Department of Energy should be putting their resources into nuclear cleanup and "green" energy research, not expanding their weapons program.

4|8A; 5|5C.1 It is particularly disturbing that, in the face of Congress' recent rejection of the Reliable Replacement Warhead program, the SPEIS still refers to a goal of creating 120-125 new warheads every year. These new warheads are not only unwanted, they are also unnecessary. Last year, the Jason's reported that the current U.S. nuclear stockpile will be remain reliable for at least another 70 years.

6|1C 7|14M.3 8|9H There is no reason to rush into a costly new program to build unnecessary and unwanted nuclear weapons ? especially before congressional and administration mandated nuclear policy reviews are completed. With so many unresolved issues around nuclear waste, storage, employee safety and compensation and popular will for reducing nuclear weapons it doesn't make sense for U.S. taxpayers to invest in a new generation of nuclear weapons facilities.

Cara Bissell
3561 9 Street
Long Island City, NY 11106

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Bixby, Robert
Page 1 of 2

PC_1205

Levens, Matthew

From: Robert Bixby [rbixby@earthlink.net]
Sent: Thursday, March 27, 2008 12:16 PM
To: Complex2030
Subject: we need to let nuclear weapons go obsolete

Robert Bixby
3413 Wilshire
Greensboro, NC 27408-2923

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A Bush plans to create more plutonium to trigger nuclear weapons, or to be used as the explosive. It's a very dirty element and we need to let it die out rather than create fresh plutonium. We need to let the nuclear weapons and facilities for manufacturing them go obsolete and disappear through attrition.

It is not just a problem with creating a very long lasting heavy-metal poison that remains in the environment for thousands of years, nor just a problem with creating additional weapons capable of detroying whole cities and millions of lives with a single explosion.

It is a wrong-headed approach to defense.

It is said that the generals are always fighting the last war, and there can be no clearer example of this. Nuclear weapons would be effective in wiping out, for example, a manufacturing area where war materiel is created, or a fleet of large ships like battleships and aircraft carriers.

What likely opponent in war does the United States have that is likely to have city-sized manufacturing plants for war materiel? What likely opponent would have a large fleet or task force of battleships or aircraft carriers?

2|1B Our current foes are individuals or small cells of insurgents likely to use tools readily available to deny the use of a given area or to cause destruction similar to leveling the world trade center. Our current foes might drop inexpensively purchased poison from small planes rented on the spot. They might use electrical switches and jumpers to shut down a subway system or a regional commuter rail. They might set off explosives near levees during a large hurricane. Nuclear weapons would be useless against any of these activities. We need to deal with these issues with foreign policy, foreign aid, and a stronger dedication to global justice, along with surveillance, trained watchmen and women, and hardened systems.

3|14M.3 Furthermore, increased manufacturing of nuclear weapons will ensure that there will be much radioactive waste lying around, whether collected in vulnerable sites like Yucca Mountain, or (more likely) left around the manufacturing plant. These materials can easily be stolen, ground up, and spread by pedestrians, from the windows of cars and trucks, or from rented small planes to deny access to large areas of cities, military bases, or troublesome spots like the capitol, your neighborhood, your home town, bridges and access roads, islands, isthmuses, and so on. Creating more nuclear weapons essentially places a powerful weapon in the hands of our enemy while making us no safer from them.

4|1K Most of the security and defense plans of the republicans have been pinheaded at best, moronic and self-defeating at worst. This plan falls into the latter category. Clearly (and I'm sure you will agree with me) republicans are too corrupt, too perverted and obsessed with having sex with animals, children, parents, and close relatives, burning

Bixby, Robert
Page 2 of 2

PC_1205

4|1K (cont) down churches, destroying the environment, and melting the polar ice caps to prevent me allowed within a mile of the centers of power again. With God's help, we will destroy the republican party and imprison its leaders in the coming months and years. I only hope we can find a place nasty enough to deport them to. Iraq springs to mind. But in the meantime, we have to blunt the worst instincts of these traitors and saying no to George Bush's latest flight of moronity is a good place to start.

Thank you for your help.

Sincerely,

Robert Bixby
336 282 9754

Bixby, Robert
Page 1 of 2

PC_1667

Levens, Matthew

From: rbixby@earthlink.net
Sent: Saturday, April 05, 2008 10:48 AM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|15A The DOE should be commended for proceeding with plans to reduce the facilities, workforce, and redundant capabilities within the nation's sprawling nuclear weapons complex.

2|3A However, its so-called "Complex Transformation" puts far too much emphasis on restoring the capability to research, develop, and manufacture new types of nuclear weapons.

Despite its lack of even the ghost of a nuclear adversary, the United States maintains thousands of nuclear weapons and has thousands more in storage, far more is needed to maintain a credible nuclear deterrent for the foreseeable future. We simply do not need the capability to make more or newer nuclear weapons.

3|1J In addition, Complex Transformation undermines U.S. efforts to stop the spread of nuclear weapons around the world. It violates the spirit and letter of the Comprehensive Test Ban Treaty and sends the wrong message to the world --that obtaining nuclear weapons will increase security.

4|1C Any major upgrade of the nuclear weapons complex must be preceded by a comprehensive analysis and re-evaluation of the role of nuclear weapons as an instrument of security policy.
That review needs to be done by the president and the Department of Defense, not the DOE, and Congress has already mandated that the next president undertake one.

5|11B Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE should focus on shrinking the still-oversized nuclear weapons complex and on maintaining the safety and security of our existing weapons arsenal as the size of our nuclear stockpile is reduced.

3|1J (cont) 6|13A1 There is an aphorism that says "the generals are always fighting the last war." The generals are still thinking we need "mutually assured destruction" with a top-heavy nuclear power like the Soviet Union. But there is no such power in the world today. Every trillion dollars we sink into creating new nuclear bombs is wasted. Everyone agrees our future enemies are likely to be small cadres of secret agents infiltrating the nation and causing sabotage such as seen on 9/11. Every decade or so, a group of militants attacks New York City in order to demonstrate our vulnerability. They've plotted to flood Manhattan's tunnels, destroy Manhattan's bridges, and blow up the Statue of Liberty, which stands in New York harbor. People die in these demonstrations, but the real point is to make people feel violated and to destroy large, visible symbols of American strength and invulnerability. Let us imagine that it is the morning of 9/11. You have learned that terrorists have commandeered four airliners and are headed for major cities on the East Coast. You have in your control a trillion dollars worth of refurbished fission and fusion bombs--enough to destroy all life on earth and continue bombing until nothing is left but rubble. How will you apply those weapons to the problem? Blow up New York? Blow up Washington? Blow up Baghdad? Kabul? Riyadh?
Mecca and Medina? Nuclear weapons are worse than useless against our future and present enemies--they distract us from the real fight, they suck up cash that should be spent on disarmament and catching terrorists, and they give a false sense of security to the frightened illiterates that compose the GOP.

Bixby, Robert
Page 2 of 2

PC_1667

3|1J (cont) 7|9B Let the nuclear weapons become obsolete. Put the trillions into inspecting to make sure no other nation is building them.

I ask that you include my comment as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project.
Thank you.

Sincerely,
Robert Bixby
3413 Wilshire
Greensboro, NC 27408

cc:
Senator Richard Burr
Representative Brad Miller
Senator Elizabeth Dole

2

Blackburn, Clair
Page 1 of 2

PC_1310

Levens, Matthew

From: Clair Blackburn [clairblackburn@gmail.com]
Sent: Thursday, April 17, 2008 6:57 PM
To: Complex2030
Subject: Tonopah Test Range
Attachments: TTR Location Location Location.pdf

I did not receive a response and I'm using my personal e-mail address.

I still would like to help if possible.

Clair Blackburn
P.O. Box 109 Tonopah, NV 89049

---------- Forwarded message ----------
From: Blackburn, Clair
Sent: Monday, March 24, 2008 8:34 AM
To: 'complextransformation@nnsa.doe.gov'
Subject: Tonopah Test Range

March 24, 2008

Ted Wyka
NNSA
Office of Transformation NA-10.1
100 Independence S.W.
Washington, DC 20585

Dear Mr. Wyka,

1|10E I made a map for you to look at that should play a big part in the decision as where we should do testing.

When we need to do remote testing with the best location Tonopah Test Range will be here to do that job.

2|15A I support Commissioner Eastley and hope she will be able to give you the information needed about Tonopah, Nevada.

I have lived in Tonopah for over 15 years and plan to help the Tonopah Chamber of Commerce all I can.

If I can help in any way please let me know.

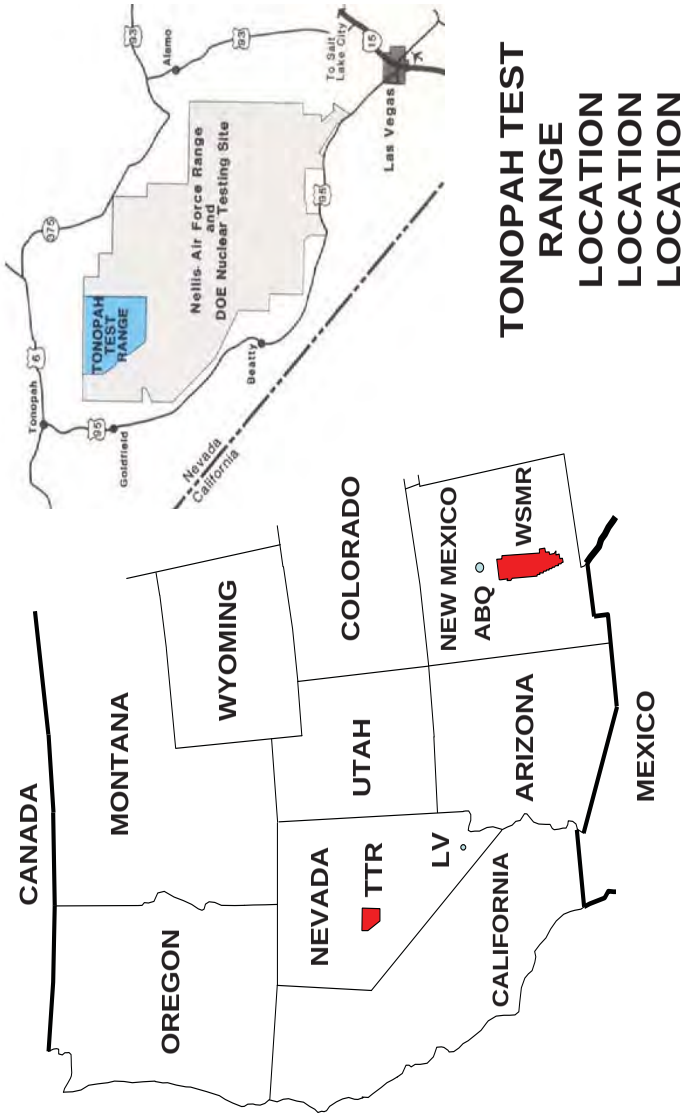
Sincerely

Clair Blackburn

5/15/2008

Blackburn, Clair
Page 2 of 2

PC_1310



Blanchard, Rosemary
Page 1 of 2

PC_1192

Levens, Matthew

From: R BLANCHARD [rosemary_blarchard@msn.com]
Sent: Friday, April 11, 2008 3:07 AM
To: Complex2030
Subject: Draft Complex Transformation SPEIS Comments

Importance: High

Attachments: Written comments on Draft Complex Transformation SPEIS.doc

Written
nts on Draft C

Please accept the attached comment on your Draft Complex Transformation SPEIS. The written comment supplements and reinforces the oral testimony I presented at your hearing in Washington, D.C. on Tuesday, March 25th.

Thank you,

Rosemary Ann Blanchard

Blanchard, Rosemary

Page 2 of 2

PC_1192

Rosemary Ann Blanchard
1727 Los Jardines Pl., NW
Albuquerque, NM 87104
rosemary_blanchard@msn.com

April 18, 2008

Mr. Theodore A. Wyka,
Complex Transformation SPEIS
Document Manager,
Office of Transformation, NA–10.1,
Department of Energy/NNSA,
1000 Independence Avenue, SW., Washington, DC 20585

SUBJECT: Draft Complex Transformation SPEIS Comments

Dear Mr. Wyka and NNSA Policymakers,

This letter supplements and reinforces the testimony which I made at your hearing in Washington, D.C. on Tuesday, March 25 on the proposed Draft Complex Transformation SPEIS. As I am sure you are aware from the transcript of the March 25th hearing, I reside in Albuquerque, New Mexico. As a citizen and down-river neighbor I am opposed to the options you have proposed for the "transformation" of he United States' nuclear weapons complex. My opposition is based upon a number of bases, some regional, some geopolitical:

1|1F 1. The plan to streamline and reinstitutionalize th production of new plutonium pits is inconsistent with the goals of the Nuclear Non-Proliferation Treaty and will encourage other nations to "update," expand and initiate their own development of nuclear weapons.

2|14O 2. The areas identified for intensified production and testing of nuclear materials such as plutonium pit production in Los Alamos are geologically fragile and at risk for catastrophic environmental degradation if your plans are implemented. For example, Los Alamos sits on a highand eroded mesa above the Rio Grande River and its watershed. Areas of concentrated population and of unique cultural heritage are located beneath the mesa and downriver from Los Alamos. It is unconscionable to underake production of an inherently dangerous substance like plutonium in such a location.

3|9B 3. The resources you are investing in this project ake resources away from the more necessary effort to redirect the technological expertise gathered at the national laboratories to help develop sustainable energy resources and ecologically sustainable regional development. Likewise, the effort and resources invested in pursuing extreme nuclear dominance deflect national resources, effort and thought away from more effective and appropriate strategies for improving the genuine security o the American nation and people.

This is a very expensive drive down a dead end road. I hoe you will consider how you can draw down our nuclear arsenal and our misplaced reliance on unilateral nuclear siperiority and actually use the expertise gathered around our labs to make our world, nation and region safer and mre livable.

Sincerely,

Rosemary Ann Blanchard

Rosemary Ann Blanchard
Associate Professor of Education
California State University Sacramento
And New Mexico Resident

Blickenstaff, Jon

Page 1 of 1

PC_365

Levens, Matthew

From: Angie and Jon [blickenov@fuse.net]
Sent: Thursday, February 28, 2008 11:03 AM
To: Complex2030
Subject: Comments on the Draft SPEIS

Dear Mr. Wyka,

1|16A 2|7O 3|1F I attended the public hearing on the Draft SPEIS in Oak Ridge the other day, but had to leave before my name was called to give my comment, so I am submitting it at this time. I am opposed to the three options laid out in the Draft SPEIS and support the No Production Alternative presented by OREPA. I would much rather live in a world where the U. S. joins with the desires of most of the rest of the world that we dismantle our stockpile of nuclear weapons and begin to implement the directives of the Nuclear Non-Proliferation Treaty than to continue the Bush Doctrine of refurbishing our nuclear arsenal to support plans for wars of aggression around the world.

4|2E I would also like to comment on the strategy of locating these hearings in areas where there is a large population who make their living supporting the nuclear weapons industry. This decision-making process is part of the larger democratic process and should involve the entire population. By placing the hearings in communities with an overwhelming number of natural allies who have vested monetary or career interests in nuclear weapons production, you inevitably get a warped sense of what the public thinks. It was very clear at the part of the hearing I was able to attend that every person who spoke in favor of the Draft SPEIS had selfish interests in doing so, and that it was the people who spoke in opposition who had come because of convictions. I don't doubt that there are people who support your plans who don't have vested interest in the outcome, but I didn't hear any at the hearing.

I hope you will give the No Production Alternative the consideration it deserves. These decisions are too large for us, our children, and the rest of the world to not consider every viable alternative.

Sincerely,
Jon Blickenstaff

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Blissman, Beth

Page 1 of 1

PC_1926

Levens, Matthew

From: Beth Blissman [bethblissman@oberlin.net]
Sent: Saturday, April 12, 2008 9:55 PM
To: Complex2030
Subject: Comment: Complex Transformation

Mr. Theodore Wyka
Complex Transformation
SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy
1000 Independence Avenue, SW
Washington DC 20585

Dear Mr. Wyka:

1|16A; 2|10B I urge you to place a hold on the National Nuclear Safety Administration (NNSA) plan called "Complex Transformation." Our country does not need a 4-fold increase in the Los Alamos National Lab's capacity to produce plutonium pits, nor do we need nuclear weapons of any kind. What we need are clear plans to explore safe renewable energy, such as solar, wind and geothermal.

3|9H This proposal is premature, as even the House Armed Services Committee recently stated "there is an urgent need for a debate over the role of nuclear weapons in U.S. strategic posture." Please leave time for the incoming president to prepare a new Nuclear Posture Review, which could then be used as a basis for establishing future United States arms control objectives and negotiating positions. As it stands, the NNSA's Complex Transformation draft SPEIS would be an expensive misuse of taxpayer money if the next administration decided to change it, which will most likely be the case.

Thank you for your time and attention.
Best, Beth

Dr. Beth Blissman
Oberlin, OH

1

Blottman, Rosemary

Page 1 of 1

PC_282

P.O.Box 4005
Ronkonnkoma, NY 11779-0430
March 31, 2008

Theodore A. Wyka
Complex Transformation
SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Wyka:

1|16A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

I am also opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal.

2|1J Building this new plant would send a contradictory message to other countries, such as Iran, who may be seeking nuclear weapons. While the U.S. is asking others to forego developing nuclear arsenals, we are simultaneously trying to increase our own capacity to build new nuclear weapons.

Yours truly,

Sr. Rosemary Blottman

Sr. Rosemary Blottman

Blume, Brenda

Page 1 of 1

PC_350

March 24, 2008

Brenda Blume
2811 La Junta St.
Santa Fe, NM
87507

Dear Mr. Wyka,

I am writing because I am afraid that the expansion of plutonium pit manufacture at Los Alamos, New Mexico will ~~pollute~~ contaminate our land and water.

1|14M.2 I live in Santa Fe. Soon we will be taking our drinking water from the Rio Grande. The water will be drawn from the Rio Grande below where the run off from Los Alamos joins the Rio Grande. The water well closest to this area the Buckman well has been contaminated with plutonium. We need water, please do not risk accedents at Los Alamos that could pollute our water.

Pollution of our water with ~~radio~~ radioactive particles could pose a risk to the health of all New Mexicans down stream from Los Alamos. The cost of health care could cost more money to treat the people, esp. children, the most at risk group.

2|9B The Los Alamos lab could change its focus and not work with radioactive materials for example re-newable energy research.

3|14M.3 The Lab has a poor record for waste disposal and the mountainous road up to the lab will always be dangerous in the winter.

5|16A Please dontt move pit productions or contrive current pit production at Los Alamos Lab. Thanks for

Brenda Blume

Blume, Harriet

Page 1 of 1

PC_493

Buenaflor, Justin

From: Harriet Blume [hblume@netzero.net]
Sent: Thursday, March 13, 2008 8:11 PM
To: Complex2030
Subject: complex transformation

Dear Theodore Wika,

1|1J 2|16A I have been informed that the Department of Energy is considering building a new bomb plant. I'm writing to let you know that I think spending $150 billion on a plan to build a new plant capable of producing up to 125 new nuclear warheads per year is a terrible idea. We, as the most powerful nation in the world, must send a message to other nations capable of building nuclear warheads, by setting an example, ourselves, of how wrong we think that choice is. We cannot both prepare for nuclear war and pave the way to international peace. These two courses of action are incompatible and defeat each other's chances. Please consider the results of Hiroshima and Nagasaki bombings seriously as examples of a mistaken decision on our part , which resulted in the needless loss of thousands upon thousands of lives.

Sincerely,
Harriet Blume

1

Blumenkrantz, Jack

Page 1 of 1

PC_1721

Levens, Matthew

From: blumenkrantz@sbcglobal.net
Sent: Sunday, April 06, 2008 3:43 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|15A The Department of Energy is doing a good and important task in sensibly coordinating the nation's nuclear systems.
It can do an even more critical enhancemrnt of the decisions involved in regulating our nuclear weapons. Use the Complex Transformation program to stem the proliferation by accentuating that the USA is the most powerful nuclear power in the world. and will continue to be for decades, probably centuaries

Sincerely,
jack blumenkrantz
3529 clement st
san francisco, CA 94121

cc:
Senator Dianne Feinstein
Senator Barbara Boxer
Representative Nancy Pelosi

1

Boardman, William

Page 1 of 1

PC_1254

Levens, Matthew

From: William Boardman [panthers007@comcast.net]
Sent: Thursday, March 27, 2008 12:27 PM
To: Complex2030
Subject: Stop Nuclear Weapons Development

William Boardman
27029 Church Hill Road
Woodstock, VT 05091-9644

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A More nuclear weapons will do no one any good.

2|1F How about honoring the non-proliferation treaty?

And working toward a nuclear-weapons-free world?

Nuclear weapons are inherently immoral -- and war criminal -- since their use is impossible without killing non-combatants.

William Boardman
Woodstock Vermont

Sincerely,

William Boardman
8024571782

1

Boddum, Annie
Page 1 of 3

March 19, 2008

Annie Boddum
WILPF East Bay Branch
6961 Colton Ave,
Oakland, Cal 94611
510 339-1395

PC_1051

To: the Department of Energy

I am a member of Women International League for Peace and Freedom. I live in the area of the Livermore Lab.

There are 3 new big problems to living downwind of the Livermore lab.

#1. Is the new nuclear warhead replacement plan called "Complex Transformation" which is planned for Livermore Lab and other labs across the country. Problem 2 is the new germ warfare lab Problem 3 is the history of Livermore Lab's open air nuclear testing on site 300 in Tracy. All three adds up to risk of radioactive, or germ contamination of our water, soils, air food. and our bodies

Complex Transformation is a remake of the "complex 2030" defeated by congress in 2007. The D.O.E is disregarding the Congress's vote against replacing the nuclear warheads in the "complex 2030" plan.

Since the bombing of Hiroshima WILPF has always emphasized abolition of nuclear weapons. We believe the United States was committed to the global elimination of nuclear weapons. We were in compliance with its obligation under the Nuclear Non-Proliferation Treaty and the World Court ruling that the use of nuclear weapons as illegal.

1|1K That has changed since the 2002 Nuclear Posture Review. The current US Administration has abandoned the effort to abolish nuclear weapons and instead is resuming testing and developing of new types of nuclear weapons.

The problem with nuclear weapons is the radioactive uranium. Mining it is

2|14O polluting our ground water. Transporting and exposing employees to more uranium will

Livermore, CA

Boddum, Annie
Page 2 of 3

3|13A.1 not make us safer. Selling weapons other countries will not make our children safer. Using "depleted: uranium in wars does not help the falling reputation of the US. Nuclear accidents are waiting to happen.

This program and its disregard of public health and safety are a threat to human life. Livermore Lab has a history of unbelievable bad safety practices. There is no independent over site of this secret lab. The lab has been testing weapons in an open-air site 300 near Tracy until stopped by the local air quality board. Now again they want to expand to radioactive hydrogen in the H. bomb right here in Tracy.

4|10C
1. They have been fined $450,00 for improper transport of anthrax in open containers
2. There was the release of radioactive water into the sewer system that ended up in the local waste treatment plants sludge and into countless unsuspecting gardens.
3. The site is unsafe due to potential earthquake damage. In the 80s 44 people were injured and the building damage cost the lab millions.
4. There are 7 million people in the 50-mile radius at this site, let alone the populations at other sites in the plan.

5|5C.1 This expense is neither wise nor necessary. C. Bruse Tarter, former head of Lawrence Livermore, who headed an outside scientific team that reviewed the designs said there is no evidence showing the old weapons were deteriorating and need to be replaced. We have many thousands, of which none should ever be used.

6|2O Furthermore I am protesting the opening of the bio-lab at Livermore, a high security laboratory where more than 40 deadly microbes such as anthrax, Ebola, SARS, are being grown using genetic engineering with no independent oversight. Apparently this lab was granted funds because of expertise in use of aerosol. This is a dangerous goal in a secret nuclear defense site with a lousy tract record for safety and disregard for public or employee health. There are huge risks of accidental employee exposure and death and in

Boddum, Annie
Page 3 of 3

6|2O (cont)

the case of failure of containment public exposure. The planned use of HEPA air filters can be ineffective according to scientists. WILPF supports Bio-weapons transparent and independent inspection protocol and destruction of worldwide chemical and germ weapons stocks. There is a 1975 global ban on germ weapons.

I think all of us in room have in common that we want the world safe for ourselves and for all our grandchildren. The impact of your choice here could be life on this planet as we all depend and love.

Sincerely,

Annie Boddum
Pediatric Nurse Practitioner
Oakland grandmother of four
Member of Women International League for Peace and Freedom

Boland, Kevin
Page 1 of 1

PC_583

Levens, Matthew

From: Kevin Boland [ksb@lanl.gov]
Sent: Tuesday, March 11, 2008 10:25 AM
To: Complex2030
Subject: I support NNSA's complex transformation plans

1|15A

To Whom It May Concern,
I would like to express my support of the NNSA's Complex Transformation plan, specifically the upgrade of radiological and nuclear facilities at Los Alamos National Laboratory. The work we are currently involved in is vital to the current and future security of the nation, for reasons both military and geopolitical, such as energy security and nuclear waste. It is vital to not just maintain but to expand the scientific capability that can allow us to focus on the challenges of the future. In addition, many of the current facilities are in terrible shape, and new facilities are important for the safety of the workers.

Thank You,
Kevin S. Boland

****
Kevin S. Boland
Inorganic, Isotope, and Actinide Chemistry (C-IIAC) MS J514 Los Alamos National Laboratory Los Alamos, NM 87545
phone: 505-667-5394
pager: 4-2229 (outside: 664-2229)
****

1

Bolton, Billie
Page 1 of 2

Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement— U.S. Department of Energy National Nuclear Security Administration

PC_994

Written Comment Form
Must be received on or before April 10, 2008

From: Billie Bolton
P.O. Box 358
Dixon, NM 87527

1|16A I am opposed to any production of nuclear components at LANL because:

(1) LANL ~~cont~~ has & continues to contaminate our air, soil & water with radioactive materials, 2|14K.9 & has not cooperated with public to stop the contamination. Thousands of people ~~#~~ who worked at the Lab have died of cancer. We don't want expansion; we would like to see it closed! and lived near the lab & test sites.

(2) The Lab is located in the middle of a national forest where there is a constant danger of fire. It is just the kind of place that should not ~~be~~ ever ~~be used~~ be used to produce or 3|14O store anything that is hazardous to public health.

(3) New Mexicans, more than other urban areas, live closer to the land, & live off the land. People hunt & eat the meat of animals. People 4|14E.11 drink the water & use it ~~for~~ water their farms & gardens; ~~so~~ they eat the food that comes directly from the land. Everything LANL

Please use other side if more space is needed.

Comment forms may be mailed to:
Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Comment forms may be faxed to:
(703) 931-9222
or sent by electronic mail to:
complextransformation@nnsa.doe.gov

You may also submit comments through the project website which can be found at:
http://www.complextransformationspeis.com

Espanola, NM

Bolton, Billie
Page 2 of 2

3|14O (cont.) produces is what we are taking into our bodies — through the air, thru the water & through our food.

4) There is no reason to build more nuclear weapons when the US already has enough to blow up the world several times over. ~~DOE~~ DOE should be focussing ~~your~~ its time & money on finding more ways to produce clean renewable energy, make ~~non-polluting~~ efficient cars, & 5|9B ~~work for~~ things of that nature. The very subject of building nuclear weapons seems to be from ~~a bygone era~~ a bygone era. In this time of rapid global warming & few enemies, why are you wasting 6|9H our tax dollars on this dangerous & irrelevant proposal ~~which has already~~ ~~already~~ that puts our health ~~and safety at risk~~ in greater danger?

~~I am asking~~ I intend to ask all my government representatives to stop this project & force LANL to start to clean up the environmental catastrophe that they have already created.

Billie Bolton

Bonneau, Bonnie
Page 1 of 10

PC-981

April 25, 2008

Mr. Theodore Wyka
C-T SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Re: Public Comment to the draft Complex Transformation Supplemental Programmatic Environmental Impact Statement, DOE/EIS-0236-S4

Dear Mr. Wyka,

The Department of Energy (DOE) is proposing Complex Transformation, with a focus for expanding nuclear weapons manufacturing at Los Alamos National Laboratory (LANL).

1|14O I live in North Central New Mexico and have been and will be impacted by expanded nuclear weapons manufacturing at LANL through air emissions, discharges to water
2|2E and burial of waste in the land. I just learned of the transformation complex document and request a 90-day extension of time to provide informed public comments to DOE.

My primary concern at this point is that DOE states "there are no agricultural activities present at LANL, nor are there any prime farmlands in the vicinity." p. 4-2. For DOE, a "vicinity" or "region of influence" is generally an area within a 50-mile radius of its facility.

3|14A DOE defines "prime farmlands" as "land that has the best combination of physical and chemical characteristics for producing food, feed, fiber, forage, oil seed, and other agricultural crops with minimum inputs of fuel, fertilizer, pesticides, and labor, without intolerable soil erosion, as determined by the Secretary of Agriculture (Farmland Protection Act of 1981, 7 CRF 7, paragraph 658)." p. 13-27.

On its face, a DOE claim that there are no prime farmlands in the vicinity of LANL is wrong. Before the Atomic Energy Commission arrived on the Pajarito Plateau in 1943, all this land was prime farmland. LANL is located within the food basket of Northern New Mexico.

Bonneau, Bonnie
Page 2 of 10

Culture is half of agriculture.

[Add your story here.] Weather this is the kind of "prime farmland" one finds in the midwest,
4|14H or not, it is the farmland which we have and there are loads of orchards, gardens, fields and pastures within 50 miles of LANL. This area was quite isolated until WWII and subsistance farming was the normal way of life for the native Americans and settlers as well. Irrigation water systems, known as acequias are over 300 years old. Organic farming is a new aspect to this old tradition.

5|2B DOE must retract the draft Complex Transformation Supplemental Programmatic Environmental Impact Statement and reassess the LANL impacts to agriculture. Then DOE must submit the revised draft to the public for review and public comment.

Sincerely, bonnie bonneau

P.S. I teach gardening to children at Taos Elementary school, 15 years and still digging it!

Print name and address:

Ms. Bonnie Bonneau
P.O. Box 351
El Prado, NM 87529

cc: Senator Pete Domenici at (505) 988-6511, fax (505) 988-6514
Senator Jeff Bingaman at (505) 988-6647, fax (505) 992-8435
Representative Tom Udall at tom.udall@mail.house.gov
Representative Heather Wilson at (505) 346-6781, fax (505) 346-6723
Representative Steve Pearce at (505) 522-2219, fax (505) 522-3099
Governor Bill Richardson at (505) 476-2200
President Pro Tempore Tim Jennings at (575) 623-8331, fax (575) 623-9378
House Speaker Ben Lujan at ben.lujan@nmlegis.gov

Bonneau, Bonnie
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PC_981

"Every gun that is made, every warship launched, every rocket fired signifies, in the final sense, a theft from those who hunger and are not fed, those who are cold and are not clothed.

This world in arms is not spending money alone. It is spending the sweat of its laborers, the genius of its scientists, the hopes of its children ....This is not a way of life at all in any true sense. Under the cloud of threatening war, it is humanity hanging from a cross of iron."

The Honorable Dwight D. Eisenhower
1890-1969
34th President of the United States
Supreme Commander, Integrated European Defense Forces

Bonneau, Bonnie
Page 4 of 10

PC-981

Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

NNSA National Nuclear Security Administration

4-25-08

Written Comment Form

Must be received on or before April 10, 2008.

Greetings, I made oral comments in Espanola, New Mex on Mar. 27, 2008. This is to document my reference to the Rio Grande Rift. I site a book: Rio Grande Rift: Tectonics and Magmatism; Robert E Riecker, Editor, 1979. Am sure of yaw research the subject yaw can find newer documents but the American Geophysical Union of Washington DC published this and it is full of technical essays. I plan to include copies of several pages from this book in this comment and hope yaw will put more effort in investigating the geologic suitability of this area. Los Alamos was originally a hidden lab. located for secclusion - it is no longer a secret and if yaw must continue yaw violent destruction mission, please do it somewhere more suitable than New Mexico, bonnie bonneau

Please use other side if more space is needed.

Comment forms may be mailed to:
Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Ms. Bonnie Bonneau
P.O. Box 351
El Prado, NM 87529

You may also submit comments through the project website which can be found at:
http://www.complextransformationspeis.com

Bonneau, Bonnie
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Manley PC-981
-Last page of FORWARD PC-981

segment and their higher initial Sr^{87}/Sr^{86} ratios probably reflect differences in age and composition of the Precambrian lithosphere between the two areas.

Volcanism along the Rio Grande rift increased slowly after the middle Miocene lull (20-13 m.y.) with activity concentrated initially in the Socorro triangle and the Jemez Mountains where the rift transects major northeast-trending lineaments. The southern Rocky Mountains and adjacent areas were strongly uplifted between about 7 and 4 m.y. ago. Total uplift since middle Miocene has been about 1100 m (Axelrod and Bailey, 1976), much of which probably occurred during this brief interval. The uplift is probably due to mantle upwelling like that documented for the Great Basin and adjacent areas by Eaton et al. (in press). Block faulting accompanying epeirogenic uplift disrupted the early broad basins of the Rio Grande rift and formed the modern topography, with narrower, more sharply defined basins. Preliminary calculations based on deflection of lineaments indicate a total extension across the Rio Grande rift of 100-150%. These figures are an order of magnitude larger than previous estimates, but they are consistent with the quantities of basaltic magma that must be injected into the crust to maintain the heat flow anomaly (A. Zachenbruch, 1978, oral commun.) and to explain the residual positive gravity anomaly along the rift axis (Decker and Smithson, 1975; Cordell, 1978).

Increased runoff from newly elevated alpine regions integrated the drainage to form the ancestral Rio Grande prior to 4 m.y. ago. Widespread geomorphic surfaces, graded to the ancestral Rio Grande and its tributaries, became mantled with basalt flows following sharp acceleration of basaltic volcanism about 5 m.y. ago. Lowering of base levels following capture of the Rio Grande at El Paso during middle Pleistocene time (Kottlowski, 1958) resulted in dissection of basins along the Rio Grande drainage and isolation of basalt-capped mesas. Epeirogenic uplift has continued since 4 m.y. ago but at a reduced rate. Rifting continues today as evidenced by abundant fault scarps cutting Pleistocene deposits, high heat flow, modern elevation changes, modern magma bodies, and geophysical evidence for anomalous crust and upper mantle beneath the rift.

References

Axelrod, D.I., and H.P. Bailey, Tertiary vegetation, climate, and altitude of the Rio Grande depression, New Mexico-Colorado, Paleobiology, 2, 235-254, 1976.

Baldridge, W.S., Petrology and petrogenesis of Plio-Pleistocene basaltic rocks from the central Rio Grande rift, New Mexico, and their relation to rift structure, this volume, 1979.

Chamberlin, R.M., Structural development of the Lemitar Mountains, an intrarift tilted fault-block uplift, central New Mexico, Los Alamos Sci. Lab. Conference Proceedings, LA-7487-C, 22-24, 1978.

Chapin, C.E., R.M. Chamberlin, et al., Exploration framework of the Socorro geothermal area, New Mexico, N. Mex. Geol. Soc. Spec. Publ. 7, 114-129, 1978.

Chapin, C.E., and W.R. Seager, Evolution of the Rio Grande rift in the Socorro and Las Cruces areas, N. Mex. Geol. Soc. Guidebook of Las Cruces Country, 26th Field Conf., 297-322, 1975.

Cordell, L., Regional geophysical setting of the Rio Grande rift, Geol. Soc. Amer. Bull., 89, 1073-1090, 1978.

Decker, E.R., and S.B. Smithson, Heat flow and gravity interpretation in southern New Mexico and West Texas, J. Geophys. Res., 80, 2542-2552, 1975.

Bonneau, Bonnie
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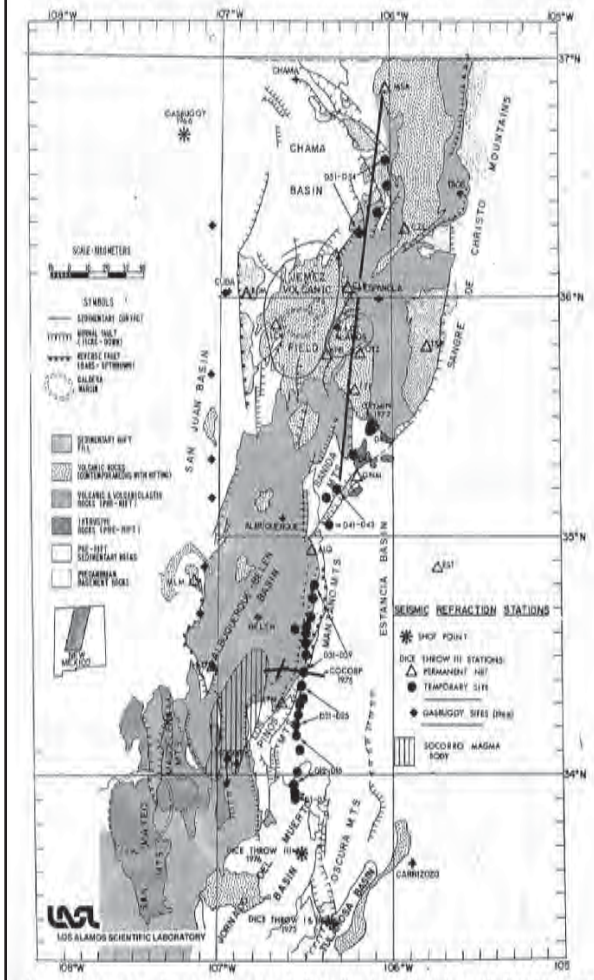
Fig. 2. General geologic map of the Española basin, New Mexico.

Bonneau, Bonnie
Page 7 of 10

Olsen, Keller & Stewart

SEISMIC REFRACTION 131

PC-981



1. Index map of north-central New Mexico showing shotpoints and rding stations for seismic refraction profiles in the vicinity of Rio Grande rift. The line extending from GNM to MSA indicates the e at which Pn was a first arrival for DICE THROW explosions. Also n are the locations of the 1975 COCORP deep reflection profile and Socorro Magma Body. Base map is simplified from Woodward,

Bonneau, Bonnie
Page 8 of 10

PC-981 -"SEISMICITY"

156 SANFORD, OLSEN AND JAKSHA

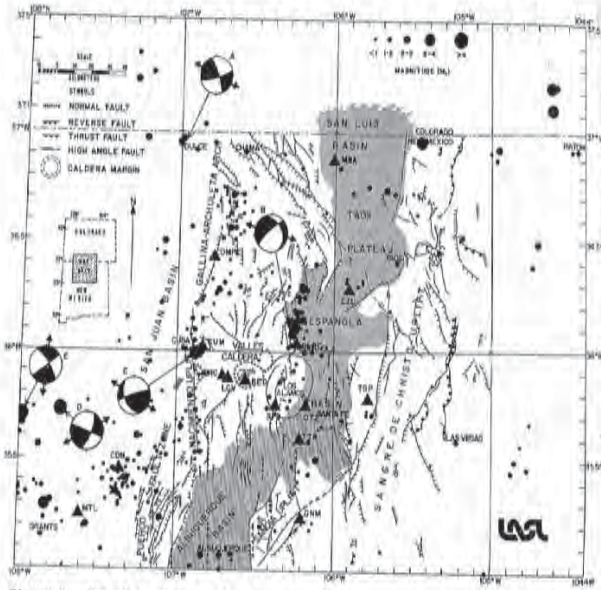


Figure 4. Map of north-central New Mexico showing epicenters and magnitudes of earthquakes located by local seismic networks between September 1973 and June 1978. Locations of seismic network stations are shown as filled triangles. Focal mechanisms for selected events and areas are included. The base map is simplified from the tectonic map of Woodward et al. (1975). The central valley of the Rio Grande rift is shaded.

the major young and old faults, and the boundaries of the mid-crustal magma body and the Socorro caldera. Also shown in a rectangular inset is a sample of the results of detailed mapping in the Socorro-Polvadera Mountains horst block (Chamberlain, 1978). The complexity of faulting in this area is believed typical of the entire region including the Socorro and La Jencia structural basins.

Nearly all of the microearthquake activity shown in Figure 2 lies well within the margins of the Rio Grande rift. The epicenters are distributed over a 2300 km^2 area which is centered roughly above the extensive mid-crustal magma body. With the exception of some epicenters in the Jornado del Muerto basin to the east of Socorro, this is the general pattern of seismic activity for the Socorro area obtained by the ASL (Fig. 5).

Within the active area are concentrations of activity, notably west and southwest of station WT and west of station BG. In part, these concentrations of epicenters are the result of having stations favor-

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Bonneau, Bonnie
Page 9 of 10

PC-981 Groundwaters Chemistry

284 SWANBERG

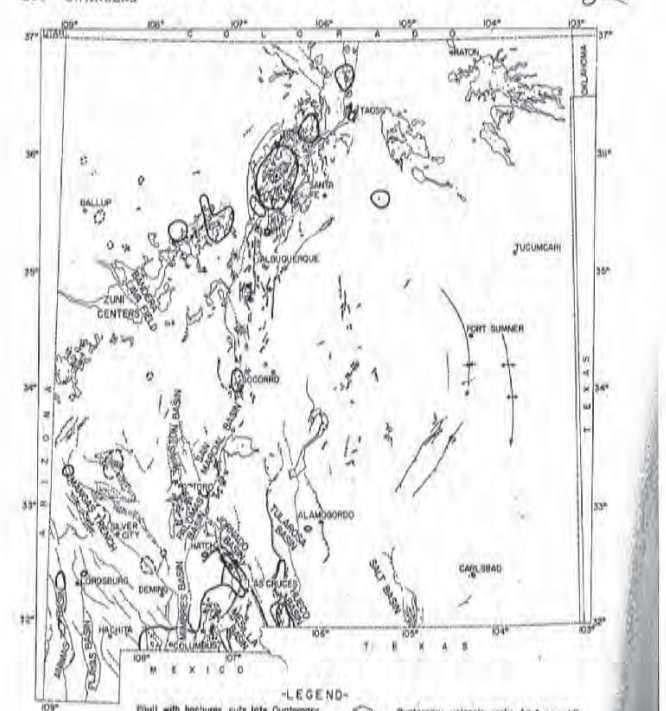

Fig. 4. Locations of major geothermal areas with respect to Quaternary tectonic activity and vulcanism. Geology from W. Seager and J. Callender (personal communication).

Bonneau, Bonnie
Page 10 of 10

Swanberg PC-981

GROUNDWATERS CHEMISTRY 285

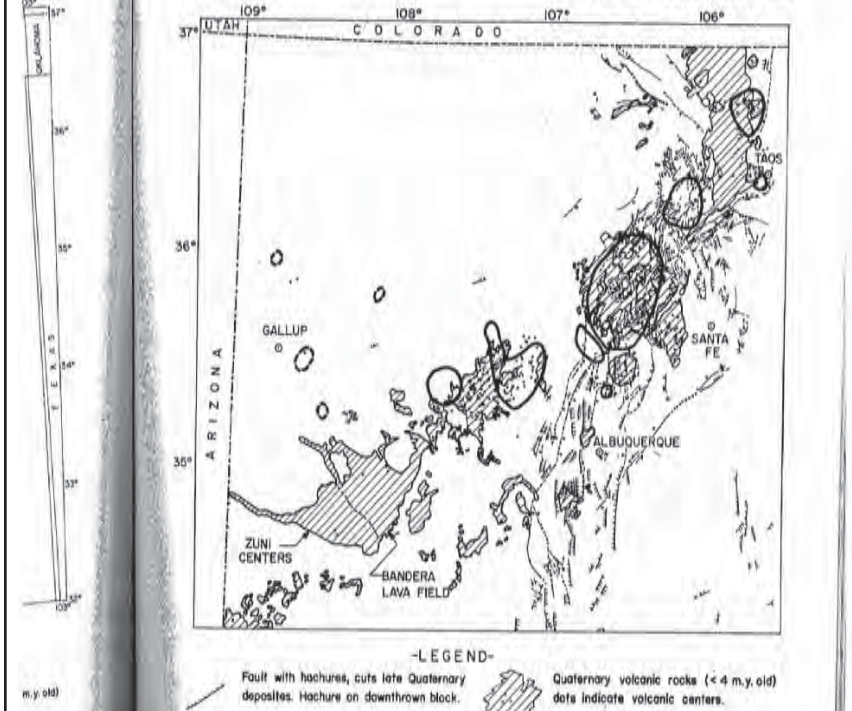

Fig. 4a. Detailed portion of the northwest part of Fig. 4.

Booth, Bradley

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PC_1931

Levens, Matthew

From: Bradley Scott Booth [bbooth@unm.edu]
Sent: Wednesday, April 30, 2008 1:09 PM
To: Complex2030
Cc: The Secretary
Subject: LANL complex transformation and weapons work

1|14K; 2|14O In order to "transform" our country's atomic weapons production, we will have to face serious renewed risks of accident, environmental pollution, and threats of terrorism.

3|10B The risks which have been identified with weapons production at Los Alamos and other sites are too great and potentially too costly to be acceptable.

4|16A We just don't need any more atomic bombs that bad.

Sincerely,
Bradley Scott Booth
226 Kit Carson Road - Apt. Apple 7
Taos, NM 87571

1

Born, Jan

Page 1 of 1

PC_1626

Levens, Matthew

From: jborn@maine.rr.com
Sent: Saturday, April 05, 2008 2:29 PM
To: Complex2030
Subject: Complex Transformation SPEISComments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

Make jobs, not bombs. Enough is enough.

1|16A I ask that you include my comment as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project.
Thank you.

Sincerely,
Jan Born
1030 Bridgton Rd
Westbrook, ME 04092

cc:
Senator Olympia Snowe
Representative Tom Allen
Senator Susan Collins

Bowen, Angus
Page 1 of 1

PC_806

Levens, Matthew

From: Angus Bowen [angoose@cableone.net]
Sent: Thursday, March 27, 2008 7:08 PM
To: Complex2030
Subject: Plutonium Pits

Angus Bowen
617 Eastlake Ct. SE
Rio Rancho, NM 87124-2174

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|10B I understand the administration wants to build a plant to produce plutonium pits for nuclear weapons here in the Land of Enchantment. The administration must assume that we have nothing to lose since Nuclear weapons and devices are ubiquitous, already, in New Mexico.

Please take the high moral ground and have the decency to oppose this proposal and don't give me the "it will be good for the Economy, good for Defense and good for fighting Terrorism" and good for Homeland Security" argument. It's time to stop this nonsense.

Sincerely,

Angus Bowen

Bowers, Victoria
Page 1 of 1

PC_145

Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement—U.S. Department of Energy National Nuclear Security Administration

Written Comment Form

Must be received on or before April 10, 2008.

1|15A I Support the NFSA Complex

Victoria Bowers

Please use other side if more space is needed.

Comment forms may be mailed to:
Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Comment forms may be faxed to:
(703) 931-9222
or sent by electronic mail to:
complextransformation@nnsa.doe.gov

You may also submit comments through the project website which can be found at:
http://www.complextransformationspeis.com

Boyd, Candace

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PC_141

Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

NNSA
National Nuclear Security Administration

Written Comment Form

Must be received on or before April 10, 2008.

1|16A I oppose the proposed Complex Transformation as it is now written and support including a No Productive Alternative in the Environmental Impact Statement. I consider nuclear proliferation the greatest threat to our national security. I agree with Secretary Kissinger, Secretary Schultz, and Senator Nunn. The United States should be taking a leadership role on nonproliferation and this proposal flies in the face of that.

2|7O

3|1J

Candace Boyd
4120 Fulton Dr.
Knoxville TN 37918

Please use other side if more space is needed.

Comment forms may be mailed to:
Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Comment forms may be faxed to:
(703) 931-9222
or sent by electronic mail to:
complextransformation@nnsa.doe.gov

You may also submit comments through the project website which can be found at:
http://www.complextransformationspeis.com

Boyd, Ron

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PC_101

CITY OF AMARILLO TEXAS

February 22, 2008

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Re: Complex Transformation Supplemental Programmatic Environmental Impact Statement (Complex Transformation SPEIS DOE/EIS 0236-S4)

Dear Mr. Wyka:

Thank you for the opportunity to comment on this matter. The Department of Energy's Complex Transformation Supplemental Programmatic Environmental Impact Statement (SPEIS) is of great importance to the Amarillo community.

1|15A As the City Commissioners of the City of Amarillo, we are proud of the Pantex Plant and its workers. Pantex has been a good neighbor, and we are fortunate to have it in the area. Accordingly, we strongly support Pantex continuing to maintain its current functions, advocate Pantex receiving the new functions and facilities listed in the preferred alternatives for the SPEIS, award Pantex any other new functions discussed in the SPEIS (such as the Consolidated Plutonium Center, Consolidated Uranium Center, Consolidated Nuclear Production Center, and/or the Consolidated Nuclear Center), and would urge DOE to reject any option that would result in the reduction or cessation of functions at Pantex.

2|5D.1 More specifically, we support Pantex remaining the Assembly/Disassembly/High Explosives (HE) production (formulation, processing and testing) and manufacturing (machining) center with all HE production and machining to support nuclear explosive package development and HE experiments up to 22 kg, and consolidating non-destructive surveillance operations at Pantex. We also support Pantex being established as the "Center of Excellence for Assembly/Disassembly" for nuclear weapons, and Pantex being established as the "Center of Excellence for High Explosives Production and Machining." We advocate Pantex receivingnon-destructive weapon/pit surveillance with the existing Weapons Engineering and Tesing Lab and the new Weapons Surveillance Facility, receiving updated HE machining and production facilities, and consolidating weapon and pit storage with a new underground storage facility located in Zone 12 of the plant.

P.O. BOX 1971 AMARILLO, TEXAS 3105-1971 TELEPHONE 806/378-3010

Boyd, Ron
Page 2 of 2

3|5C

Also, we believe that the addition of a Consolidated Plutonium Center, Consolidated Uranium Center, Consolidated Nuclear Production Center, and/or the Consolidated Nuclear Center (under the "Distributed Centers of Excellence" or "Consolidated Centers for Excellence" options) would be consistent with the historic disassembly and storage mission of the plant. Pantex currently stores more than 12,000 surplus pits and has a long history of handling pits in an excellent safety culture. The operation of most of these facilities will be an entirely new mission for any site ultimately selected. These facilities will require new construction, recruitment and training of additional personnel, and the creation of provisions for supporting infrastructure. DOE must essentially seek to establish a production capability that has never existed at any of the sites under consideration for these new facilities. It is our belief that Pantex's well-trained and unionized workforce makes it the safest and most cost effective site to undertake the responsibility of this new mission. Further, designation of Pantex would greatly reduce transportation of special nuclear materials (SNM), and its attendant costs and risks.

We strongly believe that DOE should reject any option under the "Consolidated Centers for Excellence" option, which may result in the cessation or reduction of weapons activities at Pantex.

1|15A (cont.)

As elected representatives, we are in tune with the sentiment of this area. We can say without hesitation that the Pantex plant enjoys tremendous public and bipartisan political support for existing and new missions and can ably perform those missions at the lowest additional costs to the taxpayer. DOE must have this strong, broad-based political support to accomplish anything relating to new missions dealing with SNM. DOE has the necessary support from local elected officials to help DOE's initiatives succeed.

Thank you for giving us the opportunity to illustrate why I believe that DOE's Record of Decision for this SPEIS should maintain current functions at Pantex, award the new functions and facilities listed in the preferred alternatives for the SPEIS, designate Pantex as the preferred site for other new functions discussed in the SPEIS (such as the Consolidated Plutonium Center, Consolidated Uranium Center, Consolidated Nuclear Production Center, and/or the Consolidated Nuclear Center), and omit Pantex from any site list from which such functions would be consolidated, relocated, or eliminated.

Yours truly,

Ronald Boyd

Ron Boyd, City Commissioner
City of Amarillo, Texas

Boyle, Todd
Page 1 of 1

PC_1557

Levens, Matthew

From: Todd Boyle [tboyle@rosehill.net]
Sent: Tuesday, April 08, 2008 9:25 PM
To: Complex2030
Subject: Citizen Comment regarding SPEIS, Complex Transformation

Mr. Wyka:
I OPPOSE the U.S. nuclear complex. Eliminate nuclear weapons.

1|16A As we sit in comfort, employees of the federal government sit inside submarines, aircraft and bunkers in front of control panels for launching thousands of nuclear weapons. Firing those weapons would be a monstrous crime, killing hundreds of millions of totally innocent people, burning, blasting them to death in agony.

2|2O Essentially, in Bangor we have the Holocaust, times a factor of 100, stored in the nose cones of the missiles. 6 million was bad. 600 million is quite possible in a nuclear war, since the worse it got, the more desperately all sides would be launching their remaining nukes.

3|1K Of course those with their hands on the controls believe that they would not be guilty or responsible for any evil. They have been selected for this psychological mindset, examined, and tested at regular intervals to absolutely guarantee obedience.

And likewise the whole chain of command above them. This narrow chain of command, this brotherhood of death, formally is controlled by the white house, but includes a top level committee in case the President goes nuts or is absent, for some reason. All of these people are *very* problematic, and have no place on the public payroll. They need to be removed, just as the nukes need to be dismantled.

The supporting crews of military and civilians surrounding the production, maintenance, and launching of nuclear weapons, likewise believe what they are doing is fine and necessary.

It has been my observation since the early 1970s in US Navy Submarine School in Groton CT, that everybody connected with the nuclear weapons systems and programs is maintaining some sort of rationalization for what they are doing. I cannot imagine what they have been telling themselves since the collapse of the Soviet Union, which ended any use for such a large nuclear arsenal in the U.S.

But there are hundreds of thousands of people employed in production and maintenance that is perfectly, directly connected with the preparation for Holocaust-X100. The manufacture and handling of the equipment and missiles is intrinsically connected with the Hx100. So is the mining and preparation of the uranium, plutonium, deuterium, or whatever they're using.

It seems, this large population of sociopaths, believes that they are morally absolved by the fact that they are only assembling things, turning screwdrivers, etc. By decomposing this holocaust into many small steps, and spreading these over long periods of time, those who are truly frighteningly evil such as Bush and Cheney and McCain, have managed to find enough low-grade sociopaths to cooperate in their preparation for monstrous crimes.

Todd Boyle
9745 128th Avenue NE
Kirkland, WA 98033

1

Brace, Michael

Page 1 of 1

PC_991

Dear Mr. Wyka,

The Citizens of New Mexico need time to bring the important question of the proposed Complex Transformation to our Legislators. The "No Action Alternative" is the only respectful alternative option to follow at this time. It is important for our political leaders to be involved, and to be in favour of such an important undertaking. Congressional races are up for elections and the outcome will instate a new political landscape in New Mexico. A new President will write a new Nuclear Posture Review. It is very unwise for NNSA to begin to embark upon a project of such magnitude at such an unstable time in our politics, environment and economy.

1|4A

2|1C

The only "Action Alternative" that will benefit the well being and safety of the citizens of New Mexico, and the one that the future generations whole heart-idly support is the is "Fence to Fence Clean Up". This is the "Action Alternative" requested by the New Mexico Environment Department. Please respect the rights of "Life, Liberty, and Pursuit of Happiness" of our future generations.

3|7J

Sincerely,

Michael M. Brace April 28, 2008

Page 2 of 2

Brackley, Simon

Page 1 of 1

PC_214

SANTA FE CHAMBER
OF COMMERCE

Wednesday, March 05, 2008

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy-NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr Wyka,

1|15A

I am writing on behalf of the 1400 member businesses of the Santa Fe Chamber of Commerce to express support for the Los Alamos National Laboratory (LANL).

- The Laboratory is a major influence on the economy of the entire Northern New Mexico region. Thousands of Lab employees live in Santa Fe and have a directly positive effect on our economy. Its workforce commands salaries and benefits totaling $1.15 billion each year.
- The spin-off effect of technology transfer has created many local companies and organizations that have thrived and themselves created revenue and jobs for local people.

2|14I;

1|15A (cont.)

- This influence is particularly important for Northern New Mexico as the Lab works to encourage minority and women-owned businesses to compete for Lab contracts.
- LANL and its staff are very involved in the local community and contribute millions of dollars to local causes and programs that help throughout the region. In 2007 alone, LANL's charitable contributions totaled $2.6 million.
- LANL and its partner organizations offer many well-paying career opportunities for local people who may otherwise leave the area.
- Educational opportunities emerging from the Lab benefit the entire region.

Please consider these important factors when making any decision concerning the future of the Laboratory and the Northern New Mexico region.

Thank you for your consideration,

Sincerely

Simon Brackley
President and CEO
(505) 988-3279

Bradley, Wiley

Page 1 of 1

PC_1618

Levens, Matthew

From: imasongfromthesixtees@hotmail.com
Sent: Saturday, April 05, 2008 2:58 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|2O What is the point of all of our nuclear weapons? Who is the U.S. planning on aiming these weapons at? And why is it that the United States, the only country who has ever used a nuclear weapon, is so afraid of nuclear weapons?

1|2O (cont) I think it's a very twisted world we live in where the most powerful country in the world, which already has thousands of nukes, feels it needs to make more. And ideally, wouldn't no country possess nuclear weapons?

Sincerely,
Wiley Bradley
130 La Salle
Mendota, IL 61342

cc:
Senator Dick Durbin
Senator Barack Obama

1

Bradshaw, Mike

Page 1 of 1

PC_796

Levens, Matthew

From: Wyka, Ted
Sent: Friday, February 22, 2008 8:29 AM
To: Complex2030
Subject: Fw: Continued Missons at Y-12

----- Original Message -----
From: Mike Bradshaw <bradshawmr@bellsouth.net>
To: Wyka, Ted
Sent: Thu Feb 21 08:51:39 2008
Subject: Continued Missons at Y-12

15A I support the modernization of Y-12 and the continued uranium work there. Nowhere else can you find the "can-do" attitude that exists in Oak Ridge!

Thanks for your support,

Mike Bradshaw

(39 years of service at the Oak Ridge sites)

Bradshaw, Mike
Page 1 of 2

PC_167

submitted by Mike Bradshaw

Public Hearing - New Hope Center
11:00Am - 1:00PM 2/26/08

- My name is Mike Bradshaw. I have been retired 5 years after having worked 39 years at the Oak Ridge plants, primarily Y-12.

1|5C
- I support Alternative 2 which essentially continues the Y-12 Uranium mission and the construction of a new Uranium Processing Facility @ Y-12. I understand that this is the NNSA Preferred Alternative.

- I would like to present a few brief reasons, most of them obvious, for my asking you to support the 2nd alternative.

2|5D.3
- Y-12 is already here and is well into the process of Cleanup and modernization. Why go anywhere else?

3|15A
- Y-12'ers have always had a "can-do" attitude about their mission. We have a long legacy of taking on the difficult jobs and completing them successfully. There is every reason to believe that this attitude will continue into the future.

Bradshaw, Mike
Page 2 of 2

- Y-12 is a vital participate in the local economy and job market. Loss of jobs and the resulting loss of dollars would have a devastating impact on our economy.

3|15A (cont.)
- Y-12 is in the process of completing a new storage facility for enriched uranium, for which Y-12 has the distinction of being America's "Fort Knox". I cannot imagine any viable reason for building another storage facility somewhere else and moving the material there. From a taxpayer standpoint, this would make no sense at all. In addition, I suspect that the cost of packaging/repackaging and transportation would be significant, again an unnecessary expenditure.

4|9B
- As a retiree and a member of the Coalition of Oak Ridge Retired Employees, or CORRE, I also have a vested interest in Y-12 maintaining a corporate entity here. It is important to me to have the ability to communicate face-to-face with my past employer on benefit plans questions and being involved in activities sponsored by Y-12 which are open to retirees. This may not be important to many of you now, but just wait until you retire. Things take on a very different perspective.

Braley, Grace
Page 1 of 1

PC_889

Levens, Matthew

From: Grace Braley [gracebraley@yahoo.com]
Sent: Monday, March 31, 2008 3:40 PM
To: Complex2030
Subject: nuclear weapons

Grace Braley
315 Ludlow St.
Portland, ME 04102-1809

March 31, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

Nuclear weapons will not resolve any crisis or benefit any nation.

1|1F After many years in which this world negotiated a non-proliferation policy, now the US wants to move aggressively back in the nuclear direction.

2|16A It must not happen. Everything that supports nuclear development or use is a terrible, terrible mistake that will harm all of us.

1|1F (cont) The US must not build new plants, new warheads, upgraded missiles, nothing. It needs to send a message into the world that we will return to the NPT.

Congress has been voting against these developments, and it is urgent to continue to oppose them.

Thank you

Sincerely,

Grace Braley

Bramlage, Nancy
Page 1 of 1

PC_2096

Levens, Matthew

From: S. Bramlage, Nancy [nancy.branlage@srcharitycinti.org]
Sent: Thursday, April 10, 2008 11:47 AM
To: Complex2030
Subject: Complex Transformation

The Leadership Council of The Sisters of Charity of Cincinnati would like to submit our comment on the proposed Complex Transformation. Our statement follows. Thank you for giving us the opportunity to make our statement.

COMPLEX TRANSFORMATION

In addition to giving our support to the statement of Religious Leaders in the United States and the comment statement of the Leadership Conference of Women Religious submitted by S. Marie Lucey, OSF, the Leadership Council of the Sisters of Charity of Cincinnati would like to add the following thoughts concerning the proposal from the DOE and NNSA on "Complex Transformation."

1|1J We believe that now more than ever we, as a nation, need to exert leadership in downsizing our nuclear stockpiles and calling a halt to nuclear proliferation. The US is good at sending out alarm signals when other countries begin to use new technology for nuclear energy or weaponry. Our building a new complex that would be able to quickly produce new nuclear warheads would only confirm the duplicity that other nations accuse the US of: WE CAN MAKE ALL THE PROGRESS WE WANT IN DEVELOPING NEW NUCLEAR WEAPONS, BUT OTHER COUNTRIES CANNOT. This will only offer incentive to other countries to do the same.

2|9B We would also like to emphasize the terrible waste of funds that this new production facility would cost the country, at a time when our finances are stretched thin and breaking. This would indeed amount to a moral outrage that would take much needed funds from the Federal coffers and use them to build a new nuclear arsenal when what we desperately need now is a powerful example to the world of our commitment to nonproliferation of nuclear weapons.

1|1J (cont.)

Brandt, Nancy

Page 1 of 1

PC_1482

Levens, Matthew

From: Nancy Brandt [nhbrandt@sbcglobal.net]
Sent: Tuesday, April 29, 2008 1:14 PM
To: Complex2030
Subject: I Oppose the Production of New Plutonium Pits

Dear Mr. Wyka,

1|1J I am deeply concerned that the so-called Complex Transformation plan will involve the production of new nuclear warheads. This is the wrong direction and removes our moral authority from our efforts to get Iran to stop pursuing nuclear weapons, if they are doing so..

We have not had a national cebard on our nuclear weapons policy.

2|16A Most people want a world free of nuclear weapons or one where they are strictly controlled. We cannot talk about non-proliferation with good conscience if we are doing this.

I am also sending a copy of this letter to the members of my Congressional delegation.

Nancy Brandt
222 E. Chestnut
Chicago, IL 60611

1

Bredesen, Phil

Page 1 of 1

PHIL BREDESEN
THE GOVERNOR OF TENNESSEE

22 February 2008

PC_1056

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, S.W.
Washington, D.C. 20585

Dear Mr. Wyka:

1|15A On behalf of the people of Tennessee, let me thank you for the efforts of the National Nuclear Security Administration to transform the Nuclear Weapons Complex into a cost effective and responsive array of facilities capable of meeting our country's needs into the next century. In a complex and uncertain world, I understand the need to maintain our nation's strength in the area of national security.

The Y-12 National Security Complex in Oak Ridge is a source of pride for the people of Tennessee and our nation, and I believe its role is essential to protecting America. I am aware that in your Preferred Alternative, the uranium and canned subassembly mission would remain at the Y-12 NSC. I am confident in saying NNSA's Preferred Alternative to transform the Nuclear Weapons Complex and to continue the uranium mission at the Y-12 NSC has my full support, as well as the people of Tennessee. I believe the continuation of Y-12's missions and the proposed transformation and modernization of the Y-12 NSC will allow NNSA to fully utilize the skills and productivity of proud Tennesseans committed to our nation's defense and will provide a safer, more secure, and truly efficient site in support of our national security.

Thank you for all you do to protect America's future.

Sincerely,

Phil Bredesen

cc: NNSA Administrator Thomas P. D'Agostino
NNSA YSO Manager Theodore Sherry

Oak Ridge, TN

Brennan, William

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PC_2143

Levens, Matthew

From: william brennan [wllm_brennan@yahoo.com]
Sent: Saturday, April 12, 2008 12:58 PM
To: Complex2030
Subject: NUCULAR NONEPROLIFERATION NONECOMPLIENCE, revised

Dear Editor,

1|20 Respect for God and nation was taught to us by our parents and teachers. Whats taught today is selfishness and how to make hell on earth?! America the ugly, littered and vandalized is the new American anthem. By thinking enough to sticking that candy paper in your pocket, could save us and future generations from a nuclear war. How?!

2|1K Its blind thoughtlessness, that allows this and the genocidal war monger in the White House who thinks he can do and say anything to get his way. Soon he and his puppets in the Supreme court and Congress will building a nuclear weapons factories in Oak Ridge Tennessee, and

3|1F the first new nuclear fuel production plant on the Delaware river, in violation of the Nuclear Nonproliferation Act of 1970.

1|20 (cont) We can't be silent and blind anymore to this nonsense or it could lead to forced lobotomies and nuclear war. So please allow me to vent. The streets in this country lead me to believe, from their unaesthetic, dangerous filthiness that anything goes in our land. We've made our own hell and now a genocide in Irak. None-motorized and pedestrians are no more noticed than is litter the size of elephants on our streets. We've allowed our living-spaces, foods, beverages, water, rivers oceans, air, airwaves, earth and even toothpaste to be poisoned. I'm going to count to three and you will wake up to this. One, two, three! Now your awake. You were hypnotized by TV, radio and endless presidential nominations.

WILLIAM M.BRENNAN
1106 BERWICK ST.
EASTON, PA.18042
TEL. 610 253-0100

_____
Do You Yahoo!?
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Brewer, Krista

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PC_122

WOMEN'S ACTION FOR NEW DIRECTIONS
250 Georgia Ave. SE, Suite 202, Atlanta, GA 30312
Phone: 404-624-5999
Fax: 404-624-7593
wandaatlanta@wand.org
www.atlantawand.org
www.wand.org

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Bobbie Paul, Field Director

Complex Transformation DEIS Hearing - February 21, 2008

1|16A Atlanta WAND opposes *Complex Transformation*. It is a misguided plan being marketed by DOE as a modernization and revitalization of the US nuclear weapons complex but when one looks beyond this streamlining and rearrangement of DOE weapons facilities the real intent of *Complex Transformation* is revealed: the U.S. National Nuclear Security Administration (NNSA) wants to continue what DOE began 60 years ago: building bombs.

2|9A *Complex Transformation* would cost $150 billion to ultimately create a new generation of nuclear weapons. This plan that we call "Bombplex" would strip our nation of self-respect and give our children, the *real* new generation, more reason to despair.

It is time for the weapons makers (and the politicians they handsomely influence) to realize that this is NOT what the people want. Over 33,000 people have already spoken out and protested "Bombplex" when it was first introduced as *Complex 2030* two years ago. Atlanta WAND members came to North Augusta on November 9, 2006 to do just that. We drove from miles around, incredulous that our country would even contemplate building new nuclear weapons while grappling with a sixty-year legacy of bomb making contamination dangerously in need of clean up, especially here at Savannah River Site. It took our breath away to think of the 35,000,000 gallons of high-level radioactive waste sitting in 49 aging tanks, leaking radionuclides into the groundwater and threatening the health of all those who live around the site and the downstream communities that depend on a healthy Savannah River. More bombs? More waste? We simply couldn't believe the DOE was serious.

3|14M 4|7J

5|1F We said "No" then and we say "No" now. We refuse to sit by quietly and allow our country to break the Nuclear Non-Proliferation Treaty we signed in 1970 (with other nuclear nations) promising to disarm as early as possible. We long to regain our credibility in the world, not continue to lose it, by arrogantly doing something we tell other nations not to even *think* of doing. How would we, how do we, explain this behavior to our children?

3|14M (cont.) 4|7J (cont.) Savannah River Site is slated to receive $1.390 billion in "EM" or environmental management funds in FY 2009 to continue the clean up that is badly needed at SRS. If we place more emphasis on *clean up* at SRS instead of *build up* at SRS, we can avoid endangering the budget for this critical environmental management necessity.

Atlanta WAND believes there is honor to be shared in cleaning something up that we, or those who have gone before us, have seriously messed up. This is the route

Brewer, Krista
Page 2 of 2

that we need to take, not one that preys on fears of imminent dangers or threats that can only be dealt with by creating more "usable" atomic bombs.

6|1K Fear mongering tactics have been the hallmark of the Bush administration for the past seven years: convince the people that they are under attack and you can get all the funding you want as long as you promise you will protect them. Does the thought of a nuclear bomb exploding make you feel protected, or totally helpless? More empowered or more enslaved?

7|1C Since George W. Bush's Nuclear Posture Review of 2001, the U.S. nuclear weapons budget has increased by 13%and the disdain that people may have been feeling towards supporting nuclear weapons has been manipulated into a "posture' that believes that nuclear weapons are usable.

1|16A (cont.) We do not think that nuclear weapons are usable and we mourn that they were ever developed and dropped on civilians in Hiroshima and Nagasaki in 1945, ultimately causing the deaths of 130,000 and 70,000 people in those two Japanese cities, respectively.

8|14O We cannot imagine ever using them again. We hope that by bringing the Hiroshima Peace Culture Foundation A-bomb exhibit to North Augusta that citizens of all ages will be reminded of the horrors caused by a nuclear blast, and contemplate the personal horror they would feel if they allowed our country to continue funding and developing new nuclear weapons capable of even greater mass environmental and human destruction.

9|9B The fact that we are developing weapons that we are likely never to use is of no comfort. Spending billions on a massive plan such as *Complex Transformation* is immoral when there are so many human and environmental needs that are going unmet in our country.

Former Cabinet members George Schultz, William Perry, and Henry Kissinger as well as former chairman of the Senate Armed Services Committee, Sam Nunn have adopted the joint position that we need to champion "the goal of a world free of nuclear weapons' as a "bold initiative consistent with America's moral heritage."

A resounding NO to *Complex Transformation* would be a good start.

Brewton, Molly
Page 1 of 1

PC_1653

Levens, Matthew

From: molly105@clarityconnect.com
Sent: Saturday, April 05, 2008 11:15 AM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|3A 2|1C It is inappropriate for the DOE to be moving ahead with upgrading the nuclear weapons complex.--That decision should be made, after a due degree and scope of analysis, by the President and Congress.

3|11B The DOE should be required to justify and prove its rationale for undertaking such a move before it is allowed to proceed forward. Too often, moves like this are allowed, even amidst widespread misgivings and reasons against them. CONGRESS MUST STAND FIRM ON THIS.

Sincerely,
Molly Brewton
119 South Hill Terrace
Ithaca, NY 14850

cc:
Senator Charles Schumer
Representative Maurice Hinchey
Senator Hillary Clinton

1

Brissen, Hans
Page 1 of 1

PC_892

Levens, Matthew

From: Hans von Briesen [hsvonbrieser@cybermesa.com]
Sent: Friday, April 11, 2008 2:20 PM
To: ComplexZ030
Subject: Complex Transformation plan

To the National Nuclear Security Administration, Department of Energy

First, thank you for postponing the deadline for commentary from April 10 to April 30.

1|16A It appears that the "Complex Transformation" of nuclear weapons production envisioned and promoted by the NNSA is unnecessary for national security, given the longevity of existing pits and their reusability. In the absence of a sane and intelligent, non- ideological review of the nation's nuclear strategy, the Transformation makes no sense, calling as it does for enhanced pit production capability.

2|1F Further, the Transformation is bound to endanger national security by undermining non-proliferation efforts, efforts in which LANL, NNSA, and DOE could be major contributors.

3|14O Its environmental cost -- including radioactive and chemical waste, resource consumption, including water and energy, and by an expenditure that seems likely to hinder the cleanup
4|7J of existing waste at Los Alamos -- is not justifiable.

I cannot help but believe that the Transformation is motivated by concerns other than those publicly acknowledged.

5|1K I urge that this plan be shelved, pending a thorough review and replacement of the current Nuclear Posture Review, a product of an Administration that has not only failed, but significantly subverted the nation, including areas of direct national security.

Sincerely yours,

Hans von Briesen
208 Sereno Drive
Santa Fe NM 87501-1536
hsvonbriesen@cybermesa.com

Bromm, Susan
Page 1 of 2

04/03/08 13:27 FAX 002

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

APR 3 2008

OFFICE OF
ENFORCEMENT AND
COMPLIANCE ASSURANCE

Theodore A. Wyka
Complex Transformation
SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Wyka:

In accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act, the Environmental Protection Agency (EPA) has reviewed the National Nuclear Security Administration's (NNSA) Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement (EIS) (CEQ # 20080004).

National security policies require NNSA to maintain the U.S. nuclear weapons stockpile and core competencies in nuclear weapons. This has been accomplished through a configuration of various facilities where nuclear weapons were designed, tested, and manufactured that is referred to as the nuclear weapons complex (the Complex). The Complex was designed and built during the Cold War and consists of several major facilities across the country that work together to keep the nation's nuclear stockpile safe and reliable without underground testing. Many of these facilities are old, too large, and very expensive to maintain. NNSA has taken several steps to consolidate the Complex into its current configuration. Since the completion of the 1996 Programmatic Environmental Impact Statement (PEIS) for Stockpile Stewardship and Management and its associated Record of Decision, NNSA has implemented the national security policies through the Stockpile Stewardship Program. NNSA proposes to continue the transformation by further consolidating operations which could result in the relocation of activities among sites. As a result, it is supplementing the 1996 PEIS to evaluate alternatives for establishing a smaller, more efficient and responsive nuclear weapons complex.

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Bromm, Susan
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04/03/08 13:27 FAX 003

The draft EIS evaluated alternatives that would restructure special nuclear materials manufacturing and research and development facilities; consolidate special nuclear materials throughout the Complex; consolidate, relocate, or eliminate duplicative facilities and programs and improve operating efficiencies; and identify one or more sites for conducting NNSA flight test operations. Specifically, it analyzed potential impacts associated with water resources, air quality and noise, geology and soils, biological resources, cultural and archaeological resources, environmental justice, socioeconomics, human health and safety, and land use. It also identified mitigation measures to be implemented to minimize or offset potential adverse impacts through regulatory consultations/permitting requirements and compliance agreements with various regulatory agencies.

1|2.I.2 Based on our review of the document and the above information, EPA does not object to the proposed action and have rated the draft EIS Lack of Objections (LO).

We appreciate the opportunity to review the draft EIS. The staff contact for the review is Marthea Rountree and she can be reached at (202) 564-7141.

Sincerely,

Susan E Bromm

Susan E. Bromm
Acting Director
Office of Federal Activities

Brooks, Susan
Page 1 of 1

PC_752

Levens, Matthew

From: Susan Brooks [suebee95133@yahoo.com]
Sent: Wednesday, February 27, 2008 2:25 PM
To: Complex2030
Subject: Nuclear Weapons

Susan Brooks
6209 Newkirk Ct.
Las Vegas, NV 89130-1417

February 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|1J I am opposed to development of new nuclear weapons. We should be working toward disarmament.

Building this new plant would send a contradictory message to other countries, such as Iran, who may be seeking nuclear weapons. While the U.S. is asking others to forego developing nuclear arsenals, we are simultaneously trying to increase our own capacity to build new nuclear weapons.

We should be modeling the high road and not being hypocrites.

Sincerely,

Susan Brooks
702-655-6015

1

Bross, Madeline

Page 1 of 1

PC_201

Madeline Bross
28243 Aline Dr.
Warren, MI 48093

March 1, 2008

Mr. Theodore Wyka
Complex Transformation SPEIS
Document Manager
U.S. Department of Energy
1000 Independence Ave. SW
Washington, DC 20585

The Complex Transformation Plan should be disapproved. The United States already has many nuclear weapons to destroy life. We must as a nation work for world peace. We need money for education, health care & promoting quality life here in the U.S. & on earth.

1|16A
2|3A

3|1J

4|9B

Sincerely,

Madeline Bross

Brown, Bruce

Page 1 of 1

PC_1935

Levens, Matthew

From: bruce brown [jeffreysbrown2@gnail.com]
Sent: Saturday, April 26, 2008 1:33 PM
To: Complex2030
Subject: plutonium pit production

1|16A;
2|3A;
3|9H

The citizens of Northern New Mexico do not want the Los Alamos National Laboratories planned expansion of plutonium pit production.
This expansion is not needed (we already have thousands of nuclear warheads and pits can be reused) and it is dangerous, immoral, polluting and a giant boondoggle of taxpayers' money. Please, stop
this insanity in its tracks, now!! - Dr. Bruce Brown (a New Mexico resident)

Brown, David
Page 1 of 1

PC_437

Buenaflor, Justin

From: David Brown [beachdood@aol.com]
Sent: Friday, January 18, 2008 8:31 PM
To: Complex2030
Subject: Citizen Comment regarding SPEIS, Complex Transformation

1|9H Mr. Wyka:
use our money make more solar panels and using them, not making more nukes (that we already have plenty of) and more enemies

David Brown
3380 Charring Cross Dr
Stow, OH 44224

1

Brown, Elizabeth
Page 1 of 1

PC_69

UNOFFICIAL BALLOT
NATIONAL REFERENDUM ON
THE FUTURE OF NUCLEAR WEAPONS

INSTRUCTIONS TO VOTERS: USE BLACK OR BLUE PEN ONLY. To vote on Measures A and B, fill in the oval after the word "Yes" or "No." You may add your own comments below.

Separate ballots are available for the National Nucear Security Administration of the Department of Energy, and United States Senator and Representatives. Voters are encouraged to cast all four ballots.

MEASURES SUBMITTED TO THE VOTERS
NATIONAL

1|9A **A** Shall the United States proceed with a$150 billion plan to modernize its nuclear weapons research, development and manufacturing complex in order to replace its existing nuclear weaponsand establish the capacity to build new types of nuclear weapons by the year 2030 ("Complex 2030")? YES ○ NO ●

2|1F **B** Shall the United States, in compliance with its obligation under the Nuclear Non-Proliferation Treaty, comnit to the global elimination of nuclear weapons no later than 2030 by initiatng negotiations leading to conclusion of a verifiable treaty, under strict and effective international control? YES ● NO ○

3|16A COMMENTS: I oppose the Dept. of Energy's "Complex transformation" plan. The U.S. should fully comply with the Non-Proliferation treaty and honor our disarmament obligations!

2|1F (cont.)

NAME Ms. Elizabeth Brown
ADDRESS 44 Beverly Rd. Berkeley, CA 94707

SIGNATURE Mrs. Elizabeth Brown DATE 2/11/08

Brown, Joan
Page 1 of 1

PC_71

PARTNERSHIP FOR EARTH SPIRITUALITY

PO Box 6531, Albuquerque, NM 87197
(505) 266-6966
info@earthspirituality.org

February 13, 2008

Mr. Ted Wyka NA-101
U.S. Dept. of Energy
1000 Independence Ave., SW
Washington, D.C. 20585
complextransformation@NNSA.DOE.gov

Dear Mr. Wyka:

My name is Joan Brown, a Franciscan Sister and President of the Partnership for Earth Spirituality. I write out of concern for the common good and Earth. I have concerns about the "Complex Transformation."

The plan, if implemented, will result in new capabilities and new infrastructure to make new nuclear weapons. Such a plan bespeaks an ongoing, aggressive nuclear posture. Under Article VI of the nuclear Non-Proliferation Treaty, the United States is obligated "to pursue negotiations in good faith on effective measures relating to cessation of the nuclear arms race at an early date and to nuclear disarmament, and on a Treaty on general and complete disarmament under strict and effective international control." "Complex Transformation." flies in the face of this treaty and the demands of ethics, not to mention morality. I do not want a smaller, safer, less expensive nuclear weapons complex, rather, I want none at all. We need to be using resources to address climate change which the Pentagon has said is the greatest national security threat. Implications of climate change are the destabilizing factors that affect the poorest in the world and will lead to future wars. 1|1F

The "Complex Transformation" plan locks in nuclear weapons as permanent U.S. tools of fear, oppression and empire. I believe and state that this is the wrong direction for our nuclear policy. Our goal should be to dismantle all nuclear weapons, assisting Russia and others to dismantle their own and allow for mutual inspection policies. 2|16A 3|1J

As a country founded to bring people freedom, we are to promote dialog, true democracy and respect for all people. We do not need any, let alone more or upgraded nuclear weapons. Even the so-called "tactical" nuclear weapons are still weapons of mass destruction and must not be developed. "Complex Transformation" will not promote a spirit of mutual respect and the brotherhood of nations. Rather, it promotes the self-centered and indeed short-sighted goals of one nation, in an era when the whole world is realizing how it is interconnected and in danger of catastrophe. Empires always bring forms of repression and always generate opposition.

I believe that we all want peace. We are at a juncture where we need to try new strategies for peace that are not engaged in nuclear military industrial complex. The brightest minds are called to work on new technology to replace fossil fuel, new technology to assist with accessibility to clean water, and new insights into human nature to address violence when it does occur in long lasting solutions that honor humanity and Earth. 4|7A

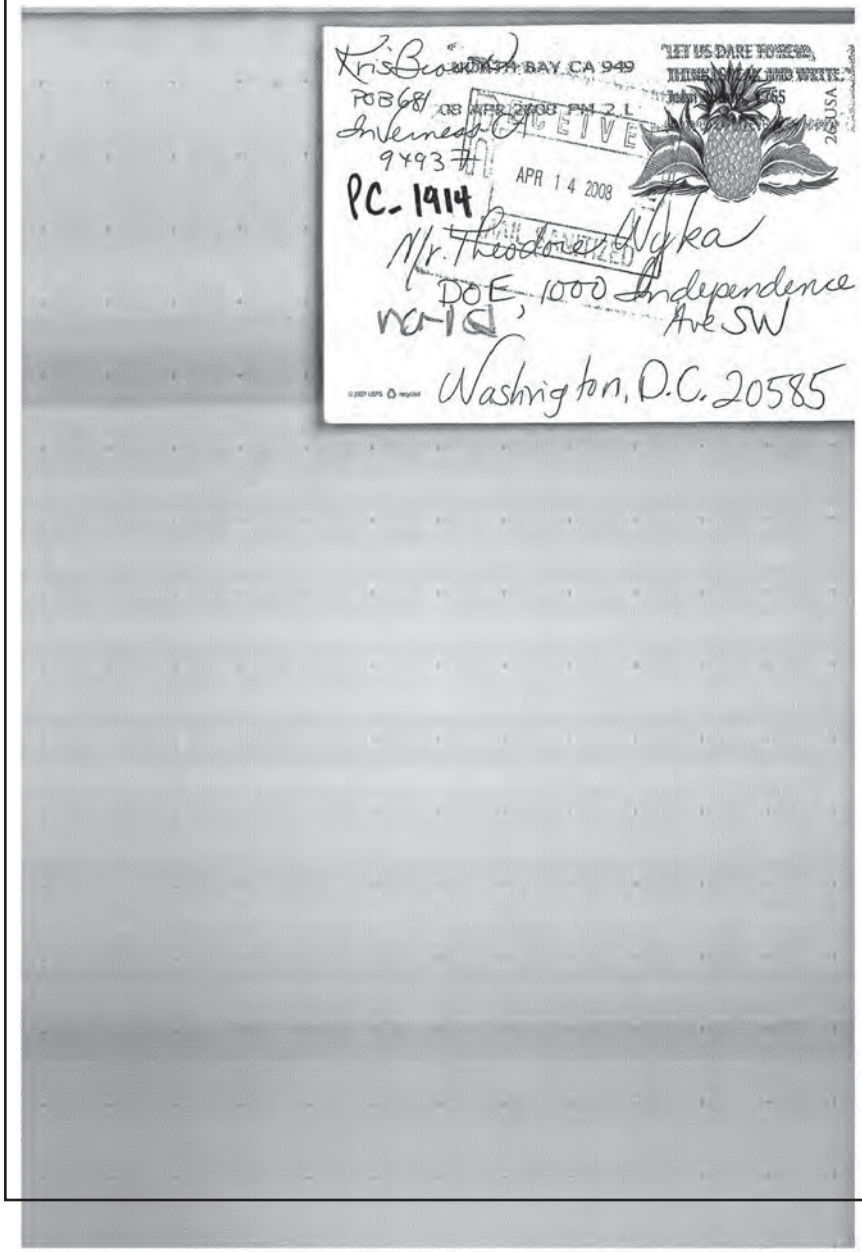
Peace and good,

Sr. Joan Brown, osf

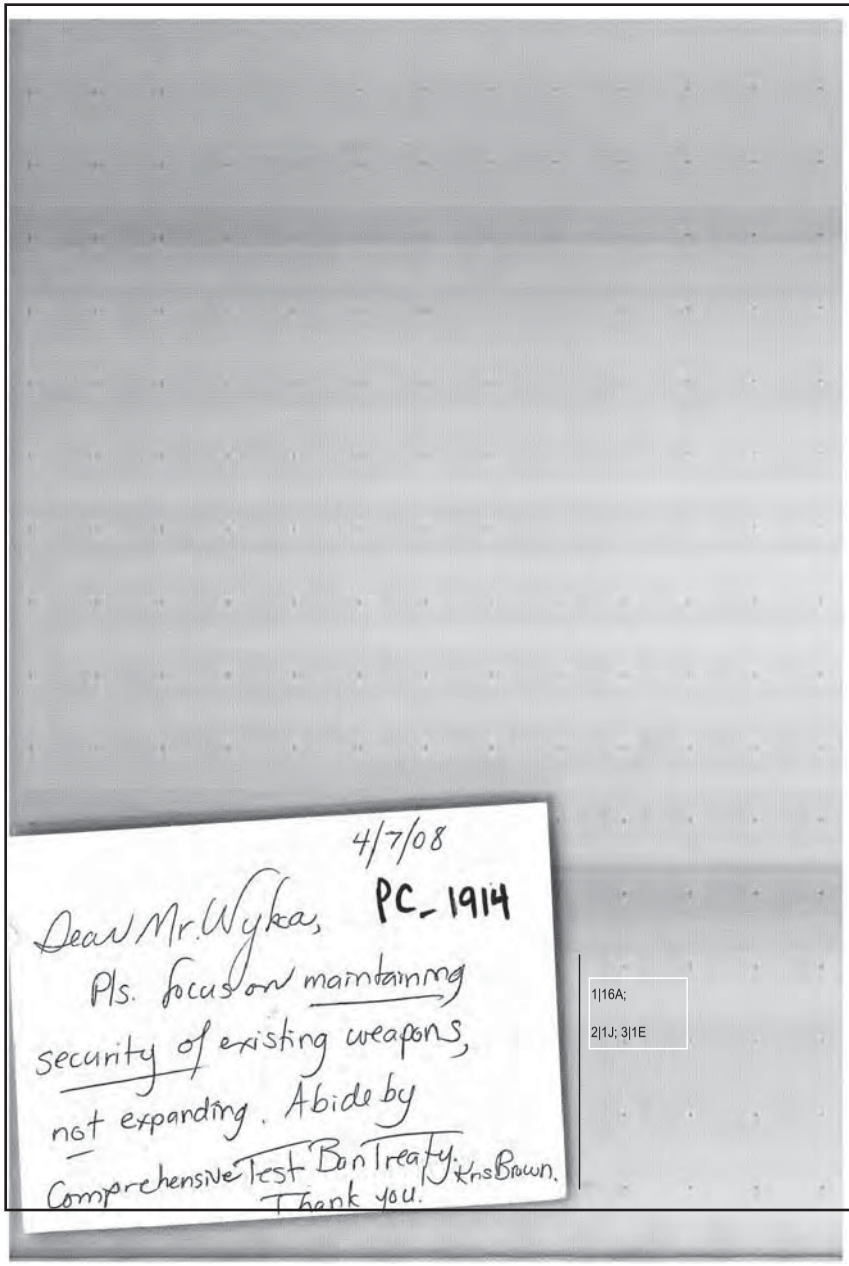
Sr. Joan Brown, osf
President, Partnership for Earth Spirituality

The small self of the individual reaches its completion in the Great Self of the universe.
—Thomas Berry, THE GREAT WORK

Brown, Kris
Page 1 of 2



Brown, Kris
Page 2 of 2



4/7/08

PC_1914

Dear Mr. Wyka,

Pls. focus on maintaining security of existing weapons, not expanding. Abide by Comprehensive Test Ban Treaty. Kris Brown.

Thank you.

1|16A;

2|1J; 3|1E

Brown, Rick
Page 1 of 3

PC_283

the people, and for the people". Let's start here.
March 23, 2008

Mr. Theodore A. Wyka
Complex Transformation
SPEIS Document Manager
Office of Transportation, NA-10.1
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

RE: Draft Complex Transformation SPEIS

Dear Mr. Wyka:

I am writing to submit my comments concerning the proposed "Complex Transformation" of nuclear bomb production and maintenance facilities in the United States, particularly with regard to the Y-12 Plant in Oak Ridge, Tennessee, which is about 45 miles away (and upwind) from where I live. It is stated in the summary of comments from the scoping period that the majority of comments expressed opposition to the nuclear weapons program, with one reason for such opposition being that the U.S. is violating the Nuclear Non-Proliferation Treaty by continuing this program. The response gave the impression that the public's wishes in this matter are not worth consideration. This attitude takes "the security policies of the U.S." as a "given, not to be debated. These "security policies" are said to require "the maintenance of a safe, secure, and reliable nuclear weapons stockpile, and the maintenance of core competencies to design, manufacture, and maintain nuclear weapons."

1|2C

Such policies should not be taken as a "given". The authority for such policy seems to be derived only from statements by President Bush, who is now near the end of his last possible term and has consistently over the last year or more received the support of 40% of the public or less in every poll that has been taken. The Nuclear Non-Proliferation Treaty is a higher authority since treaties entered into by the United States are the supreme law of the land according to the U. S. Constitution (which this president has often chosen to disregard, along with any international law that doesn't suit his purposes.) Some stockpile reduction, while preparing at the same time to be able to increase the size of the stockpile, cannot be unilaterally

2|1F

Brown, Rick
Page 2 of 3

declared to be compliance with the treaty. I doubt that many other countries would agree that this is good faith compliance.

Besides the legal reasons, there are better reasons, moral reasons not to do this. The description of a "safe and reliable" nuclear stockpile is a contradiction in terms. No "reliable" stockpile of nuclear weapons can be "safe" because this implies that the weapons can be used and would work if they were to be used. This in fact is the ultimate hazard to all mankind, and a threat to all of our futures like no other. I grew up under this threat or cloud over my life and it has been my hope that my children and future grandchildren would not have to. American leaders have been reckless with this power in the past and, along with the Russians, have played "russian roulette" with all of our futures, even the existence of future generations. We have been lucky so far and have survived so far only through luck or the grace of God. We can't count on being lucky like that every time. The odds are just too much against it. Anybody who is "positive" about nuclear weapons or thinks the jobs manufacturing them brings are worth it should read "The Road" bY Cormac McCarthy. This describes the life of the survivors in a "nuclear winter" in the southeast U.S. region where we live. A once green land is now dead and devoid of almost all life, and the uncertain life of those who struggle on seems almost worse than no life at all. I believe that this is a realistic future if these devices are used on a large scale.

3|16A
4|7M.1

America presently has no enemies that can challenge its power with weapons of mass destruction (although the nuclear stockpiles of the former Soviet Union remain dangerous.) But a continuing aggressiveness and swagger with these weapons invites competition since no one likes to be threatened and dominated nor will they tolerate it for long. Therefore the only sane way forward is a renuciation of these weapons by the greatest powers first as an example to be followed.

5|1J.1

The Complex Transformation proposal is to have the capability to produce up to 125 new nuclear weapons per year. Why? We already have way too many, and American leaders seem to go ballistic if another country looks like they are trying to build even one. I would rather other countries not go the nuclear route also, but if they think they have to do this to be respected by the "big boys" they will of course. The U.S. government is the only government in the world over which we have any control, or should have since this is supposed to be a government "of the people, by

6|3A

Brown, Rick
Page 3 of 3

the people, and for the people". Let's start here.

Making these bombs here in east Tennessee puts a target on our backs. We don't want this. Jobs shouldn't be an issue. This isn't about keeping jobs for the current plant workers anyway. Dismantling the weapons and cleaning up the mess will keep them busy until they retire. No, this is about creating new jobs and wealth for contractors. New jobs can and should be created here in clean industries and energy efficient technologies of the future. There are a thousand ways that the same money could be better spent that would be a real benefit to people here instead of creating a hazard and a dark cloud over our daily lives.

7|7C
8|7J.2
9|9B

I hope you will consider these comments before proceeding further with this project.

Sincerely,

Rick Brown

Rick Brown
1084 Lindsey Drive
Sevierville, Tennessee 37876
rick.brown@earthlink.net

Brownrigg, Joseph
Page 1 of 1

PC_1110

Levens, Matthew

From: Joseph W. Brownrigg [joebrownrigg@yahoo.com]
Sent: Monday, March 31, 2008 2:12 PM
To: Complex2030
Subject: nuclear weapons

Joseph W. Brownrigg
4821 Solecito Circle
Santa Fe, NM 87507-2780

March 31, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|10 B The DOE is once again attempting to create buildings and bombs. The current plan at our local Los Alamos lab includes a new building and creating new pits for nuclear weapons. This has already been rejected by Congress once...but the DOE has put it back into the proposed budget.

Enough is enough!

2|16A We do not need more pits. By the record of our own nuclear safety committee we have more than enough pits, including the ones on deactivated missles and bombs.

3|1J New, re-worked pits designs are NEW weapons. This is a violation of the Nuclear Non-proliferation Treaty.

1|10B (cont); 4|9B; The current rage at Los Alamos is merely a building of private disaster capitalism. It is a "for profit" enterprise. We cannot afford this expense, especially when our economy is in such shambles, our health system is dysfunctional and our schools are failing.

3|1J (cont. Our hypocrisy is destroying our role in the world and our hearts at home.

2|16A (cont). The CMRR program, to name one specific program, needs to be totally and completely denied...NOW. We may well never have this chance again.
Buildings and personnel created to build pits, inevitably, lead to manufacturing more pits. NO! ABSOLUTELY and FOREVER. There is NO reason to go down this immoral, dysfunctional, politically destructive, and economically killing road.

Sincerely,

Joseph W. Brownrigg

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Brunnhoelzl, Nicole
Page 1 of 1

PC_1172

Levens, Matthew

From: Nicole Brunnhoelzl [cnbx3@mtaonline.net]
Sent: Thursday, March 27, 2008 1:26 PM
To: Complex2030
Subject: No more nukes

Nicole Brunnhoelzl
11231 Amfay Dr.
Palmer, AK 99645-8879

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A; 2|1J I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons at Los Alamos or elsewhere.

I'm also opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal.

3|9B It is imperative that we wake up, re-focus and put our efforts into helping our environment and other humanitarian efforts rather than the further destruction of life on our planet.

Sincerely,

Nicole Brunnhoelzl
907 746-1153

1

Bryant, Ellen
Page 1 of 1

PC_660

Levens, Matthew

From: millinerymadness@yahoo.com
Sent: Saturday, April 05, 2008 12:34 PM
To: Complex2030
Subject: "SIMPLE"....Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|9A To me this looks like just another scam to separate the taxpayer from the taxpayer's money. Just another "make work" project designed for the explosion of the world and the implosion of US(A).

What's happened to US(A)?
What's happened to the "well-fare" of "we the people"?

Our quality of life is in the "toy-toy", the majority of our children are "dummied-down" and not even taught vocational skills, our bridges and roads are failing, etc.

NO MORE MONEY FOR PLANS TO DESTROY THE WORLD....

Sincerely,
Ellen Bryant
3545 M St
Eureka, CA 95503

cc:
Senator Dianne Feinstein
Senator Barbara Boxer
Representative Mike Thompson

1

Brynestad, Astrid
Page 1 of 1

PC_375

Levens, Matthew

From: astridb@comcast.net
Sent: Wednesday, February 27, 2008 9:21 PM
To: Complex2030
Subject: SPEIS Input

1|15A; 2|5C I would like to add my voice to the chorus of those supporting the continuation and growth of the Y-12 National Security Complex as a key player in the weapons complex. Y-12 has the expertise and community support to fulfill the roles specified in the NNSA Preferred Alternative Plan which includes locating the Uranium Processing Facility at Y-12. Selection of this option is the best for the country, the weapons complex, and the east Tennessee community.

I have lived in Oak Ridge most of the past 44 years. Y-12 is an integral and valued part of our community; we support Y-12 and Y-12 supports the community by providing jobs and contributing to community charities, education, and other efforts to keep our community a great place to live and raise our families, many of whom will grow up to be Y-12 employees.

I, and many other locals, can't help but notice that the majority of the most vocal opponents of Y-12 are out-of-towners if not out-of-staters. They are certainly welcome to make their feelings heard, but I hope you place greater weight on the input of the home-towners -- we resoundingly want a vibrant Y-12 to be here!

Thank you for your consideration,
Astrid Brynestad

1

Buck, Lynn
Page 1 of 2

PC_921

3009 9th St. NW
Albug. NM 87107
April 1, 2008

Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Ave., SW
Washington, DC 20585

Re: Draft Complex Transformation SPEIS Comments

Dear Mr. Wyka,

1|2E — Firstly, I would like to request an extension of the comment period on the Complex Transformation. April 9 is too soon.

2|16A
3|3A
4|1F — Secondly, I'm letting you know that I oppose the Bombplex for several reasons. First of all, we do not need to manufacture 20 to 200 pits a year (which is it?), because we signed the Nuclear Non-Proliferation Act, AND because we have already 14,000 surplus pits in Pantex, Texas. The second reason I oppose the pit production facility is that we already have nuclear waste which has been improperly handled here in New Mexico. We have nuclear seepage into drinking water in Los Alamos & Santa Fe, and the Rio Grande river. We have improperly stored waste at Sandia National Labs in open air dumps that SNL refuses to handle properly or even MONITOR properly. The DOE admits to having 100,000 cu. ft.. The EPA documents acquired through FOIA records 720,000 in 1989. This all sits above the aquifer that supplies Albuquerque's drinking water. It is also upriver of the new Mesa del Sol development as well as Isleta Pueblo. This improper storage is similar to what happened in Rocky Flats. The improper handling of radioactive materials there was criminal, and was finally shut down by the FBI. Health cost to the people of Colorado is immeasurable. We do not want that here.

5|14E
6|14M.2
7|14M.3

The entire program is unnecessary. We already have 14,000 pits. This is a welfare program for physicists. New Mexico is already the national nuclear wasteland and it has not helped our state.

8|9B — We are near the bottom of the list on Health Care and in education in our state. Our nuclear economy brings money to our state, but it has not helped our state.

Buck, Lynn
Page 2 of 2

8|9B (cont)

In closing, extend the comment period AND don't do this to our state.

Thank you,
Lynn Buck

Lynn Buck
3009 9th St NW
Albuquerque, NM 87107
(505) 842-8505

Bucklin, Susan

Page 1 of 2

Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement— PC_993
U.S. Department of Energy
National Nuclear Security Administration

NNSA National Nuclear Security Administration

3-10-08
Albuquerque Convention Ctr.

Written Comment Form

Must be received on or before April 10, 2008.

1|16A

It is unconscienable and immoral to allocate any more tax dollars, brain power or other resources toward the production of new nuclear weapons components. These resources exist in large, but not unlimited, quantities and there are much larger problems looming for our country toward which we must direct these resources. The top priority for these resources should be ~~the~~ a TRUE TRANSFORMATION of all nuclear facilities into centers whose primary mission is to streamline methodologies which will secure all nuclear

2|9B

materials in the US and world wide. The purpose of securing this material will be to remove it ~~or~~ and/or guard it against any use and determine the most effective ways to ensure that nuclear technology will be a legacy of the past, that we use to educate future generations ~~about~~ but never again USE. Hopefully after this LARGE set of priorities is addressed there will be ~~no~~ resources (tax dollars and brain power) left to address →

Please use other side if more space is needed.

Comment forms may be mailed to:
Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Comment forms may be faxed to:
(703) 931-9222
or sent by electronic mail to:
complextransformation@nnsa.doe.gov

You may also submit comments through the project website which can be found at:
http://www.complextransformationspeis.com

Albuquerque, nm

Bucklin, Susan

Page 2 of 2

2|9B (cont.)

planet with all the other humans and myriad life systems that humans depend on. These are urgent problems requiring immediate attention, whereas the so-called threats that proponents of nuclear war technology allude to are only vague possibilities.

Thank you and please allow my ~~[illegible]~~ comments to be reflected in the record of decision.

Susan Bucklin
2915 Burton SE
Albuquerque, NM 87106

Buckner, J
Page 1 of 1

PC_794

Levens, Matthew

From: Wyka, Ted
Sent: Friday, February 22, 2008 9:15 AM
To: Complex2030
Subject: Fw: Transformation of the Nuclear Weapons Complex

----- Original Message -----
From: J. Keith Buckner <jkbuckner@adaptivemethods.com>
To: Wyka, Ted
Sent: Fri Feb 22 09:11:04 2008
Subject: Transformation of the Nuclear Weapons Complex

Dear Sir,

15A My name is Keith Buckner and I am the Vice President of Manufacturing for Adaptive Methods, Inc having corporate headquarters near Washington DC and my regional office located in Chattanooga, Tennessee. I've had the privilege of reviewing the options being discussed for NNSA Complex Transformation. I may or may not be able to attend a hearing to be held in Oak Ridge, Tennessee on 26 Feb, however I did want to express my opinion and belief that it will be in the best interest of our region and our nation to pursue a path toward distributed centers of excellence which would continue a uranium mission at the Y-12 Complex and the construction of a new Uranium Processing Facility on that site. Oak Ridge and Y-12 have a long and proven history of being able to meet our nations' security and advanced technology needs and should continue that legacy.

Regards,

J. Keith Buckner

Buckner, Sally
Page 1 of 1

PC_395

Levens, Matthew

From: bucknersb@bellsouth.net
Sent: Wednesday, March 19, 2008 5:41 PM
To: Complex2030
Subject: For a sensible world...

Theodore Wyka, Complex Transformation SPEIS Manager Office of Transformation, NA-10.1 U.S. Department of Energy/NNSA Washington, DC 20585

Dear Mr. Wyka,

1|1J let's stop telling other nations (such as Iran) that they can't have any nuclear weapons while we continue to manufacture more--even though we have enough to end human life forever on this planet.

2|5G I appreciate the Department of Energy's making plans to consolidate and reduce the facilities, workforce, and redundant capabilities within the nation's nuclear weapons complex.

3|3A However, the Complex Transformation plans puts too much emphasis on recreating research, development and manufacture or new types of nuclear weapons. Our country still maintains thousands of nuclear weapons and has thousands more in storage--far more than enough to maintain a credible nuclear deterrent for the foreseeable future. We do not need the capability to make more or newer nuclear weapons.

1|1J (cont.) In addition, Complex Transformation undermines U.S. efforts to stop the spread of nuclear weapons around the world. In addition, Complex Transformation undermines U.S. efforts to stop the spread of nuclear weapons around the world. It sends the wrong message to the world by instilling a false sense of confidence in the ability of these weapons to increase security.

4|7O 5|7F; 6|7E Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE should focus on shrinking the still-oversized nuclear weapons complex and on maintaining the safety and security of our existing weapons arsenal as the size of our nuclear stockpile is reduced.

Sincerely,
Sally Buckner
164 Wee Loch Drive
Cary, NC 27511

1

Buechler, Hope

Page 1 of 1

PC_1369

Levens, Matthew

From: Hope Buechler [HopeB@kitcarson.net]
Sent: Friday, April 25, 2008 1:12 PM
To: Complex2030
Cc: Hope Buechler
Subject: LANL - plutonium pit production

Dear Department of Energy people,

Making more plutonium pits at LANL is not a good idea: it may be that DOE, in a rush to implement a policy that will expire in eight months under a new administration, is proceeding without considering the following:

1|3A No need for new plutonium pits - existing pits last 100 years and we have more than sufficient as a deterrent.

2|1J Non-proliferation agreements with other nations will be broken: we will lose the moral authority to object to other nation's nuclear expansion.

3|14O Contamination of the LANL site which has a 65 year legacy of pollution of soil, water and air; waste is still buried in unlined trenches and cleanup is way behind schedule.

Fault lines indicate possible earthquakes at the site.

4|9B The considerable expense: money would be better spent using the scientific expertise at LANL to develop alternative energy sources.

Please extend the comment period beyond April 30. Believe me, citizens of Northern New Mexico who will be affected, have constructive ideas about LANL and should be heard.

Thank you. Hope Buechler Box 665, Arroyo Seco, NM 87514 505-776-1580

1

Buechley, Larry

Page 1 of 1

04/29/2008 20:37 5056892445 BUECHLEY WOODWORKING PAGE 01

PC_941

Larry Buechley
Box 21 El Valle Rt.
Chamisal, NM. 87521

April 29, 2008

Ted Wyka NNSA
Office of Transformation NA-10.1
1000 Independence Ave. SW
Washington, DC 20585

Dear Mr. Wyka,

1|7O I believe that the no action plan is the best of the possible options for the LANL Complex transformation. Some big changes should happen at LANL, but they should not be to increase pit production for nuclear weapons.

2|1J The world is in a state of rapid change now. We are in a state of tremendous confrontation with growing forces in the middle east and the far east. Building more pits, especially for new weapons designs will only add to those tensions. We will have no foot to stand on when trying to encourage other nations to shut down nuclear programs. We should be reducing our own nuclear capacity and asking other nations to join us.

3|14M.3 The history of previous pit production is a legacy of superfund sites. Los Alamos already is seeping radionucleotides into the Rio Grande. We are doing harm to our international standing while we are destroying the very soil we wish to protect.

4|7J; 5|9B LANL should redirect its core purpose towards cleaning up the mess already there from previous bomb design and production work and put it's sizable talents toward solving our huge global warming and energy issues. That would be a great twenty first century Manhattan Project. We have little time to waste.

Sincerely,

Larry Buechley

Buechley, Nancy
Page 1 of 1

04/27/2008 13:59 5056892445 BUECHLEY WOODWORKING PAGE 01

Nancy Buechley
El Valle Route, Box 21
Chamisal, NM 87521

PC_943

April 27, 2008

Ted Wyka, NNSA
Office of Transformation NA-10.1
1000Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka,

1|16A I don't know where to begin with my comments. The Complex Transformation plan seems wrong and bad in so many important ways: for national security, world relationships, the environmental, and the economy.

2|3A 3|5C.1 First of all, there is little need, from a national security stand point, for continued pit production. We have enough reusable pits to maintain our nuclear stockpile for ages to come, and we have enough nuclear weapons to annihilate much of the world right now. So there is no need for further manufacture of nuclear pits or nuclear weapons. Instead, the continued efficacy of delivery of these weapons should be the focus of our research. This *is* the aspect of our weaponry that could be affected by changes in technology.

4|1F Secondly, shouldn't we be concentrating on nuclear nonproliferation and peace? Why aren't we researching ways to maintain our security in such a way as to move towards lessoning our dependence on nuclear weapons? We committed to this goal in the *1970 Nonproliferation Treaty*. How can we expect other countries to forego nuclear weapons when we continue to develop them ourselves, despite having agreed to do otherwise?

5|14M.3 Next, what happened at Rocky Flats shows that the legacy of industrialized pit production is environmental disaster. And, unlike Rocky Flats, Los Alamos sits high on a plateau over the Rio Grande valley, and any toxic wastes released there will spread for hundreds of miles and endanger many, many people. And besides this, the current plans for dealing with the increased waste generated are incomplete and suspect.

6|9H 7|7J Lastly, our country is now experiencing an economic slowdown, and it seems that these gigantic expenditures to build a new facility for increased pit production (which we arguably don't even need!) is an unwise use of taxpayer dollars. The Department of Energy doesn't even budget enough money for Los Alamos to meet the deadlines that they agreed upon for cleaning up past contamination. If they can't meet current obligations, where will the *money* for new facilities going to come from?

8|7O I believe that the "No Action" alternative is preferable. This will allow time for the next administration to review our nuclear weapons policy, and this is as it should be.

Very truly yours,

Nancy Buechley

Nancy Buechley

Buller, Jan
Page 1 of 1

PC_1622

Levens, Matthew

From: jan_buller2000@yahoo.com
Sent: Saturday, April 05, 2008 1:25 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|16A In a nutshell--I still support and advocate Nuclear disarmament.
Whatever weapons are present will eventually be used. So just get rid of them--all of them!!

Sincerely,
jan buller
1527 Pine Street
Silverton, OR 97381

cc:
Senator Ron Wyden
Senator Gordon Smith
Representative Darlene Hooley

1

Bunbury, Janet
Page 1 of 1

PC_210

Janet Bunbury
115 Marshall Street
Watertown MA 02472 4709
617 926 4419

4 March, 2008

Mr. Theodore Wyka.
Document Manager of
Complex Transformation
U.S. Government, D.C.

Dear Sir.

1|16A Please do not let "Bomplex" or any other nuclear weapons be constructed. This Administrations successive plans for weapons
2|1K addressing changed 'enemy' situations is leading our nation into a quagmire of antagonism around the world.

3|1J More weapons will not solve the geopolitical activities we are exacerbating even as diplomats engage in negotiations.

72% of U.S. citizens have voiced opposition to more nuclear weapons and
4|1F are calling for U.S. compliance with the Nonproliferation Treaty to which we committed some forty years ago.

Please take these words of an 88 yearold grandmother to heart and to the Congress.

Yours sincerely.

Janet Bunbury.

Bunting, Dorela
Page 1 of 1

PC_922

Theodore Wyka
Complex Transformation
US Dept. of Energy
1000 Independence Ave SW
Washington DC 20585

April 2, 08

Re: Complex Transformation

Dear Mr. Wyka,

1|16A I oppose the DOE's Bombplex Transformation
2|1F because our country is committed by international treaty to reduce our stockpile and phase out nuclear weapons. For years our country insisted that there was no point in making treaties with the USSR because it was untrustworthy.

3|2E I urge extending the comment period. Americans should have the right to have a say on a defense policy decision that threatens all life on earth. This when we are faced with possible extinction from global warming.

Sincerely,
Dorela F. Bunting
3423 Smith Ave SE #1
Abq NM. 87106

Burgess, Margaret
Page 1 of 1

Complex Transformation Comment Page 1 of 1

PC_1485

Buenaflor, Delight

From: Margaret Burgess [mburgess@lanl.gov]
Sent: Wednesday, April 09, 2008 8:13 PM
To: DIV.Complex.Transformation
Subject: Complex Transformation Comment

1|16A I support NNSA's preferred alternative, particularly the distributed centers of excellence alternative. One of my reasons for supporting the distributed centers of excellence is that our water supply is very limited.

I am an employee of LANS, LLC.

--

Margaret Burgess
Communication Arts and Services Group
Los Alamos National Laboratory, MS D416
TA-3-28
Phone: (505) 667-6376
Fax: (505) 665-5097

Burke, Carol
Page 1 of 1

PC_1298

Levens, Matthew

From: Carol Burke [burkect@aol.com]
Sent: Saturday, April 19, 2008 2:27 PM
To: Complex2030
Subject: Please reject plans to produce plutonium pits for future nuclear weapons....please!!

Carol Burke
1050 W. Beal
Flagstaff, AZ 86001-1125

April 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

I am also opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal.

2|1J It may seem like protection for the US, but in reality, it would more likely further the desire and intention of many other countries to continue with their own nuclear arsenal buildup, which is a very dangerous prospect for all of us.

It is something that should be rejected, period.

Sincerely,

Carol Burke
9287743216

1

5/28/2008

Burnham, Antoinette

Page 1 of 1

PC_1708

Levens, Matthew

From: Antoinette Burnham [aburnham5@hotmail.com]
Sent: Friday, March 28, 2008 11:01 PM
To: Complex2030
Subject: Stop new nukes

Antoinette Burnham
3233 Woodbrook Rd.
Toledo, OH 43617-1136

March 28, 2008

Complex Transformation

Dear Complex Transformation:

Thank you for the opportunity to comment on the Complex Transformation plan now being considered.

1|16A I find the name of the plan itself mystifying. Exactly what are we transforming? I thought that we were committed to nuclear arms reduction.
I am opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal.

2|1J How can the U.S. justify building new nuclear warheads and demand that other countries not have a nuclear capability? Isn't that a bit two-faced?
What kind of an example does that set? What about putting the $155-175 billion that the

3|9B GAO estimates Complex Transformation will cost between now and 2030 into domestic programs (education, health care, the environment, etc.) and conflict resolution programs, thereby showing the rest of the world what a great democracy looks like.

Sincerely,

Antoinette Burnham
727-348-9983

Burt, Susan

Page 1 of 1

PC_1545

Levens, Matthew

From: Susan Burt [smburt@ilstu.edu]
Sent: Tuesday, April 08, 2008 9:54 PM
To: Complex2030
Subject: no new plutonium, please

To the Department of Energy,

1|14O I write to comment on the plan to produce between 50 and 80 new plutonium "pits" annually. Such a move would increase drastically the environmental degradation caused by the production of nuclear weapons.
It would send a signal that the United States believes it is threatened by other nation-

2|1J states, and plans to strike first at some enemy. In other words, it re-engages the nuclear arms race, something that most of us would like to relegate to the dreary history of inhuman, indecent excesses of the twentieth century.

3|9B The cost of this mis-guided move would also be excessive, at a time when our national economy has been ruined by the skyrocketing military spending of the Bush administration, as well as the subsidies to the already super-rich. We do not have the money to spend arming ourselves against imaginary enemies.

As the Department of Energy, you should instead be putting research energy and imagination into specific, accessible, and feasible measures to reduce our nation's energy consumption, particularly of fossil fuels. Please work on trying to stop and reverse the process of global warming that threatens us all. But for heaven's sake--for everyone's sake--do not even consider further ludicrous, dangerous, profligate, regressive, bellicose moves like this appalling proposal to create new nuclear warheads.

Sincerely,

Susan Meredith Burt

602 Normal Avenue
Normal, IL 61761

1

Busch, Ruth
Page 1 of 1

PC_1522

Levens, Matthew

From: Ruth Busch [betzy@aol.com]
Sent: Tuesday, February 19, 2008 6:38 PM
To: Complex2030
Subject: Nothing new for nukes!

Ruth Busch
6077 County Road 290
Lafayette, AL 36862-5325

February 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

Perhaps you are too young to remember how horrible everything to do with nuclear weapons is.

1|16A

My dad was a metallurgist in the Manhattan project and flew out to witness the underwater test. He is now diseased, but he knew.

Don't approve building anything that moves the production of nuclear weapons closer. The CMRR project is irresponsible and should be rejected.

Sincerely,

Ruth Busch
334 749-8474

Busch, Ruth
Page 1 of 1

PC_1211

Levens, Matthew

From: Physicians for Social Responsibility [webmaster@psr.org] on behalf of Ruth Busch [betzy@aol.com]
Sent: Thursday, April 03, 2008 5:07 PM
To: Complex2030
Subject: The U.S. doesn't need new nuclear weapons

Apr 3, 2008

Mr. Theodore Wyka
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Wyka,

1|16A

We don't need new nuclear weapons.
Americans think WE won the cold war thru MAD. Actually, the USSR lost the cold war because they spent too much money.
We must not make the same mistake!
Read what Ike had to say at the end of his presidency.

Sincerely,

Mrs. Ruth Busch
6077 County Road 290
Lafayette, AL 36862-5325

Busching, Beverly

Page 1 of 1

PC_1928

Levens, Matthew

From: Beverly Busching [bbusching@mindspring.com]
Sent: Monday, April 28, 2008 1:19 PM
To: Complex2030
Subject: Complex Transformation

Beverly Busching
133 W Berger St
Santa Fe, NM 87505-2615

April 28, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

Mr. Theodore Wyka,

1|C1; 2|8A The United States does not need a site to produce new plutonium pits, as the JASON group research clearly found out -- there is no need to replace aging warheads. Congress refused the last request by the Energy Dept by defunding the RRW.

3|10B We citizens of New Mexico want Los Alamos to be a center for research that benefits humankind, such as the vital research into detection methodology for Russian nuclear material.

4|16A We call for the Dept of Energy to make a positive contribution to our life, rather than pursuing unwise and destructive projects such as the Chemistry and metallurgy research Replacement project.

Especially now, with a new president and new legislators coming to Washington, this is not the time to enact such foolish commitments.

cc: legislators

Sincerely,

Beverly Busching

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Butler, Judith

Page 1 of 1

PC_1403

Levens, Matthew

From: Judith Butler [jabutler216@yahoo.com]
Sent: Tuesday, April 29, 2008 11:17 PM
To: Complex2030
Subject: No more nuclear weapons

Judith Butler
10202 E Ferret
Spokane Valley, WA 99206-9277

April 29, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

2|1J A major nuclear warhead production would be a huge mistake as the U. S. is asking others to forego developing nuclear weapons.

This project should be rejected.

Sincerely,

Judith Butler
509-928-0216

Butler, Marcie

Page 1 of 1

PC_396

Levens, Matthew

From: Butler, Marcie R (LRM) [butlermr@y12.doe.gov]
Sent: Wednesday, February 27, 2008 1:37 PM
To: Complex2030
Subject: SPEIS Comment

Mr. Wyka:

1|15A; 2|18A I attended the public hearing yesterday on the Complex Transformation SPEIS held in Oak Ridge, Tennessee. I have worked at the former K-25 facility and now work at Y-12...for a total of 30 years. I did not speak yesterday, but do want to convey my support for the Preferred Alternative Plan. The employees here are some of the most dedicated employees you would ever run into. Everyone is so excited to see all the changes that have been taking place over the last several years....downsizing and demolition of old buildings and the modernization activities that are already on-going. All employees in my group are heavily involved in "transformation" projects to make our organization the best it can be. My job here also allows me to see the involvement of not only the 4,000-plus employees here but also the many suppliers in the surrounding counties who do their best everyday to support this facility which supports the nation. The thought of what it would do to possibly ever "close down" the Y-12 facility is devastating to think of...not only what it means to the Y-12 family but also all the other men and women in this region who support us. We truly hope to continue our heritage and we look forward to a bright future that continues to support our nation; and I feel the "preferred alternative plan" would meet the needs of the country and also support our wonderful region here in Tennessee.

Thank you for allowing us to comment.

Marcie R. Butler
B&W Y-12
Oak Ridge, Tennessee

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Byers, Reid

Page 1 of 1

PC_698

Levens, Matthew

From: Reid Byers [rsbyers@us.ibm.com]
Sent: Wednesday, January 16, 2008 9:58 AM
To: Complex2030
Subject: What is SPEIS Thinking?

Mr. Wyka:
Most Americans, almost 80%, do NOT want new nuclear weapons.

I am very upset that SPEIS still holds a goal of creating new weapons after Congress has spoken so clearly against it.

1|16A It does not make sense to proceed with a goal like this when policy reviews are happening and the public opposes it.

Is this not clear?

Thank you,
Reid Byers
Princeton, NJ

Reid Byers
56 Bayard Lane
Princeton, NJ 08540

609 497 1020

1

Caldeira, Virginia

Page 1 of 1

PC_1253

Levens, Matthew

From: Virginia Caldeira [vcal@optonline.net]
Sent: Thursday, March 27, 2008 12:16 PM
To: ComplexZ030
Subject: No more nuclear weapons please

Virginia Caldeira
64 Academy Circle
Oakland, NJ 07436-2651

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

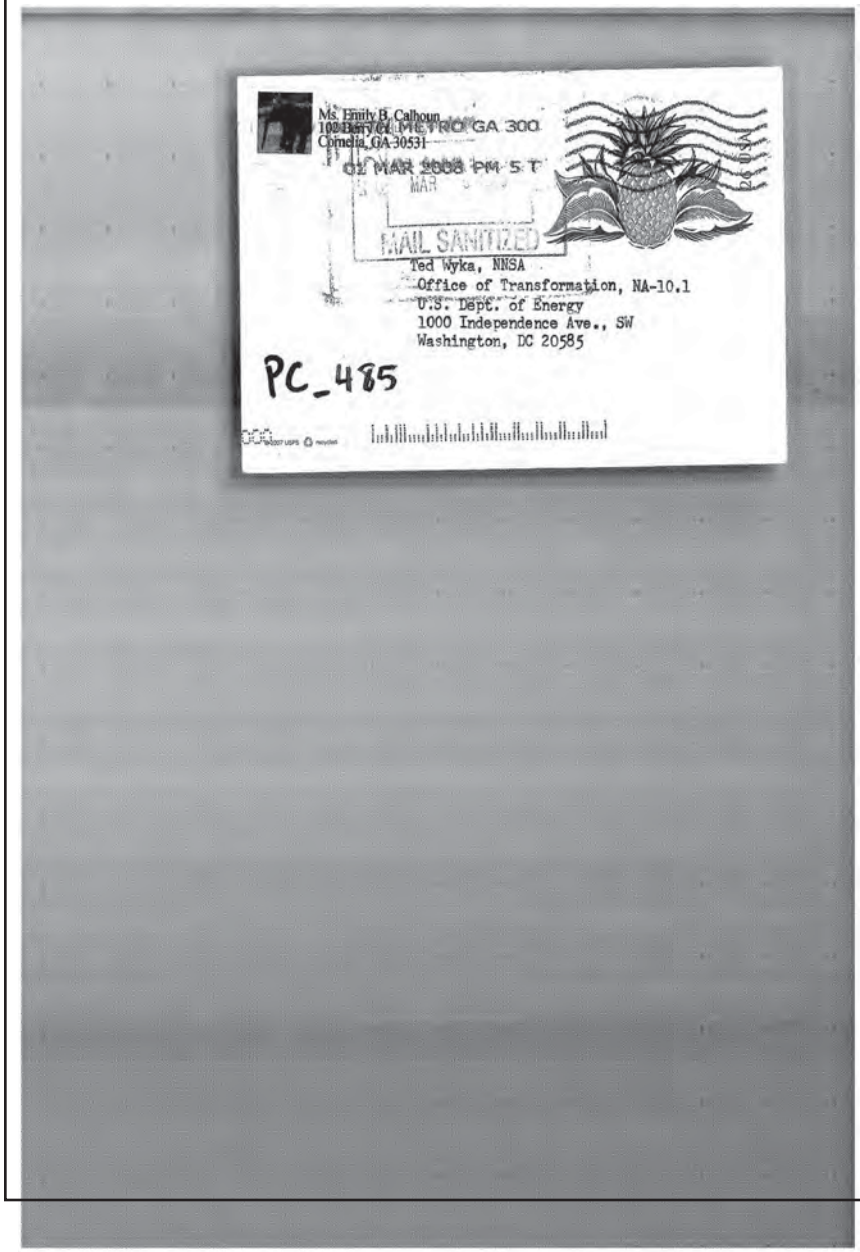
1|16A There is no good reason to build new nuclear weapons or any facilities which would encourage their manufacture. Please NO new nuclear weapons of any kind.

Sincerely,

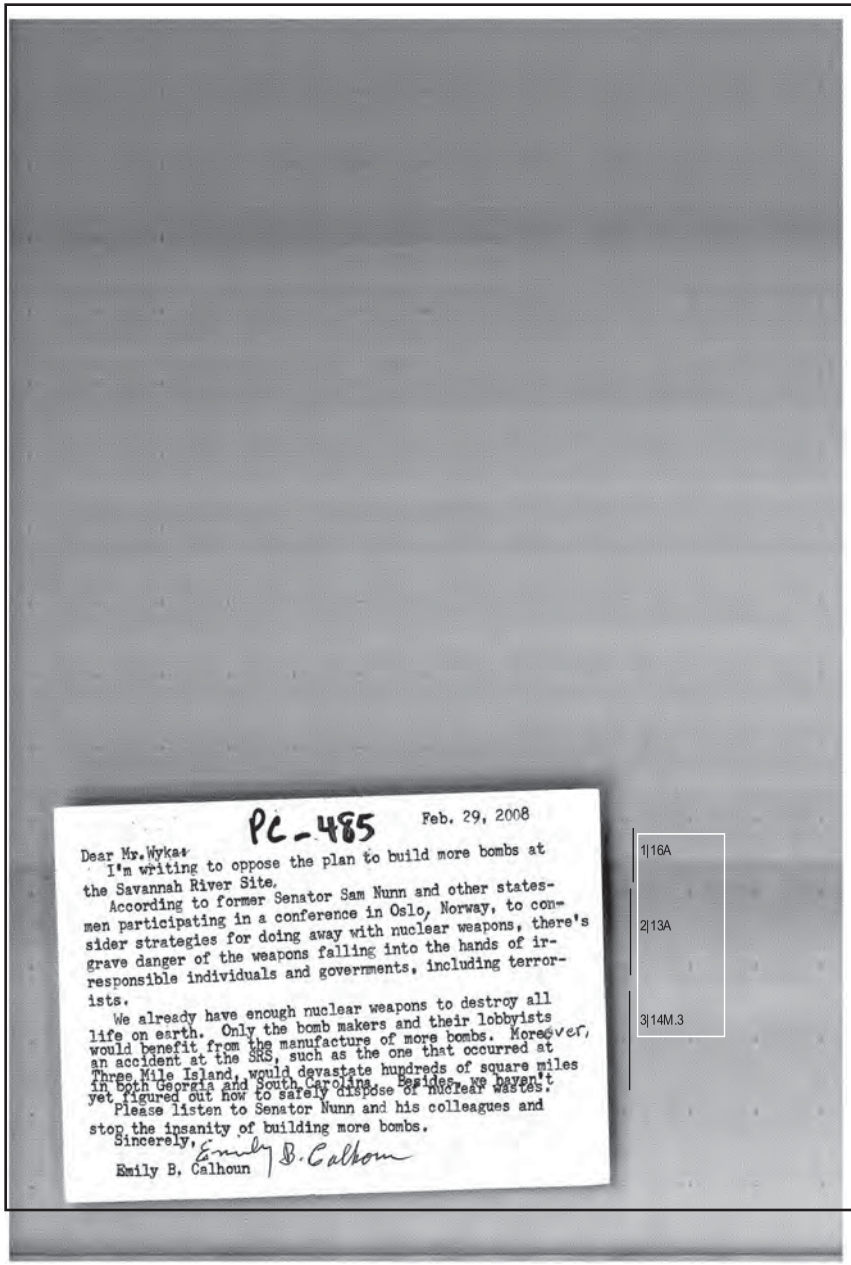
Virginia Caldeira
0000000000

Calhoun, Emily

Page 1 of 2



Calhoun, Emily
Page 2 of 2



PC-485 Feb. 29, 2008

Dear Mr. Wyka:
I'm writing to oppose the plan to build more bombs at the Savannah River Site.
According to former Senator Sam Nunn and other statesmen participating in a conference in Oslo, Norway, to consider strategies for doing away with nuclear weapons, there's grave danger of the weapons falling into the hands of irresponsible individuals and governments, including terrorists.
We already have enough nuclear weapons to destroy all life on earth. Only the bomb makers and their lobbyists would benefit from the manufacture of more bombs. Moreover, an accident at the SRS, such as the one that occurred at Three Mile Island, would devastate hundreds of square miles in both Georgia and South Carolina. Besides, we haven't yet figured out how to safely dispose of nuclear wastes.
Please listen to Senator Nunn and his colleagues and stop the insanity of building more bombs.
Sincerely,
Emily B. Calhoun

1|16A
2|13A
3|14M.3

Calkins, Joanne
Page 1 of 1

PC_2011

Levens, Matthew

From: Joanne Calkins [joqi@comcast.net]
Sent: Monday, April 28, 2008 1:07 AM
To: Complex2030
Subject: Please no complex transformations in New Mexico

1|16A Thank you for extending the date for comments from New Mexicans on the complex transformationas. We the people of New Mexico do not want any more nuclear activity of any kind within the borders of our fair state. Since we will be directly affected by your proposal, we hope that you are listening when we say we don't want new replacement warheads. We don't want any warheads. Take your program somewhere else, or better yet, get rid of the warheads we've got altogether.

Joanne Calkins

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Calkins, Joanne
Page 1 of 1

PC_520

Buenaflor, Delight

From: Joanne Calkins [joqi@comcast.net]
Sent: Wednesday, March 05, 2008 10:47 PM
To: DIV.Complex.Transformation
Subject: No complex transformations in New Mexico or USA, please

1|16A I do not believe that we need any new nuclear weapons. In fact, I believe that we should decommissioning the ones we already have. As Albert Einstein said, we cannot simultaneously prepare for war and work for peace. We need to start putting more of our efforts into insuring peace in the world by cooperating and negotiating instead of trying to militarily dominate and threaten the whole world.

I particularly object to any further weapon development in my state of New Mexico which has already been exploited by the weapons industry. We now have a chance to begin working on projects to affirm life rather than threaten life on earth. New Mexico has vast resources for providing clean energy to ourselves and others in the US. This is where I want the scientific emphasis to be in my state and my nation for the future of all mankind.

Joanne Calkins, native New Mexican

Calkins, Mary
Page 1 of 1

PC_639

Levens, Matthew

From: Mary Calkns [mcalkins517@fuse.net]
Sent: Sunday, March 16, 2008 6:10 PM
To: Complex2030
Subject: Complex Transformation

Mary Calkns
4604 Heger Drive
Cincinnati, OH 45217-1412

March 16, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I disagree with the administration's proprosal to build a plan to produce plutonium pits for nuclear weapons.

I am also opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal.

It seems ironic to me that President Bush and Sen. John Kerry, in the last election, when asked what was the greatest threat to our world today, answered simultaneously, "Nuclear proliferation." It seems now that this meant everybody else's proliferation, but not that of the United States.

2|1J Building the proposed plant would encourage other countries to keep up with us and add to their own arsenals.

1|16A (cont) This program should be rejected. We should be setting the example for other countries to reduce these dangerous arsenals. We should be seeking and working toward a world without nuclear weapons. This needs to begin at home.

This proliferation of weapons affects me by making my world more dangerous, and it saddens me to think that the country I love is contributing to the "culture of death" when we profess to be bringing life and freedom to the world.

Sincerely,

Sister Mary Lynne Calkins
513-641-0799

Callaghan, Jean

Page 1 of 1

PC_1628

Levens, Matthew

From: jean.callaghan@aya.yale.edu
Sent: Saturday, April 05, 2008 12:49 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|1F The US is a signatory of the Nuclear Non-Proliferation Treaty, which obligates us to work to REDUCE the number of nuclear weapons, not increase our arsenal. We already have more than too many nuclear weapons and events over the past few years have shown that our 2|3A record for safely securing them is none too stellar.

3|1K I do not trust this administration with any powers that would increase the research and development of new nuclear weapons. Their corrupt cronyism and lack of enforcement of law and regulation means that they cannot be trusted neither to truthfully reveal what they are doing in this critical area nor to safeguard nuclear materials and any new nuclear weapons they should develop.

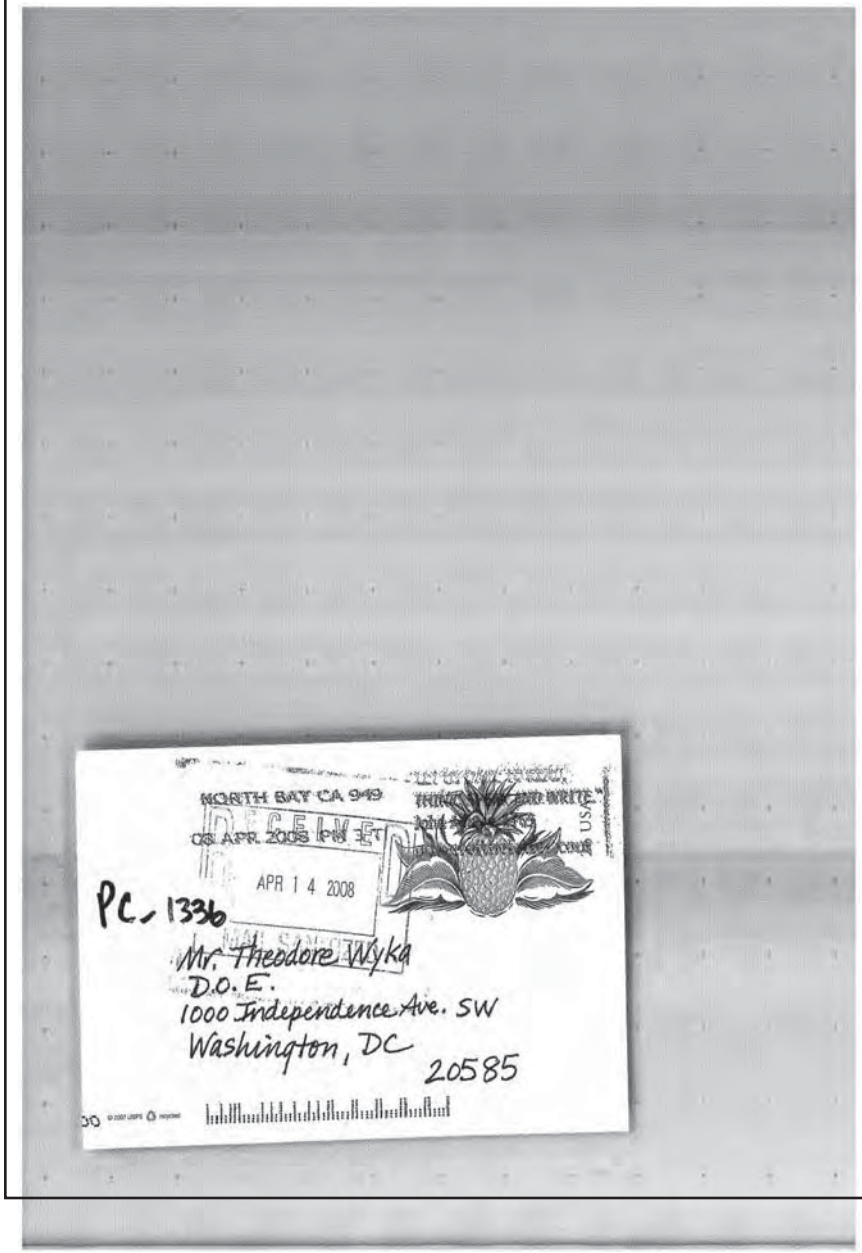
4|16A The US has a legal and moral obligation to reduce our nuclear arsenal, not increase it, and to secure and safeguard the nuclear weapons and nuclear facilities we already have. The DOE must concentrate on the safety and security of these weapons and facilities and not look to violate the law and should instead dedicate its efforts to deacrease our already too high risk of nuclear war, nuclear terrorism, and nuclear accidents.

I ask that you include my comment as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project. Thank you.

Sincerely,
Jean Callaghan
UMR 409 BOX 603
APO, AE 09053

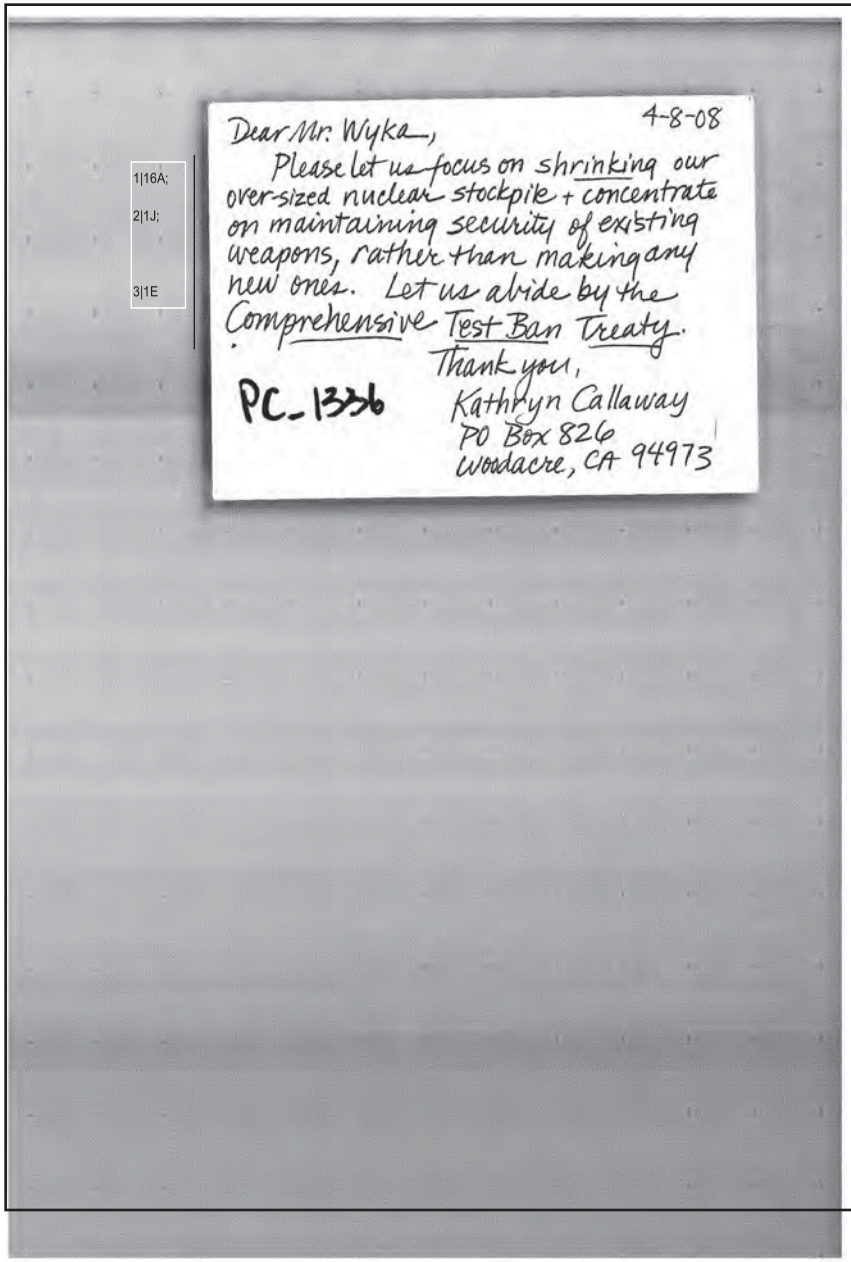
Callaway, Kathryn

Page 1 of 2



Callaway, Kathryn
Page 2 of 2

1|16A;
2|1J;
3|1E



Dear Mr. Wyka,

4-8-08

Please let us focus on shrinking our over-sized nuclear stockpile + concentrate on maintaining security of existing weapons, rather than making any new ones. Let us abide by the Comprehensive Test Ban Treaty.

Thank you,

Kathryn Callaway
PO Box 826
Woodacre, CA 94973

PC_1336

Campbell, Henry
Page 1 of 1

PC_397

Levens, Matthew

From: Campbell, Henry nmn (C17) [campbellh@y12.doe.gov]
Sent: Monday, February 11, 2008 2:37 PM
To: Complex2030
Subject: Complex Transformation

Gentlemen and Ladies:

My name is Henry Campbell. I live in west Knox County just outside Knoxville, Tn.

I have been employed at the Y-12 Complex, as a Pipefitter, for 26 years.

I support the Transformation and Modernization of the Y-12 Complex to make it more cost effective and responsive to our defense needs. I support the completion of HEUMF and the building of the New Uranium Processing Facility at the Y-12 site.

The Y-12 Complex has supported the defense mission of our country for more than fifty years, and will continue to do so as long as necessary.

1|15A;
2|5C;
3|18A

The loss of the New Uranium Processing Facility, would not only be a devastating blow to the Y-12 Complex, but also cause severe hardships on people, families, businesses and communities in the Oak Ridge and Knoxville areas, as well as a great number of people, families, businesses and communities outside these immediate areas.

There is a perception, at DOE for some reason, that labor and management at Y-12 do not get along. I can tell you from first hand experience that this is not true. A good example of our working together is this past years' United Way drive. Working together, as a team, we collected three quarters of a million dollars for this charity. This is only one example of many that occur every day on a routine basis.

So, I urge you, in your decision making, to show the people, families, businesses and communities of greater east Tennessee the same loyality as they have shown in support of our national defense mission here at
Y-12 all these many years.

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Cannon, Brian
Page 1 of 2

April 28, 2008

PC_977

Mr. Theodore Wyka
C-T SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Re: Public Comment to the draft Complex Transformation Supplemental Programmatic Environmental Impact Statement, DOE/EIS-0236-S4

Dear Mr. Wyka,

The Department of Energy (DOE) is proposing Complex Transformation, with a focus for expanding nuclear weapons manufacturing at Los Alamos National Laboratory (LANL).

1|14O; 2|2E I live in North Central New Mexico and have been and will be impacted by expanded nuclear weapons manufacturing at LANL through air emissions, discharges to water and burial of waste in the land. I just learned of the transformation complex document and request a 90-day extension of time to provide informed public comments to DOE.

My primary concern at this point is that DOE states "there are no agricultural activities present at LANL, nor are there any prime farmlands in the vicinity." p. 4-2. For DOE, a "vicinity" or "region of influence" is generally an area within a 50-mile radius of its facility.

3|14A DOE defines "prime farmlands" as "land that has the best combination of physical and chemical characteristics for producing food, feed, fiber, forage, oil seed, and other agricultural crops with minimum inputs of fuel, fertilizer, pesticides, and labor, without intolerable soil erosion, as determined by the Secretary of Agriculture (Farmland Protection Act of 1981, 7 CRF 7, paragraph 658)." p. 13-27.

On its face, a DOE claim that there are no prime farmlands in the vicinity of LANL is wrong. Before the Atomic Energy Commission arrived on the Pajarito Plateau in 1943, all this land was prime farmland. LANL is located within the food basket of Northern New Mexico.

Cannon, Brian
Page 2 of 2

[Add your story here.] Spend our $ on the Veterans of WAR on their health Benifits, a lot less $ than on New bombs. Will Gain more (attention positive) Than on WAR Bombs that have not been tested

4|9B

5|2B DOE must retract the draft Complex Transformation Supplemental Programmatic Environmental Impact Statement and reassess the LANL impacts to agriculture. Then DOE must submit the revised draft to the public for review and public comment.

Sincerely,

Print name and address:
BRIAN CANNON
P.O. Box 928 EL PRADO
N.M. 87529

cc: Senator Pete Domenici at (505) 988-6511, fax (505) 988-6514
Senator Jeff Bingaman at (505) 988-6647, fax (505) 992-8435
Representative Tom Udall at tom.udall@mail.house.gov
Representative Heather Wilson at (505) 346-6781, fax (505) 346-6723
Representative Steve Pearce at (505) 522-2219, fax (505) 522-3099
Governor Bill Richardson at (505) 476-2200
President Pro Tempore Tim Jennings at (575) 623-8331, fax (575) 623-9378
House Speaker Ben Lujan at ben.lujan@nmlegis.gov

Capalbo, Rosanne
Page 1 of 1

PC_1519

Levens, Matthew

From: Rosanne Capalbo [ruzan16@homail.com]
Sent: Tuesday, February 19, 2008 5:51 PM
To: Complex2030
Subject: nuclear weapons

Rosanne Capalbo
627 Paris Street
San Francisco, CA 94112-3511

February 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I oppose any funding for government programs to make any nuclear weapons.

I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

2|1J How can we demand other countries such as Iran not build nuclear weapons if we are?

3|1K THe Bush administration has done a lot to destroy american relationships with the world community. THis is another example.

Fight this administration!!

Sincerely,

Rosanne Capalbo

Capozzelli, J
Page 1 of 1

PC_80

February 22, 2008

Mr. Theodore Wyka
Complex Transformation SPEIS Manager
Office of Transformation, NA-10.1
Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Wyka:

RE: Complex Transformation SPEIS Comments

1|16A I am writing because I deeply feel that "Complex Transformation" is a fundamentally flawed, misguided plan that overemphasizes recreating the capacity to research, develop, and manufacture new nuclear weapons.

2|3A The United States still maintains thousands ofnuclear weapons; it does not need to design new types or produce new warheads.

3|13A 1 The United States would be more secure if nuclear weapons are eliminated worldwide.

4|1J The United States should re-affirm our commitment to a world free of nuclear weapons and publicly pursue that goal. This will help U.S. efforts to prevent other nations from developing nuclear weapons.

3|13A.1 (cont.) Complex Transformation plans for producing new plutonium pits, the core of nuclear weapons, undermine these critical national security goals.

The DOE needs to abandon its Cold War mindset.

5|7F The United States can and will maintain a reliable nuclear arsenal for many years and does not need to build new nuclear weapons. The focus should be on shrinking the still-oversized nuclear weapons complex and on maintaining the safety and security of existing weapons as the size of our nuclear stockpile is reduced.

Thank you for your help in this urgent matter.

Respectfully,

J. Capozzelli
315 West 90th Street
New York, NY 10024

Carawan, Guy
Page 1 of 1

PC_85

February 25, 2008

Mr. Theodore A. Wyka
Office of Transformation
Department of Energy
1000 Independence Ave., NW
Washington, D.C. 20586

Dear Mr. Wyka:

1|14N We need to express our concerns about the planned expansion of the work on nuclear weapons in Oak Ridge, Tennessee. We are longtime residents of East Tennessee. Week after week in the local paper we read of accidents, problems, near misses, contamination of workers and the environment due to the nuclear facilities presently functioning in Oak Ridge.

2|7J If new funds are to be spent there, and if jobs are to be created, we want them to be used to clean up and safely contain the very dangerous nuclear waste and materials currently threatening this community.

3|1F Moreover, we are well aware that enough nuclear weapons already exist in our country to destroy the planet. The United States needs to lead the way and set an example in honoring the Nuclear Nonproliferation Treaty we have already signed.

4|9B; 2|7J (cont.) We fully expect the Department of Energy to listen to the concerns of its citizens. Resources need to be spent on safety and responsible clean up in Oak Ridge as well as contributing to the larger issues of building a more healthy society based on peace rather than the threat of war.

Sincerely,

Guy & Candie Carawan

Mr. & Mrs. Guy Carawan
1959 Highlander Way
New Market, TN 37820

Carle, Diane
Page 1 of 1

PC_447

Buenaflor, Justin

From: Diane Wyland Carle [ecopsyche@embarqmail.com]
Sent: Wednesday, February 20, 2008 1:19 AM
To: Complex2030
Subject: Deny funding for a new U.S. Nuclear Weapons Complex

Diane Wyland Carle
258 Two Crane Lane NW
Poulsbo, WA 98370-9700

February 20, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|14N I am a resident of Poulsbo, Washington living 7 miles from the Bangor Sub Base. It would not be possible for myself or family members to survive a nuclear accident or purposeful use of a nuclear bomb.

2|16A I urge you to deny funding for the Chemistry and Metallurgy Replacement Project.

3|1F Increasing spending on diplomacy, and negotiating for an increase in non-nuclear proliferation treaties is the sensible direction to take. An increase in "bomb-making" or nuclear weapons should be opposed strongly.

4|8E Congress rebuked the Energy Department's last attempts to upgrade the arsenal by defunding the Reliable Replacement Warhead and last year's proposed mega-scale bomb plant. The CMRR project is another irresponsible new program that Congress should reject.

Sincerely,

Diane Wyland Carle
360-779-1152

1

Carlo, Terry
Page 1 of 1

PC_1689

Levens, Matthew

From: tuxc@verizon.net
Sent: Saturday, April 05, 2008 7:06 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|16A NO NUKES!!

Thank you!

Sincerely,
Terry Carlo
23 Clinton Avenue
Pittsfield, MA 01201

cc:
Senator Edward Kennedy
Senator John Kerry
Representative John Olver

Carr, Hope
Page 1 of 1

PC_1758

Levens, Matthew

From: hopecarr@ix.netcom.com
Sent: Friday, April 04, 2008 8:45 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|16A It is my opinion that efforts to produce new nuclear weapons are misplaced. Instead, the DOE should focus on shrinking the our current stock, as well as maintaining the safety and security of our existing weapons.

2|1C A major review to be undertaken by the next president has already mandated by Congress.

Thank you for your consideration.

Sincerely,
Hope Carr
358 85th Street
BROOKLYN, NY 11209

cc:
Senator Charles Schumer
Representative Vito Fossella
Senator Hillary Clinton

Carr, Michael
Page 1 of 1

PC_1966

Buenaflor, Delight

From: Michael A. (Mike) Carr [carr18@llnl.gov]
Sent: Thursday, April 10, 2008 5:18 PM
To: DIV.Complex.Transformation
Subject: Form Post from Firefox

Last Name=Carr
First Name=Michael
Email Address=coyotecarr@aol.com
Street Address=4499 Muirwood Drive
City=Pleasanton
State=CA.
ZIP Code=94588-4370
Comments=DOE and LLNL presence is needed and vital for national security. I am concerned about the amount of work that will still be remaining at the LLNL site. I support a restructuring plan but not at the expense of a loss of work and jobs at LLNL. It appears that the cutbacks and draw downs are excessive.
1|10C; 2|18B
--
Michael A. (Mike) Carr
4499 Muirwood Drive
Pleasanton, CA. 94588-4370
Tel: 925-485-1707
CoyoteCarr@aol.com

1

Carroll, Bonnie
Page 1 of 2

PC_790

Levens, Matthew

From: Wyka, Ted
Sent: Monday, February 25, 2008 1:45 PM
To: Complex2030
Subject: Fw:

Attachments: NNSA SPEIS support letter.doc

NNSA SPEIS
port letter.doc

----- Original Message -----
From: Bonnie Carroll <bcarroll@iiaweb.com>
To: Wyka, Ted
Sent: Mon Feb 25 13:41:39 2008
Subject:

Mr. Wyka,

Attached is input to the NNSA consideration of SPEIS alternatives. I understand you are to be the recipient of these comments.

Thank you for the opportunity to comment.

Bonnie

Bonnie C. Carroll

President

Information International Associates

1055 Commerce Park Drive

P.O. Box 4219

Oak Ridge, TN 37830

865.298.1220 (office)

865.740.6596 (cell)

865.481.0390 (fax)

bcarroll@iiaweb.com (e-mail)

Visit us at www.iiaweb.com <https://iiamailserver.infointl.com/exchweb/bin/redir.asp?URL=http://www.iiaweb.com>

Bonnie

1

Carroll, Bonnie
Page 2 of 2

PC_790

February 25, 2008

Mr. Theodore Wyka
U.S. Department of Energy
National Nuclear Security Administration
Office of Transformation (NA-10.1)
1000 Independence Avenue, S.W.
Washington, DC 20585
Theodore.wuka@nnsa.doe.gov

Dear Mr. Wyka:

As President of Information International Associates, an information management small business headquartered in Oak Ridge, Tennessee, I am writing to express our company's position regarding the National Nuclear Security Administration's Complex Transformation SPEIS.

1|15A IIa strongly supports the second alternative to create Distributed Centers of Excellence where the mission of Y-12 will remain as the center of excellence for uranium. We believe that this alternative will best serve not only the NNSA and the United States government, but also the economy and citizens of Oak Ridge and East Tennessee, a community that has loyally supported the DOE/NNSA mission from its beginnings.

1|15A (cont) Y-12 has a strong history and tradition of excellence in service to the nation and to the region. We believe that having Y-12 maintain a uranium center of excellence is a necessary step in support of the nation's commitment to national security. Modernization of the facilities in Oak Ridge will not only facilitate the center of excellence, but also provide strong incentive for bringing complimentary work to the region.

IIa has been headquartered in Oak Ridge since its founding in 1988. As a government contracting company, we do significant business with the government facilities in Oak Ridge and therefore are greatly interested in the efficiency and effectiveness of our country's nuclear weapons program and especially the Y-12 National Security Complex. We recognize from a business standpoint that a modernized nuclear weapons complex is necessary for our national security. We see the Y-12 involvement as a critical continuation of our East Tennessee and Oak Ridge commitment to that mission.

For these reasons, IIa appreciates the opportunity to provide comment on this issue. Don't hesitate to contact me if I can be of any further assistance.

Sincerely,

Bonnie C. Carroll
President, Information International Associates

INFORMATION INTERNATIONAL ASSOCIATES, INC (IIA)
1055 COMMERCE PARK DRIVE, SUITE 110 • P.O. BOX 4219 • OAK RIDGE, TN 37831-4219
PH: 865.481.0388 • FX: 865.481.0390 • EMAIL: INQUIRY@IIAWEB.COM

Carroll-Ridella, Leela
Page 1 of 1

PC_597

Levens, Matthew

From: Leela Carroll-Ridella [leelacr@yahoo.com]
Sent: Thursday, February 21, 2008 12:25 PM
To: Complex2030
Subject: Comment on President's nuclear weapons program proposal

Leela Carroll-Ridella
2091 California St #132
Berkeley, CA 94703-1436

February 21, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A As a tax-paying voter, I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons. I am also opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal. These plans are are both illogical and unsound for our future.

2|1J As a person her late 20's who is starting a family of her own, I am very concerned about the future my children and grandchildren may face, if another Cold War - or worse - were to take place. Also, building this new plant would send a contradictory message to other countries, such as Iran, who may be seeking nuclear weapons. While the U.S. is asking others to forego developing nuclear arsenals, we are simultaneously trying to increase our own capacity to build new nuclear weapons.

3|8A Congress rebuked the Energy Department's last attempts to upgrade the arsenal by defunding the Reliable Replacement Warhead and last year's proposed mega-scale bomb plant. The CMRR project is another irresponsible new program that should be rejected.

Sincerely,

Leela Carroll-Ridella
4152406494

1

Carson, Carol
Page 1 of 4

PC 239

108 N. Auburndale St
Apt. 1022
Memphis, TN 38104
April 1, 2008

Theodore Wyka
Complex Transformation
SPEIS Document Mgr.
U.S. Dept. of Energy
1000 Independence Ave. S.W.
Washington DC 20585

Dear Mr. Wyka,

1|1F — The US commitment to the nonproliferation treaty requires disarmament - so the government should be working a plan for reducing the arsenal to zero rather than building more

Carson, Carol
Page 2 of 4

weapons of mass destruction and maintaining its stockpile.

1|1F (cont.) — The United States committed in 1970 to pursue complete nuclear disarmament "at an early date" in the non-proliferation treaty. Complex Transformation proposes to build more bombs as many as 200 a year. It is past time to keep our word.

2|1J — The NNSA proposal to maintain an enduring nuclear stockpile is extremely dangerous and will provoke nuclear proliferation. As long as we build bombs, other nations will build them.

3|3A — There is no technical or military need for Stockpile Life Extension.

Carson, Carol
Page 3 of 4

The United States is spending more than 40 billion a year maintaining its deployed nuclear stockpile; Money that is needed to meet social needs - education, health care, housing and more. The proposed "transformed" weapons complex will cost tens of billions of dollars.

4|9B

Our dream of a world free of nuclear weapons is possible. Believe!

A world free of nuclear weapons is possible if the United States leads the movement toward disarmament. Henry Kissinger, George Shultz and others believe it is time.

2|1J (cont.)

Carson, Carol
Page 4 of 4

This is the pivotal moment of the nuclear age.

Nuclear weapons holds us all as hostages!

Our nice guided home become the final bloody burial ground for all humanity.

We must place our trust in the Lord of Life rather than in "gods of metal" (Lev. 19:4)

5|16A

Christians must act as peace makers, "Beating swords into plowshares and spears into pruning hooks." (Isa 2:4)

Thank You and may God bless You as His servant.

Sincerely,

Carol Carson
408 N. Edgewood St.
Mpls. Fla. 38104

Carson, Keith
Page 1 of 2

PC_1049

EastBay EDA

East Bay Economic Development Alliance
The bright side of the San Francisco Bay

East Bay EDA Officers
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Alameda County Board of Supervisors
Michael K. Brown, Vice Chair
Morgan Miller Blair
David Cisco, 2nd Vice Chair
New United Motor Mfg., Inc. (NUMMI)
James Paluchi, Past Vice Chair
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Contra Costa County Board of Supervisors
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City of Union City
Joseph J. Harabedian
Oakland Metropolitan Chamber of Commerce
Wil Hardee
Pacific Gas & Electric Company
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City of Dublin
Layne Morgan
Shea Homes
Honorable Gayle McLaughlin
City of Richmond
Ken Mercer
ValleyCare Health System
Susan S. Muranishi
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California State University, East Bay
Honorable Larry Reid
City of Oakland
Honorable Tony Santos
City of San Leandro
Karen Scott
Sandia National Laboratories
Honorable Douglas Siden
East Bay Regional Park District
Carole Watson
United Way of the Bay Area

1221 Oak Street
Suite 555
Oakland CA 94612
www.eastbayeda.org
(510) 272.3874

March 19, 2008

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1 U.S. Department of Energy
NNSA 1000 Independence Avenue, SW
Washington, D.C. 20585

Dear Mr. Wyka,

The East Bay Economic Development Alliance wishes to express our appreciation for the many contributions Lawrence Livermore and Sandia National Laboratories have made to our region and to comment on the Bay Area's unique assets that can complement laboratory technology as DOE plans to transform our national weapons complex.

East Bay EDA's membership of over 600 public, private and community leaders in Alameda and Contra Costa Counties are aware of the important economic impact that both national laboratories have on our region. Laboratory technologies have been responsible for many significant improvements in the areas of health care, infrastructure maintenance, energy, public protection, emergency response, and our understanding of climate, not to mention advances in basic science. 1|15A

During 2007 the technology and capabilities of the national laboratories in Livermore and Berkeley played a major role in attracting $920 million in public and private sector funding for biofuels research to the East Bay. Thanks to the Department of Energy's funding for the Joint Bio-Energy Institute (JBEI) and the expertise at our national laboratories the East Bay has become a global leader in biofuels research.

The two independent decisions – DOE's public sector award of JBEI as the result of a national competition and BP's private sector award of the Energy Biosciences Institute as the result of an international competition – also highlight the fact that the Bay Area has something to offer in meeting national R&D priorities. For instance, the Bay Area is a leader in not just one, but a number of technologies. This breadth of expertise has enabled technology fusion across disciplines and industries leading to numerous breakthrough innovations.

Livermore, CA

Carson, Keith
Page 2 of 2

To be effective, much of the new technology in the areas of national security and energy independence require not only innovation but also rapid commercialization and deployment. The Bay Area has no peer in taking technology to market and the region's abundant laboratory, university and private sector technology, financial resources, entrepreneurship, industry networks and skilled workforce can be seen as national assets in their own right.

Therefore the East Bay EDA supports restructuring and modernizing Lawrence Livermore and Sandia National Laboratories as outlined in the Preferred Alternative. We also consider the East Bay to be the preferred location for attaining the objectives of the complex transformation. The proposed transformation of these East Bay laboratories represents a unique opportunity to build on the public/private collaboration occurring in the Bay Area and to advance research in areas key to our global competitiveness and national security.

The region has benefited from the work of these institutions and the contributions of its employees over the past 60 years and we look forward to working closely with these laboratories in the future to maximize the opportunities presented by DOE's complex transformation plan.

Sincerely,

Keith Carson
Chair

cc: Executive Committee

Caruso, Dorian

Page 1 of 1

PC_1739

Levens, Matthew

From: Dorian Caruso [fenix22@verizon.net]
Sent: Friday, March 28, 2008 8:06 PM
To: Complex2030
Subject: Please oppose all new nuclear weaponry.

Dorian Caruso
1655 Klockner Rd
Hamilton, NJ 08619-3130

March 28, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

I am a disabled female living in a busy city apt building & probably could not escape to safety. I know that such weapons kill & maim many innocent people & leave large areas polluted for a very long time. Further, I know that if we produce them, we will use them, & I am weary of wars. We MUST learn to grow up and settle our differences in a more adult manner instead of killing and maiming each other.

2|14M.3 We plan to build more arsenals even before we know how and where to safely store nuclear waste. Can you blame populations of different states for refusing to accept nuclear waste sites in their state? Who in their right mind wants the cancer-causing contamination nearby?

3|1J While we ask others to forego developing nuclear arsenals, we are simultaneously trying to increase our own capacity to build new nuclear weapons. Why are we surprised that other countries hate us when we project double standards?

1|16A (cont) The CMRR project is another irresponsible new program that should definitely be rejected. Congress rebuked the Energy Department's last attempts to upgrade the arsenal by defunding the Reliable Replacement Warhead and last year's proposed mega-scale bomb plant. Let's cefund these.

Sincerely,

Dorian Caruso
6095885353

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Cassell, Alisse

Page 1 of 1

PC_343

Ms. Alisse Cassell
4315 9th Ave NE, Apt. #304
Seattle, WA 98105

Mr. Ted Wyka, NNSA
Office of Transformation NA-10.1
1000 Independence Ave. S.W.
Washington, D.C. 20585

Dear Mr. Wyka,

1|7O I am opposed to the three options laid out in the Draft SPEIS and support the No Production Alternative presented by OREPA. I hope for a world of peace in which the
2|1F United States joins the majority of the world in dismantling our stockpile of nuclear weapons and begin to implement the directives of the Nuclear Non-Proliferation Treaty.
3|1J As an unarguably powerful country, our leadership and commitment to the treaty is essential to the furthering of world peace.

4|2C I would also like to suggest that, as nuclear development, waste, and proliferation affects everyone, the decision-making processes should also involve everyone – not just those in communities who have vested economic interests in it.

1|7O (cont.) I hope you will give the No Production Alternative the consideration it deserves. These decisions are too large for us, our children, and the rest of the world to not consider every viable alternative.

Sincerely,
Alisse Cassell

Caswell, Helen

Page 1 of 1

PC_1613

Levens, Matthew

From: helencaswell@aol.com
Sent: Saturday, April 05, 2008 1:29 PM
To: ComplexZ030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

Dear Sir,

1|16A You have a rare and priceless opportunity to guide the future of our nation and the world, by preventing the DOE from persuing its plans to upgrade our weapons complex.

2|1C Please allow the next president and the Department of Defense to make the critical decisions of how our current nuclear weapons should be used and maintained, and only then decide about upgrades.

3|1B It is critical that persons other than the DOE make the decision about whether to create a more weapons-laden country, and all that will mean to international relations.

I ask that you include my comment as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project.
Thank you.

Sincerely,
Helen Caswell
1610 Samuel Drive
Cottage Grove, OR 97424

cc:
Senator Ron Wyden
Representative Peter DeFazio
Senator Gordon Smith

Caufield, Ann

Page 1 of 1

March 27, 2008

PC_309

Attn: Theodore Wyka re Nuclear Weapons
Dear Mr Wyka:
About the "Complex Transformation" proposal to build and maintain nuclear weapons:

1|1L 1. Our own nation (of which you are a part) has been at loggerheads with North Korea and Iran over their proposals to build or enhance a nuclear weapon program. Have you not been informed about it? WHAT are you thinking of? Is the President aware of this - yet?

2|1J 2. We have been promoting nuclear disarmament and international non-proliferation efforts both at home and internationally.

3|16A 3. Please sit down with your advisors and consider the inconsistencies and false values of "Complex Transformation."

Thank you!

Ann C. Caufield
1737 Blossom Rd
Rochester, N.Y. 14610

cc Senator Charles Schumer
Senator Hillary Clinton
Rep. Louise Slaughter
President George W Bush

Cecchini, Rose
Page 1 of 2

PC_265

Office of Peace, Justice & Creation Stewardship
Under the auspices of Catholic Charities of Gallup Diocese
P. O. Box 3146
Gallup, New Mexico 87305
Tel (505) 722-5272

March 31, 2008

Mr. Theodore A. Wyka
Complex 2030 SEIS Document Manager
Office of Transformation
U.S. Department of Energy, NA-10.1
1000 Independence Avenue, S.W.
Washington D.C. 20585

Re: "Complex Transformation" - Four-fold increase in Los Alamos Laboratory's capacity to produce plutonium bomb cores "pits" for new nuclear weapons

Dear Mr. Wyka:

1|16A Catholic Christian people of Gallup Diocese, in New Mexico and Arizona, strongly oppose "Complex Transformation," which includes a four-fold increase in Los Alamos Laboratory's capacity to produce plutonium "pits" or cores for a new series of nuclear weapons.

2|1F The U.S. Catholic Bishops Conference has repeatedly urged U.S. government administrations to promote genuine nuclear disarmament and non-proliferation, not merely as ideals, but as moral imperatives and urgent policy goals. Our nation needs to move away from its reliance on nuclear weapons for false security and, instead, commit itself to international non-proliferation and the successful control of nuclear materials in this age of terrorism. A true commitment to peace also requires us to promote respect for human life and dignity, human rights, and genuine development in a world plagued by injustice and poverty.

Our opposition to "Complex Transformation" rests on the following moral, ethical principles:

- 3|1J These new nuclear weapons would erode the fragile barrier against nuclear use because they are part of a strategy that contemplates first use of nuclear weapons and their use against non-nuclear threats. Smaller, more "useable" nuclear weapons would not be discriminate or proportionate in any meaningful sense.
- The proliferation of weapons of mass destruction is a serious problem: research on new, "more useable" nuclear weapons will only undermine the credibility of U.S. efforts to address it. Mutual restraint, international cooperation, and leadership by example are called for, not the proliferation of our own weapons of mass destruction.
- 4|5C.1 The United States retains a nuclear arsenal that far exceeds anything necessary to deter existing or forseeable nuclear threats: one modest estimate being 23,000 nuclear warhead in stockpile. Studies show that existing cores do not deteriorate with age and may last for up to 100 years. The moral task today is to proceed with deeper cuts and ultimately to ban nuclear weapons entirely, not to begin research on new nuclear weapons.
- 5|1E Funding for research on new nuclear weapons and efforts to make it easier to rapidly resume nuclear testing would move the United States further from the urgent task of ratifying the Comprehensive Test Ban, an essential step in stopping nuclear proliferation and moving toward progressive nuclear disarmament.

Cecchini, Rose
Page 2 of 2

In addition to our moral, ethical and environmental justice principles for opposing "Complex Transformation," the House Armed Service Committee specifically stated that "there is an urgent need for a debate over the role of nuclear weapons in U.S. strategic posture."

6|1C This PEIS is based on Bush's 2001 Nuclear Posture Review. Congress has specifically required the incoming president to prepare a new Nuclear Posture Review saying it "should be used as a basis for establishing future United States arms control objectives and negotiating positions." The same law also requires a bipartisan commission to recommend by December 2008 the number of nuclear weapons actually needed and the related appropriate size and composition of the nuclear weapons complex.

It is groundless for this planned "Complex Transformation" to proceed before a new Nuclear Posture Review is prepared. NNSA's "Complex Transformation" PEIS should be withdrawn until the new administration has carried out an updated Nuclear Posture Review, which will undoubtedly change aspects of the "Complex Transformation" as it is currently written. It would also be a huge, irresponsible misuse of taxpayer money to begin to act on this "Complex Transformation" and then have the next administration decide to change it. With many urgent domestic financial needs facing people in the United States, such gross misuse and waste of taxpayers' money is morally unjustifiable.

7|9H

1|16A (cont.) Thank you for your serious consideration of our reasons for opposing "Complex Transformation." The continued possession, further development, and manufacture of nuclear weapons by the United States undermines the moral, ethical basis of our society, violates treaties our nation has signed, wastes our nation's wealth, and permanently contaminates the living systems of earth which sustain all life, while providing no real contribution to U.S. national security.

Peace blessings,

Rose Marie Cecchini, MM

Rose Marie Cecchini, MM
Coordinator

Cechovic, Winfried
Page 1 of 1

PC_1569

Levens, Matthew

From: Winfried Cechovic [paul.cechovic@verizon.net]
Sent: Tuesday, February 19, 2008 9:47 PM
To: Complex2030
Subject: Nuclear weapons

Winfried Cechovic
215 Kings Croft
Cherry Hill, NJ 08034-1116

February 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

Stop the nuclear weapons insanity. Build safe nuclear power plants instead.

Sincerely,

Winfried Cechovic
856-667-7034

1

Cechovic, Winfried
Page 1 of 1

PC_1262

Levens, Matthew

From: Winfried Cechovic [paul.cechovic@verizon.net]
Sent: Thursday, March 27, 2008 11:42 PM
To: Complex2030
Subject: nuclear weapons

Winfried Cechovic
215 Kings Croft
Cherry Hill, NJ 08034-1116

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

I am also opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal.

3|2O |Nuclear energy -- YES.

1|16A (cont.) |Nuclear arms -- NO!!!!!!!!!!!!!!!!!!!!1

Sincerely,

Winfried Cechovic
856-667-7034

1

Chacon, Virginia

Page 1 of 1

PC_618

Levens, Matthew

From: Marcia Bailey [wilmarc83@warmhearthva.org]
Sent: Wednesday, January 16, 2008 5:05 PM
To: Complex2030
Subject: Citizen Comment regarding SPEIS, Complex Transformation

Mr. Wyka:
The Department of Energy should be putting their resources into nuclear cleanup and "green" energy research, not expanding their weapons program. New warheads are not only unwanted, they are also unnecessary.

1|16A With so many unresolved issues around nuclear waste, storage, employee safety and compensation and popular will for reducing nuclear weapons it doesn't make sense for U.S. taxpayers to invest in a new generation of nuclear weapons facilities.

Please cease and desist from such plans.

Marcia Bailey
1153 Oakland Sq
Blacksburg, VA 24060

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Chadwick, John

Page 1 of 1

PC_1777

Levens, Matthew

From: Physicians for Social Responsibility [webmaster@psr.org] on behalf of John Chadwick [cosbelongmos@hotmail.com]
Sent: Sunday, April 06, 2008 1:03 AM
To: Complex2030
Subject: nuclear weapons : Morbid.Absurd.Disgusting

Apr 6, 2008

Mr. Theodore Wyka
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Wyka,

1|1B I must shake my head in disbelief...
WHAT DOES IT TAKE for 'decision makers' to understand how babaric-insane-stupid it is continue developing nuclear weaponry???

2|2O Human beings can dress up in their finest and go to listen to a Mozart composition performed by a world-renown orchestra, YET we are so UNCIVILIZED that we allow the capability to annihilate ourselves!!!
How morbid, absurd, and disgusting.
Please resign: Give civilization a chance.

Sincerely,

Mr. John Chadwick
4751 Birch Bay Lynden Rd Spc 282
Blaine, WA 98230-6802

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Chalmers, Lois

Page 1 of 1

PC_2042

Levens, Matthew

From: Lois Chalmers/IEER [lois@ieer.org]
Sent: Thursday, April 10, 2008 10:25 AM
To: Complex2030
Subject: Rumor true? Extension until Apri 30 for Comments to DOE/EIS-0236-S4?

1|20 Very sorry to bother you.

We heard a rumor that the comment period for DOE/EIS-0236-S4 has been extended to April 30.

Is that true? Or are the comments due today, April 10? Or another date?

Thanks, Lois

Ms. Lois Chalmers
Librarian
Institute for Energy and Environmental Research (IEER)
6935 Laurel Avenue, Suite 201
Takoma Park MD 20912 U.S.A.
Phone: 1-301-270-5500; Fax: 1-301-270-3029
e-mail: lois@ieer.org
website: http://www.ieer.org

Chamberlain, Karen

Page 1 of 1

PC_570

Buenaflor, Justin

From: Karen Chamberlain [kcwriting@sopris.net]
Sent: Wednesday, February 20, 2008 2:43 AM
To: Complex2030
Subject: DO NOT RESTART THE U.S. NUC:EAR WEAPONS PROGRAM

Karen Chamberlain
1894 Homestead Road
Glenwood Springs, CO 81601-9634

February 20, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|1J I wish to express my strongest possible opposition to the administration's proposal to build a production plant for plutonium pit triggers for nuclear weapons, thereby restarting this country's nuclear weapons program. Such a plan is the height of irresponsibility at best—many would call it insane. Its effects will include: 1/ implicitly challenging other nations, including Iran and North Korea, to develop and stockpile nuclear weapons; 2/ destabilizing the world, and especially the Middle East, ever further than it already is; 3/ promoting an unthinkable form of warfare that would have such widespread and lasting deadly effects as to render areas where it is used permanently uninhabitable at best, and at worst, to destroy the planet. 4/ spending funds that are desperately needed in other areas within our country; and 5/increasing our country's already-record national debt, burdening our children and their children.

2|9A; 3|9B

Our nation needs to be leading the way toward peace, NOT creating additional, unnecessary means to wage the deadliest form of war.

Please prevent this proposal from ever becoming reality,

Karen Chamberlain
not applicable

1

Chambers, Beth

Page 1 of 1

PC_818

Levens, Matthew

From: Beth Chambers [bhchambers@cox.net]
Sent: Thursday, March 27, 2008 4:22 PM
To: Complex2030
Subject: No to funding more nuclear weapons!

Beth Chambers
501 Newport Avenue
Williamsburg, VA 23185-4012

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A; 2|1K 3|9H I'm writing this letter to let you know that administration's proposal to build a plant to produce plutonium pits for nuclear weapons is a terrible idea. I am completely against nuclear weapons, and I think we need to be getting RID of these weapons, not spending our dwindling tax dollars producing new ones!

1|16A (cont.) I believe it is in out national interest to stop building more weapons, and start exporting goodwill and diplomacy, not death and destruction.

It sounds corny, but I think it is bad karma that our country really doesn't need at this point. Or as Jesus would say, you reap what you sow.

Sincerely,

Beth Chambers

1

Chambliss, Saxby

Page 1 of 1

PC_191

United States Senate
WASHINGTON, DC 20510

February 21, 2008

We appreciate the Department of Energy holding this public hearing. It is important for the members of this community to have the opportunity to hear firsthand about the Department's transformation plan for our nation's nuclear weapons complex.

1|15A First let us state that we support the Department of Energy's efforts to transition to a more efficient and secure nuclear weapons complex. The Department is rightly looking toward the future needs rather than practices of the past. While transition always brings about change, there is no question in our minds that the Savannah River Site will continue to be a critical piece of the DOE Complex.

2|10H We know that the Department of Energy cannot find better infrastructure, better expertise, or a more supportive community for a nuclear program than right here at the Savannah River Site. We look forward to continuing this relationship for many years to come.

Saxby Chambliss
United States Senate

Johnny Isakson
United States Senate

Chandler, Susan

Page 1 of 1

PC_1681

Levens, Matthew

From: studio8@infionline.net
Sent: Saturday, April 05, 2008 2:16 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|3A We don't need new nuclear weapons. Once any given nation possesses enough missiles to destroy the planet, it is reached full nuclear armament.

2|2O We need to move on to raising our standard of living to equal or exceed that of European nations.

3|1B Only a person steeped in ignorance would claim that America is number one in anything other than aggression. We are not shining the light of democracy anymore, we are instead basking in what's left of the glow of our forefathers' deeds.

I ask that you include my comment as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project.
Thank you.

Sincerely,
Susan Chandler
1060 S US Hwy 1 #99
Vero Beach, FL 32962

cc:
Representative Dave Weldon
Senator Bill Nelson
Senator Mel Martinez

Chaney, Lola

Page 1 of 1

PC_1143

Levens, Matthew

From: Lola Chaney [lchaney1@fuse.net]
Sent: Thursday, March 27, 2008 6:41 PM
To: Complex2030
Subject: Nuclear proliferation

Lola Chaney
6207 Watchcreek Way #204
Milford, OH 45150-5615

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|2J How can we as a country who opposes any country building nuclear arms begin building more nuclear arms ourselves!!!

2|16A Therefore Ioppose any more upgrading or rebuildiong of any facilities that could produce nuclear arms.

Sincerely,

Lola Chaney
513-575-0642

Chang, Maria

Page 1 of 1

PC_388

Levens, Matthew

From: bob chang [rcwchang@yahoo.com]
Sent: Sunday, March 02, 2008 9:26 AM
To: Complex2030
Subject: SPEIS comments

1|7N; 2| 13A.1 I attended SPEIS for Complex Transformation at North Augusta. I think the SPEIS is very well written and the preferred alternative is the best choice to transform NNSA Nuclear weapon complex program in a cost effective way and to still achieve the defined missions. The dismantled Nuclear Weapon argument by some in the meeting are off the mark because I believe the country needs to maintain nuclear weapons as the deterrent; because there is no known proven ways to eradicate all nuclear weapons from the planet of earth. If so, unilateral dismantling will only lead to disaster because knowledge to manufacture nuke weapons is either out there or able to be acquired with right resources; relying on moral persuasion or mutual coercion can't not stop those who with crooked minds owning nuke weapons. Without nuke deterrent, then, terrorist groups can ransom and hijack the free world.

Maria Chang
456 Timber Wolf Trail
Martinez
GA 30907

Be a better friend, newshound, and
know-it-all with Yahoo! Mobile. Try it now. http://mobile.yahoo.com/;
_ylt=Ahu06i62sR8HDtDypao8Wcj9tAcJ

Chanse, Catherine

Page 1 of 1

PC_1302

Levens, Matthew

From: cchanse@gmail.com
Sent: Tuesday, April 08, 2008 10:08 AM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Theodore Wyka, Complex Transformation SPEIS Manager Office of Transformation, NA-10.1 U.S. Department of Energy/NNSA Washington, DC 20585

Dear Mr. Wyka,

1|16A I am writing to oppose the "Complex Transformation" plan which would upgrade the entire U.S. nuclear weapons complex and recreate the infrastructure to research, develop and manufacture new nuclear weapons.

2|14J The Nevada Test Site is one of the plan's key locations and is located within the Treaty-recognized boundaries of the Western Shoshone Nation. This newest proposal would be in direct violation of a recent decision by the United Nations Committee on the Elimination of Racism, which stressed the urgency of the Western Shoshone situation and has urged the United States to stop actions, including those at the Nevada Test Site, against the Western Shoshone Nation.

3|1J Complex Transformation also undermines U.S. efforts to stop the spread of nuclear weapons around the world. It sends the wrong message to the world by instilling a false sense of confidence in the ability of these weapons to increase security.

Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE should focus on shrinking the still-oversized nuclear weapons complex and on maintaining the safety and security of our existing weapons arsenal as the size of our nuclear stockpile is reduced.

Sincerely,
Catherine Chanse
840 Hayes Street, #12
San Francisco, CA 94117

Chanse, Ursula

Page 1 of 1

PC_1249

Levens, Matthew

From: ursulachanse@hotmail.com
Sent: Monday, April 07, 2008 3:50 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Theodore Wyka, Complex Transformation SPEIS Manager Office of Transformation, NA-10.1 U.S. Department of Energy/NNSA Washington, DC 20585

Dear Mr. Wyka,

1|16A I am writing to oppose the "Complex Transformation" plan which would upgrade the entire U.S. nuclear weapons complex and recreate the infrastructure to research, develop and
2|14I manufacture new nuclear weapons. Furthermore, the Nevada Test Site, one of the plan's key locations, is located within the Treaty-recognized boundaries of the Western Shoshone
3|10B Nation.

3|10B (cont) This newest proposal is then in direct violation of a recent decision by the United Nations Committee on the Elimination of Racism, which stressed the urgency of the Western Shoshone situation and has urged the United States to stop actions, including those at the
2|14I (cont) Nevada Test Site, against the Western Shoshone Nation.

4|1J Complex Transformation also undermines U.S. efforts to stop the spread of nuclear weapons around the world. It sends the wrong message to the world by instilling a false sense of confidence in the ability of these weapons to increase security.

Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE should focus on shrinking the still-oversized nuclear weapons complex and on maintaining the safety and security of our existing weapons arsenal as the size of our nuclear stockpile is reduced.

Sincerely,
Ursula Chanse
577 Isham St. Apt. 3D
New York, NY 10034

Chase, Dawn

Page 1 of 2

PC_1958

Levens, Matthew

From: Dawn M. Chase [tcacmom@sbcglobal.net]
Sent: Thursday, April 10, 2008 10:09 AM
To: Complex2030
Subject: Complex Transformation Comments on Draft SPEIS

SPEIS Comments on Complex Transformation

Having attended the Complex Transformation Draft SPEIS Public Hearing in Tracy, I find myself perplexed by some of the proposed changes. My thoughts and comments are as follows:

1|13A.1 1. Consolidation of Cat I/II SNM at one site seems to say "Easy Target" for terrorists. Why are we putting all of our eggs in one basket? I understand the cost of doing business due to the ultra conservative security poster is expensive, but there is a price to pay for national security and it is something we cannot live without...literally!

2|16A 2. You propose to remove LLNL from many operations.
LLNL and LANL have historically provided excellent research in part due to the competitive nature of the scientists. Different scientists have different ideas and competition makes for a better product. By putting all of the eggs in one basket, you have now reduced the competition and multiple ideas that currently provide for amazing scientific advances.

3|6D; 4|6D.1 3. Hydrodynamic Testing is a critical factor in national security. LLNL, Site 300, has a state of the art facility (CFF) with a highly qualified staff to operate the facility. Taxpayers spent millions of dollars to have the capability to protect our nation.
You propose to close CFF in 2015, yet we do not have this capability anywhere else in the world. I understand you plan to move the capability to DARHT, but DARHT is outdoors and has not functioned in the dual mode yet. In addition, LANL personnel do not have the level of expertise as LLNL personnel. LANL is coming to LLNL's CFF personnel for assistance/guidance. What happens when there is no LLNL personnel with the expertise because CFF has been shut down? What is the advantage of taking indoor testing in a remote location to an outdoor location?
Your proposal also indicates that there is a plan for a DARHT replacement at NTS in 2025 timeframe. Doing the basic math, there is AT LEAST a 10 year gap between CFF and the DARHT replacement. Is the DARHT replacement at NTS to be indoor testing like CFF? If so, should we not continue testing at CFF where we already have the expensive facility with the highly qualified staff? Why move it for 10 years to an outdoor facility where more contaminants are put into the environment? Why rebuild something that is clearly not broken? Why am I, as a taxpayer, paying to replace a facility that is highly functional and necessary to our national security?

5|18A 4. The plan states that the goal is to “Reduce nuclear weapons personnel by 20-30% by natural attrition and transfer of personnel to other positions....” LANL and LLNL have already been hit very hard with layoffs despite being told during the contract transitions that natural attrition would be the method for reducing the workforce. It appears that more assumptions are being made with no guarantees to back it. In fact, by saying that reductions are expected through natural attrition, you have actually left the door wide open for more layoffs. Unfortunately, the layoff policies have the ability to displace a large number of highly qualified experts in weapons and weapons research. How do you plan to protect our country when we don't have the expertise and science and to support the mission? Everything seems to be about saving money, but you have lost sight of protecting our nation.

6|5N In summary, I am very concerned about our nations ability to maintain the best stockpile in a safe manner. Placing all of our SNM in one facility just seems like we are asking for trouble. And since we are announcing it to the world where it will all be, that doubles my concern. I am also very concerned that the proposal plans to take away the ONE indoor hydro test facility that exists. If you must consolidate, it seems that Site 300, which is remotely located, would be the optimum facility. I live on the south end of Tracy and know many others who live on the south end, and I have not met any who has been impacted by Site 300 operations. The expertise the U.S. will lose by shutting down CFF is beyond my comprehension. And moving hydro testing outdoors again is moving this country backwards. I

1

Chase, Dawn
Page 2 of 2

PC_1958

3|6D (cont) also understand that the "Dual" part of the DARHT is not yet functional and even if it becomes functional, it does not mean it is any better than what currently exists at CFF so I don't see any added benefit. In fact, I wonder why we wasted money building another hydro test facility unless it is to provide the competitive edge that is being removed by this proposal. Please explain the logic behind all of this.

Dawn Chase
27181 Fairoaks Rd.
Tracy, CA 95304
209-833-9141
tcacmom@sbcglobal.net

2

Chase, Jamie
Page 1 of 2

PC_1082

Levens, Matthew

From: j.chase2754 [j.chase2754@comcast.net]
Sent: Monday, April 07, 2008 11:32 PM
To: Complex2030
Subject: Citizen comment regarding the SPEIS
Attachments: speis comment.pdf; TOO MUCH2.jpg

5/15/2008

Chase, Jamie
Page 2 of 2

PC_1082

Mr. Theodore Wyka
Document Manager
Complex Transformation SPEIS
NNSA
complextransformation@nnsa.doe.gov

Dear Mr. Wyka,

I learned many things from the recent Santa Fe public hearing regarding the Complex Transformation SPEIS.

1. Power point presentations are maps codified to the benefit of the mapmakers and should not be mistaken for reality; remember Colin Powell at the UN?
2. Every single supporter of the SPEIS was financially connected to the labs, and argued their views in economic terms. While Los Alamos ranks among the wealthiest communities in the U.S., the State of New Mexico has ranked among the 10 poorest states for decades. 1|10R
3. Thousands of nuclear weapons have beendismantled. While this is good news, it reminds one of the millions of dollas wasted to manufacture them in the first place, and the millions more it cost o eliminate them. The whole process appears like a revolving door of money being poorly invested just to sustain Cold War pork projects.
4. There is no strategic value in pursuing a new nuclear weapons inventory and it sends yet another message to the world that America is willing to operate outside international frameworks. Our interests would be better served strengthening existing treaties, and cooperatively moving to secure if not eliminate existing stockpiles. 2|1J
5. On September 11, our multi-billion dollar nuclear weapons complex did nothing to stop 19 terrorists with box cutters from turning airplanes into weapons of mass destruction. America's short and long term security depends more on investment in new energy infrastructure, but will compound its insecurities by pursuing a new generation of nuclear weapons.

Thank you for listening.

Jamie Chase
Santa Fe, New Mexico

Chaudry, Anna
Page 1 of 1

Page 1 of 1

PC_2130

Levens, Matthew

From: The Chaudry's . [thechaudryfamily@gmail.com]
Sent: Thursday, April 10, 2008 5:38 PM
To: Complex2030
Subject: To Theodore Wyka

To Theodore,

1|16A I am against more production of nuclear weapons. Ilease reconsider adding more nuclear plants, we can't clean up the waste from past facilities.

Thank you
Anna Chaudry

Chavarria, J. Michael
Page 1 of 37

PC_258

SANTA CLARA INDIAN PUEBLO

POST OFFICE BOX 580
(505) 753-7326
(505) 753-7330

ESPANOLA, NEW MEXICO
87532

OFFICE OF GOVERNOR

February 29, 2008

Theodore A. Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
US Department of Energy/NNSA
1000 Independence Avenue SW
Washington, DC 20585

Re: **Request for 90-Day Extension of Time within which to provide Comments to the Department of Energy (DOE) regarding the draft Complex Transformation Supplemental Programmatic Environmental Impact Statement (draft Complex Transformation SPEIS)(DOE/EIS-0236-S4)**

Dear Mr. Wyka:

1|2E1 On behalf of Santa Clara Pueblo, I write to respectfully request a 90-day extension of time until July 15, 2008 within which the Pueblo may comment upon the above-referenced draft Complex Transformation SPEIS. There are a number of reasons for this request.

This document was issued at the traditional time of elections and installation of new leaders at Santa Clara Pueblo so this was not a matter easily addressed right away. While we appreciate DOE agreeing to conduct a meeting at Santa Clara Pueblo to inform our Pueblo members of the contents of this lengthy document, that meeting will not occur until the middle of March. Shortly thereafter is an extended time of cultural activities at the Pueblo in part associated with Holy Week leaving us only a week or two thereafter before the current deadline for comments on the document. That is simply not enough time for us to facilitate input from our community members and necessary briefings of the Tribal Council.

Since DOE, through the Complex Transformation SPEIS, is seeking to transform the entire nuclear weapons complex in ways that appear to significantly affect operations at Los Alamos National Laboratory for the rest of this century (if not beyond), it is critical that this process not

Chavarria, J. Michael
Page 2 of 37

be rushed. It is also critical that Santa Clara Pueblo's concerns be included and addressed through this process. The Pajarito Plateau, in which the Los Alamos National Laboratory is located, is part of Santa Clara Pueblo's ancestral homeland and cultural practices by Pueblo members in these areas impacted by the lab's operations continue, and will always continue, in these areas. The DOE has certainly recognized the importance of its government-to-government relationship with Santa Clara Pueblo through the *Restatement of Accord between the Pueblo of Santa Clara, a Federally-Recognized Indian Tribe and the United States Department of Energy* (October 31, 2006). We therefore ask that you honor this relationship by allowing us the proper amount of time to review and analyze the draft Complex Transformation SPEIS so that we may participate in this important process in a more constructive and meaningful manner.

Thank you for your consideration of this request. Please let me know as soon as possible your response to this request.

Sincerely,

J. Michael Chavarria
Governor

cc: Hon. Samuel W. Bodman
Hon. Pete V. Domenici
Hon. Jeff Bingaman
Hon. Tom Udall
Hon. Heather Wilson
Hon. Steve Pearce
Honorable Santa Clara Pueblo Tribal Council
Donald Winchell
Donald Ami
Kristen Ellis
Joseph Chavarria
Jessica Aberly

Chavarria, J. Michael
Page 3 of 37

PC_258

SANTA CLARA INDIAN PUEBLO

POST OFFICE BOX 580
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ESPANOLA, NEW MEXICO
87532

OFFICE OF GOVERNOR

April 1, 2008

Theodore A. Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
US Department of Energy/NNSA
1000 Independence Avenue SW
Washington, DC 20585

Re: **Confirming Extension of Time until June 12, 2008 within which Santa Clara Pueblo may provide Comments to the Department of Energy (DOE) regarding the draft Complex Transformation Supplemental Programmatic Environmental Impact Statement (draft Complex Transformation SPEIS)(DOE/EIS-0236-S4)**

Dear Mr. Wyka:

On February 29, 2008, I sent you a letter on behalf of Santa Clara Pueblo respectfully requesting a 90-day extension of time until July 15, 2008 within which the Pueblo would comment upon the above-referenced draft Complex Transformation SPEIS. On March 12, 2008, we discussed Santa Clara Pueblo's request during our meeting at the Pueblo prior to your briefing for Pueblo community members regarding the Complex Transformation SPEIS. I appreciate you taking the time to meet directly with me.

1|2E1
(cont)

At our March 12th meeting, and later that day during the community briefing, you committed to accepting comments from Santa Clara Pueblo regarding the Complex Transformation SPEIS, and considering those comments timely for purposes of inclusion in the administrative record for this NEPA process, if the comments were submitted no later than June 12, 2008. You indicated, however, that you would prefer receiving comments as soon as possible, even if it meant submitting a brief list or outline or having a meeting with you followed by a submission of more detailed comments before the June 12th deadline. As you may recall, I indicated that we would try our best to give you an outline or list in advance of the more detailed comments but that it was dependent upon Tribal Council approval and I could not make that commitment to you myself since the Tribal Council is the governing body. The whole point of our seeking an

Chavarria, J. Michael
Page 4 of 37

1|2E1
(cont)

extension in the first place was to ensure a proper amount of time to analyze and review with the Tribal Council the draft Complex Transformation SPEIS so that Santa Clara Pueblo could participate in this process, in accordance with our government-to-government relationship with the Department of Energy, in a constructive and meaningful manner. I appreciate your being sensitive to the fact that additional time is necessary for Santa Clara Pueblo because the document was released during a time of traditional and cultural activities and the public meetings and hearings did not occur until right before Holy Week, another time of intense cultural activities for the Pueblo.

1|2E1
(cont)

During our March 12th meeting, you indicated that you would send me a letter confirming the extension of time referenced above. I have not yet received that letter from you, however, and I am concerned because the original deadline for comments on the Complex Transformation SPEIS is fast approaching. Therefore, I ask that you please send me a letter as soon as possible confirming in writing your verbal commitment made to me during our March 12th meeting — that Santa Clara Pueblo's comments will be considered timely if submitted no later than June 12, 2008. In return, I can assure we will do all we can to try to get the comments to you as quickly as we can, given our own government processes and clearances.

Thank you for your assistance.

Sincerely,

J. Michael Chavarria
Governor

cc: Steven J. Morello, Director, DOE Office of Indian Energy Policy & Programs
Donald Winchell
Donald Ami
Members of the Santa Clara Pueblo Tribal Council
Joseph Chavarria
Jessica Aberly

Chavarria, J. Michael
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05/27/2008 08:46 FAX 2025867754
05/21/2008 11:03 FAX
003/035
002

SANTA CLARA INDIAN PUEBLO

POST OFFICE BOX 580
(505) 753-7326
(505) 753-7330

ESPANOLA, NEW MEXICO
87532

OFFICE OF GOVERNOR

RESOLUTION NO. 08 - 16

SUPPORTING THE SUBMISSION OF COMMENTS FOR SANTA CLARA PUEBLO TO THE DEPARTMENT OF ENERGY REGARDING THE COMPLEX TRANSFORMATION DRAFT SUPPLEMENTAL PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

WHEREAS, Santa Clara Pueblo (the "Pueblo") is a sovereign Indian tribe, recognized as such by the United States Government, with the Pueblo's Tribal Council as its governing body, whose authority is defined by the Pueblo's Constitution and Bylaws approved on December 20, 1935; and,

WHEREAS, the Pueblo has maintained a recognized and formalized government-to-government relationship with the Department of Energy (the "DOE") as set forth first in 1992 and then 2006 in the *Restatement of Accord between the Pueblo of Santa Clara, a Federally-Recognized Indian Tribe and the United States Department of Energy* (October 31, 2006); and,

WHEREAS, the DOE has issued a draft Supplemental Programmatic Environmental Impact Statement (the "Draft SPEIS") regarding the DOE's proposed transformation of the entire nuclear weapons complex ("Complex Transformation"); and

WHEREAS, the DOE's preferred alternative in the Complex Transformation Draft SPEIS includes significantly increasing and making permanent the production of plutonium pits at Los Alamos National Laboratory ("LANL"); and,

WHEREAS, the Tribal Council has concerns about the health impacts to the Santa Clara Pueblo community resulting from multiple past exposures from LANL, the increased risks of seismic events at LANL, and how the DOE's proposal will cumulatively impact the soils, air, water, and cultural resources of the Pueblo; and,

WHEREAS, the Tribal Council opposes expanding plutonium pit production at LANL and making that production capacity permanent through this Complex

Chavarria, J. Michael
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003

Transformation process when the impacts on the environment from sixty years of contamination at LANL still have not been adequately addressed; and,

WHEREAS, the Tribal Council believes it is important for the Pueblo, as a sovereign nation and as a matter of environmental justice, to protect the health and welfare and cultural survival of the Pueblo, by voicing concerns through participation in this and associated government-to-government processes regarding LANL to try to the greatest extent possible to alleviate impacts to the natural and cultural resources of the Pueblo.

NOW THEREFORE BE IT RESOLVED that the Tribal Council hereby authorizes and supports the submission by Governor Chavarria to the DOE of the attached comments regarding the Complex Transformation Draft SPEIS.

CERTIFICATION

I, the undersigned, duly elected Governor of the Santa Clara Pueblo, do hereby certify that the Tribal Council, at a duly called meeting that was convened with proper notice and was held on the 20th day of May, 2008, at Santa Clara Pueblo, New Mexico, a quorum being present, approved the foregoing Resolution with 10 in favor, and 0 opposed, 0 abstaining, 2 being absent.

J. Michael Chavarria
Governor J. Michael Chavarria

ATTEST:

Secretary

Chavarria, J. Michael
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05/21/2008 11:03 FAX 004

SANTA CLARA INDIAN PUEBLO

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ESPANOLA, NEW MEXICO
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OFFICE OF GOVERNOR

May 13, 2008

Theodore A. Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
US Department of Energy/NNSA
1000 Independence Avenue SW
Washington, DC 20585

Re: **Santa Clara Pueblo's Comments on the Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement (DOE/EIS-0236-S4)**

Dear Mr. Wyka:

Santa Clara Pueblo submits the following comments on the draft Complex Transformation Supplemental Programmatic Environmental Impact Statement ("SPEIS" in general or "Draft SPEIS" when referencing the draft document).

Based upon our face-to-face meeting on March 12, 2008, my letter dated April 1, 2008 confirming that discussion, your subsequent letter to me dated April 2, 2008, my subsequent correspondence with you, and our direct follow-up discussions including our telephone conference of April 7, 2008, I trust these comments will be considered timely and fully incorporated into the record.

Although the Draft SPEIS states that the agency proposing the action discussed therein is the National Nuclear Safety Administration ("NNSA"), because that agency is part of the U.S. Department of Energy ("DOE"), with which Santa Clara Pueblo enjoys a formal government-to-government relationship, the comments here reference DOE, instead of its agencies, as the institution proposing the actions in the Draft SPEIS. These comments, of course, apply in full force to the NNSA as an agency of the DOE.

Santa Clara Pueblo appreciates the enormity of the task at hand for the DOE. Transformation of the entire nuclear weapons complex incorporates many different facets and the Draft SPEIS addresses many different tasks as part of its proposed action. Santa Clara community members care about protecting our country and we do not necessarily object to the general idea of

Chavarria, J. Michael
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05/21/2008 11:03 FAX 005

2|14J1

consolidation of the nuclear weapons complex across the country or the goals of trying to make the nuclear weapons complex safer and less costly to maintain. The Pueblo, however, has extreme concerns about the increase in plutonium production at LANL contemplated in the SPEIS and we do not believe any increase is warranted at this time. We object to DOE making plutonium pit production permanent at LANL and to DOE increasing any pit production at LANL above the currently authorized level of 20. The Pueblo is also shocked at the DOE's paltry environmental justice analysis and the manner in which the SPEIS underestimates the impacts of its proposed actions on the Pueblo, including multiple exposures and cumulative impacts, in contravention of the National Environmental Policy Act ("NEPA").

3|5C1

4|2C.4;
5|14H.1

In addition, Santa Clara Pueblo is insulted that the DOE never conducted government-to-government consultation with the Pueblo as we requested regarding our concerns with the analysis in the DOE's 2006 draft site-wide environmental impact statement ("SWEIS") for the next five years of operations at Los Alamos National Laboratory ("LANL"). The Los Alamos Site Office has met with us on broader programmatic concerns raised in our comments but had to be clear that the SWEIS concerns were separate and were being handled at DOE headquarters in D.C. We are told that the final LANL SWEIS has just been issued but it will take some time for us to review yet another voluminous document. Consequently, our references here still look to the draft SWEIS. The fact that Santa Clara Pueblo's request for consultation prior to the finalization of the LANL SWEIS was disregarded by DOE shows enormous disrespect for our government-to-government relationship as formalized in the *U.S. Department of Energy American Indian & Alaska Native Tribal Government Policy*, DOE Order 1230.2 as revised on October 31, 2000 and reaffirmed by Secretary Bodman on January 20, 2006 ("DOE Indian Policy") and more specifically through the *Restatement of Accord between the Santa Clara Pueblo, a Federally Recognized Tribe, and the United States Department of Energy* (October 31, 2006) ("2006 Accord"). The DOE appears to have forgotten that the unique legal status of American Indian Tribes create an important requirement for the DOE, as the federal trustee, to consult directly with Tribal governments when contemplating actions that may affect Tribal members or their welfare, or Tribal land and resources.

Our concerns go beyond DOE's disrespect, however, and actually relate to the analysis in the Draft SPEIS. The DOE, through the draft LANL SWEIS, failed to comply with NEPA mandates and environmental justice requirements. It appears at times that the DOE is importing much of that same faulty analysis into this Complex Transformation SPEIS while at other times not even doing as much as was done in the incomplete LANL SWEIS analysis.[1] The consequences of the

6|5F

[1] For example, in the Draft SPEIS' discussion of the so-called Capability-Based Alternative, the DOE explains that the 2006 draft LANL SWEIS assessed the alternative of interim plutonium pit production at 50 pits annually and states that "[m]anufacturing pits in TA-55 at this level would likely cause only minor differences in impacts on land use, visual resources, water resources, geology and soils, air quality, noise, ecological resources, public health, cultural resources, and infrastructure." Based on this, the DOE concludes there is no need to even

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DOE's actions now of course, are much more serious for Complex Transformation since the SWEIS process only governs the next five years of LANL operations but this Complex Transformation SPEIS process sets in motion decisions for at least the next 65 years of LANL operations.[2]

7|5B

Worse yet, what was deemed in the 2006 draft LANL SWEIS to be "expanded operations" in terms of plutonium pit production at LANL is now referred to as the low end of what is needed for LANL pit production in the Complex Transformation Draft SPEIS.[3] To continue to expand further plutonium pit production at LANL and to make that production capacity permanent at LANL through this Complex Transformation NEPA process is irresponsible when past impacts on the environment from LANL operations, and even the next five years of impacts on the environment from proposed LANL operations, have not yet been addressed in any meaningful way.

This is no theoretical or sterile regulatory matter for Santa Clara Pueblo. The Pajarito Plateau, where LANL is situated, contains many areas of traditional importance to the Santa Clara Tribal community. Environmental degradation of, or improper clean-up of, this place that is profoundly holy to the Santa Clara community affects the cultural survival of Santa Clara Pueblo. What may seem to others only like barren or unused land near LANL is actually our Bethlehem, our Mecca, our Jerusalem. Imagine how you would react to hearing about a government proposal to make permanent the increased production of plutonium triggers for nuclear weapons, with all its related radioactive and hazardous waste generation, in your most holy place of worship. As you review these comments, please bear in mind that, prior to the Manhattan Project, the Pajarito Plateau was pristine and Santa Clara's connection to this area goes back to the beginning of time.

Because Santa Clara Pueblo is barely even mentioned in the Draft SPEIS, these comments begin

6|5F (cont.)

discuss these impacts related to 50 pits per year in this Draft SPEIS. *See* Draft SPEIS at S-3. This completely disregards the Pueblo's 22-page comment letter on the SWEIS (which we ask be incorporated into this record) regarding the far-from-minor impacts on Santa Clara Pueblo from the DOE's proposal in the SWEIS for LANL operations, including the preferred alternative to expand pit production to 50 certifiable pits per year. Another example in which the Draft SPEIS does not even acknowledge as much as the incomplete analysis in the draft LANL SWEIS can be found in our comments regarding cumulative impacts in section IV herein.

[2] LANL is the preferred site for a new Consolidated Plutonium Center or CPC. The Draft SPEIS states that a CPC would be operational by approximately 2022 and would have a "service life of at least 50 years." Draft SPEIS at S-28. Thus, Complex Transformation could affect at least the next 65 years of operations at LANL.

[3] As discussed in section III, there are significant new circumstances and information that affects the proposed plutonium pit production decisions for the LANL SWEIS. Consequently, a supplemental LANL SWEIS is warranted.

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with a brief background description of Santa Clara Pueblo. That is followed by a listing of our various concerns with the Draft SPEIS, including the failure to comply with various laws, policies, and executive orders, resulting in an underestimation of impacts to Santa Clara Pueblo, in contravention of environmental justice guidance and NEPA mandates. We conclude with a summary of next steps that must be taken in order to comply with the law.

I. Overview regarding Santa Clara Pueblo

8|10B

Santa Clara Pueblo is a federally-recognized Indian tribe located in northern New Mexico, approximately 25 miles northwest of the City of Santa Fe. Much of the City of Española, approximately one mile to the west of our Tribal government offices, actually is located within the exterior boundaries of Santa Clara lands. Since most of the maps of LANL in the Draft SPEIS fail to even include Santa Clara Pueblo, two maps indicating our location relative to LANL are attached to our comments. While our Tribal offices are approximately 18 miles away from LANL, our closest border is only about 5 miles from LANL. Our traditional lands include lands taken for the Manhattan Project.

While we always will emphasize the need for DOE to respect its government-to-government relationship with the Pueblo, Santa Clara Pueblo is not only a government in some bureaucratic sense of the word. In the broader cultural sense, we are also an Indian community of people, a society unto ourselves numbering less than a few thousand, distinct from every other Indian community in our traditions. We have similarities with the other Pueblos in New Mexico, especially those who also speak our Tewa language, but we are a separate sovereign Indian nation, recognized as such over the past 400 years by three different sovereign governments – Spain, Mexico, and the United States of America. Tribal leaders at Santa Clara Pueblo still carry the canes presented to our ancestral leaders by the Spanish and Mexican governments, as well as a similar cane presented by President Abraham Lincoln after New Mexico was annexed by the United States. Tribal protection and management of our natural resources along our ancestral homelands in the Jemez Mountains, Pajarito Plateau, and Rio Grande Valley began many thousands of years ago, long before the Spanish, Mexican, or American periods of our history.

The modern-day boundaries of our Pueblo include over 53,000 acres of land. This acreage figure includes some of our traditional lands that we have fought to regain but does not encompass all of our aboriginal territory. Many of the various vegetative communities and the innumerable wildlife species they support have significant traditional and spiritual value to us as a people. The Pajarito Plateau contains many areas of cultural importance to our people and our cultural practices connected to these areas continue to this day. Some of these practices will be highlighted in our comments as we discuss impacts from proposed activities in the Draft SPEIS

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to the air, soils, and water upon which we and the plants and animals depend.

It is not an acceptable solution to us that we, as a Tribal community and a land-based society, be asked to make sacrifices in where or how we practice our traditions in order to preserve our health from the risks posed by actions of the federal government. Because Santa Clara Pueblo is a distinct society and we are very few in number compared to the general population, and because our interaction with the natural world is considerably greater than the general population, LANL operations can profoundly affect our way of life. It is for this reason that we raise our concerns with the Draft SPEIS and that we insist that impacts be properly addressed.

II. There are inconsistent statements in the Draft SPEIS regarding the No Action alternative and regarding the 2006 LANL SWEIS which stymy public understanding

The Council on Environmental Quality ("CEQ") has issued regulations and other guidance materials interpreting NEPA. CEQ regulations state that NEPA "is our basic national charter for protection of the environment." 40 C.F.R. §1500.1(a). These regulations also mandate that federal agencies shall, to the fullest extent possible, ensure that environmental impact statements are clear and understandable in order to facilitate public involvement. *See, e.g., id.* at §1500.2 (b). Unfortunately, the Draft SPEIS contain a number of contradictory statements that only serve to confuse the public. 9|4A2

First, there are contradictory statements regarding what the No Action alternative really is. In one part of the document, the Draft SPEIS indicates that the Record of Decision for the 1999 LANL SWEIS, in which plutonium pit production capability at LANL of up to 20 pits per year was sanctioned, represents the No Action alternative. Draft SPEIS at 1-13 and 1-14. However, in other portions of the document, 50 pits per year is used as the No Action alternative. *See, e.g., id.* at 5-88 and 5-386.

The document also contains a number of contradictory statements about the 2006 LANL SWEIS which appear to assume an outcome for that process that had not yet been determined when the Draft SPEIS was issued and allegedly will not be determined until after this Complex Transformation NEPA process is complete. In numerous places, the document states that, through the 2006 LANL SWEIS, the DOE is evaluating increasing its current capacity to produce up to 20 pits per year at LANL. *See, e.g., id.* at 1-24 and D-10. This is an accurate statement based on the date of issuance of the Draft SPEIS and based upon the DOE's public assertions regarding the process it intends to follow. However, the document also states numerous times that LANL is "*presently reestablishing* an interim pit fabrication capacity that could provide up to 50 pits annually." *See id.* at 5-31 (emphasis added); *see also id.* at 5-64, 5-73, and 5-97.

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Besides being factually inaccurate and serving to confuse the public as to what has actually happened and what is being proposed, this repeated statement appears to pre-determine the outcome of the not-yet completed LANL SWEIS process, especially with respect to plutonium production decisions that are supposed to be made through the Complex Transformation process instead. *See id.* at S-10 ("NNSA will not make any new decisions specifically related to pit production at LANL prior to the completion of this SPEIS."). Throughout the document, it appears that DOE already considers 50 pits to be the minimum capability in contravention of the NEPA process still underway. *See, e.g. id.* at 5-97 (discussing plutonium phase out environmental effects, assuming LANL production of 50 certifiable pits annually prior to phase out). The most current Record of Decision on the books for plutonium pit production levels is from the 1999 SWEIS, with an authorized 20 pits per year. 9|4A2 (cont)

NEPA regulations require that agencies prepare a draft environmental impact statement with the same thoroughness as needed for final impact statements. When a draft statement precludes meaningful analysis, NEPA mandates that a revised draft of the appropriate portion of the environmental impact statement be prepared and circulated. 40 C.F.R. §1502.9(a). The 2006 Accord requires that DOE consult with the Pueblo "to assure that tribal rights, responsibilities, and concerns are addressed *prior* to the DOE taking actions." 2006 Accord at 3 (emphasis added). In order to remedy the problems discussed above, at a minimum, the DOE must conduct government-to-government consultation with Santa Clara Pueblo on proposed revisions to the draft to fix these defects, prepare a revised draft SPEIS, and then allow the public (including Santa Clara Pueblo) the opportunity to review and comment on the revised draft document. 10|2A

III. The "purpose and need" statement in the Draft SPEIS is not reasonably defined in light of new mandates from the President and the Congress, thereby violating NEPA 11|3A

An important requirement in any environmental impact statement is that the agency "briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action." 40 C.F.R. §1502.13. This requirement is closely related to the duty to discuss alternatives, because the purpose of an action determines the universe of alternatives an agency must consider. *Id.* Courts will defer to agency expertise but agency discretion is not unlimited. The agency still must exercise its discretion in a manner which is reasonable, especially taking into account the facts of the situation and the important goals of informed decision-making and protection of the environment found in NEPA. 11|3A (cont)

The purpose and need statement in the Draft SPEIS assumes outdated requirements regarding a need for increased plutonium production capacity. This assumption is not reasonable in light of new mandates from the President and the Congress, as well as based upon the DOE's own admissions in the document, and skews the entire NEPA analysis inappropriately. This faulty

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imbedded foundational assumption takes some digging to uncover, which is, in and of itself, a violation of NEPA and environmental justice mandates,[4] but is there nonetheless and infects the entire document.

(A) *Increased plutonium pit production is an imbedded assumption of purpose and need*

The proposed action in the Draft SPEIS is to "restructure the nuclear weapons complex to make it smaller and more responsive, efficient and secure, while meeting national security requirements." Draft SPEIS at 2-14. The proposed action is divided into two parts: restructuring special nuclear material ("SNM") facilities and restructuring research and development and testing facilities. The document states that the "underlying purpose and need" addressed in the Draft SPEIS are to:

- Maintain core competencies in nuclear weapons;
- Maintain a safe and reliable nuclear weapons stockpile; and
- Create a responsive nuclear weapons infrastructure that is cost-effective, and has adequate capacity to meet reasonably foreseeable national security requirements; and consolidate Category I/II SNM at fewer sites and locations within sites to reduce the risk and safeguard costs.

Id. at 2-1.

"Responsiveness" or having a nuclear weapons complex that is more "responsive" are terms that are used throughout the document not only to describe the proposed action but also to describe the purpose and need for the action. *See id.* at 1-4 ("[O]ne of the main purposes of the proposed actions in this SPEIS is to make the Complex more responsive."); *see also id.* at 2-2 ("The alternatives analyzed in this SPEIS are based on the need for a more responsive Complex infrastructure. . . .").

"Responsiveness" is defined in the document as "the ability to successfully execute requirements of the national security mission on schedule and react to new developments." *Id.* at 1-4; *see also id.* at 2-10. The Draft SPEIS also specifically states that the "lack of a sufficient [plutonium] pit production capacity" is evidence of a "[l]ack of responsiveness." *Id.* at 2-10.

11|3A (cont)

Where does the need for "responsiveness," which includes having "sufficient" plutonium pits,

[4] *See, e.g.*, 40 C.F.R. §§ 1500.2(b) and 1502.8; *see also* Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, 59 Fed. Reg. 7629 (Feb. 11, 1994) at § 5-5 (c).

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11|3A (cont)

come from? The Draft SPEIS recounts DOE's views of relevant history, highlighting two documents in particular. As explained in the Draft SPEIS, in 1996, the DOE prepared a supplemental programmatic environmental impact statement on Stockpile Stewardship and Management and this Draft SPEIS is an update of that previous document. *See, e.g., id.* at S-3. The DOE explains that updates are needed in order to "support existing and reasonably foreseeable national security requirements." *Id.* at 2-1. One particular document, however, is highlighted throughout the Draft SPEIS as the expression of those national security requirements: the 2001 Nuclear Posture Review – a "classified report prepared by the Department of Defense that establishes the broad outline for future U.S. nuclear strategy, force levels, and infrastructure." *Id.* at S-4 fn.7; *see also* DOE, *Notice of Intent to Prepare a Supplement to the Stockpile Stewardship and Management Programmatic Environmental Impact Statement - Complex 2030*, 71 Fed. Reg. 61731 (Oct. 19, 2006) at 61733 ("The current policy is contained in the Nuclear Posture Review, submitted to Congress in early 2002. . . "). According to the Draft SPEIS, the 2001 Nuclear Posture Review sets forth a "new balance between a responsive infrastructure and deployed stockpile size." Draft SPEIS at S-4; *see also id.* at 2-7. Indeed, the Draft SPEIS states that having a responsive infrastructure is the "cornerstone" of the new strategy discussed in the 2001 Nuclear Posture Review. *Id.* at 2-10.

12|1C

Although the language is somewhat veiled to the public by using terms such as "demonstrated capabilities," or a "requirement for adequate production capacity for plutonium pits, "*see, e.g., id.* at S-4 and 2-12, it appears that responsiveness as it relates to the 2001 national security requirements for plutonium pits means having the infrastructure in place capable of building lots of plutonium pits even if those pits may not ever be made or needed for use. *See, e.g., id.* at S-13, 2-21, and D-9.[5]

Consequently, although it is not clearly stated in the purpose and need section of the Draft SPEIS, the ability to increase pit production is part of the purpose and need for the DOE's proposed action. *See, e.g., id.* at 3-131 (explaining that the expected environmental impacts on construction of a Consolidated Plutonium Center at 125 plutonium pits per year would not be significantly different than the impacts of producing 80 pits per year but the larger capacity "provides better assurance of meeting the purpose and need for production of pits."). This is borne out in the discussion of the alternatives.

[5] It is sophistry for DOE to describe the goal as merely providing the required capacity at LANL to produce more plutonium pits without having to actually ever produce those additional pits. Nuclear weapons infrastructure requires large, long-term commitments of capital. Why would it make sense for the American taxpayers to foot the bill to build, equip, and staff highly-specialized factories that cost billions of dollars if the idea were to simply mothball these structures once built? Moreover, how does building multi-billion dollar structures that may never be needed actually meet the stated purpose of creating a cost-effective infrastructure? As discussed herein, there appears to be no rush to set these wheels in motion, given the state of the science on pit longevity and recent changes to the law.

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3|5C.1 (cont.); 13|3.0

The alternatives in the Draft SPEIS, besides what we assume is the No Action alternative,[6] actually would increase plutonium pit production capacity, including one alternative that would increase plutonium pit production capacity up to 200 pits per year, ten times more than the current level allowed. With the exception of the No Action alternative, the lowest pit manufacturing capacity assumed for the nuclear production alternatives is 50 pits per year, which is, in and of itself, a substantial increase over the current 20 pits per year authorized at LANL and the current rate of pit production at LANL of approximately 10 pits per year. *See id.* at 2-12 and 2-20. What we assume to be the No Action alternative - staying at the only currently authorized level of plutonium pits, which is 20 pits per year in accordance with the Record of Decision for the LANL 1999 site-wide environmental impact statement - is described in the Draft SPEIS as now being *below* what is a "reasonable assumption for a production capacity." *Id.* at 2-22. In fact, the Draft SPEIS even goes as far as stating that the Capability-Based Alternative of 50 pits per year is based upon an assumption of stockpiles that are "smaller than required to meet anticipated future national security needs." *Id.* at 3-62. In other words, the at times elusive references to "responsiveness" based upon national security requirements appear to correlate to a necessary minimum pit production and this has become an underlying purpose that must be met, although it is not stated in any concise or obvious way in the purpose and need section of the document.

(B) *Why this imbedded assumption is not reasonable to include in the purpose and need statement for this SPEIS*

12|1C (cont)

Even if Santa Clara Pueblo were to assume that DOE is simply trying to execute its required duties through this SPEIS, and that somehow it may have been reasonable at one point to assume increased plutonium pit capacity as part of the purpose for the proposed nuclear weapons complex transformation, such an assumption is no longer reasonable in light of new mandates from the President and the Congress coupled with the DOE's own admissions in the Draft SPEIS.

11|3A (cont)

The Draft SPEIS contains repeated statements to the effect that the DOE has no choice but to fulfill the stockpile size and national security requirements "established by the President and Congress." *See, e.g.*, Draft SPEIS at 1-21, 2-1, and 3-1. As discussed above, the Draft SPEIS makes the link between an increase in plutonium pit production with fulfillment of the requirements of the President and Congress, and wraps pit production into part of the purpose and need for the proposed action.

However, the latest pronouncement of the President and the Congress has set forth a new set of

[6] As discussed in section II of our comments, the Draft SPEIS contains contradictory statements as to what is the No Action alternative.

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requirements to be followed and makes clear that certain tasks need to be completed first by the Congress and the Department of Defense before any decisions are made by the DOE regarding the size and shape of the nuclear weapons complex, including the appropriate level of plutonium pit production capacity.

12|1C (cont)

At the end of January 2008 (after the release of the Draft SPEIS), President Bush signed into law the National Defense Authorization Act for Fiscal Year 2008, Pub. L. 110-181. In this new law, there is a requirement that a new Congressional Commission on the Strategic Posture of the United States be established. This Commission is tasked with reviewing the current nuclear weapons policies of the United States and then issuing a report by December 1, 2008 recommending the appropriate sizes and composition of the future nuclear weapons stockpile and the size of the nuclear weapons complex. *See id.* at § 1062. This new law also requires that a "Revised Nuclear Posture Review" be completed by the Secretary of Defense in 2009 in order to address the necessary sizes and composition of the nuclear weapons stockpile and complex for the next 5 to 10 years, including "any plans to modernize or modify the complex." *Id.* at § 1070.

The DOE has stated at its public hearings for Complex Transformation that the Record of Decision for the SPEIS must be issued by autumn of 2008. The very terms of this new law make clear that having the DOE lock in a Record of Decision this autumn for a preferred alternative to modify the existing nuclear weapons complex would be premature and would contravene the expressed intent of the President and the Congress.

When Santa Clara Pueblo inquired of our Congressional Delegation why it is appropriate to push forward with the Complex Transformation SPEIS process in light of this new law, the DOE responded that the current alternatives analyzed in the Draft SPEIS would encompass any recommendations resulting from requirements in the new law and that the current alternatives in the Draft SPEIS provide "considerable flexibility" for future decisions. *See* Letter from Theodore A. Wyka, Complex Transformation SPEIS Document Manager, NNSA, to Hon. J. Michael Chavarria, Governor, Santa Clara Pueblo (April 2, 2008)(on file with the Pueblo). The DOE's response, however, is not reasonable in light of the facts and should be reconsidered so as to avoid thwarting Congressional intent.

If the current thinking by DOE on alternatives for modernization of the nuclear weapons complex or the nuclear stockpile requirements were sufficiently flexible as alleged by DOE, why would Congress include a requirement in this newly-enacted law that a new Revised Nuclear Posture Review be issued by 2009 which, among other things, specifically addresses any plans to modernize or modify the complex? When these new mandates were put in place, the Congress was already aware of the DOE's concepts for the Complex Transformation process, especially with respect to increasing plutonium pit production capacity, which DOE has stated has been underway ever since the 2001 Nuclear Posture Review was transmitted to Congress in early

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2002. *See* Draft SPEIS at 3-1. Congress was briefed on the DOE's vision for the transformation when DOE forwarded the recommendations of the Secretary of Energy Advisory Board Task Force on the Nuclear Weapons Complex Infrastructure to Congress on October 19, 2005. *See* DOE/NNSA, *Complex 2030. An Infrastructure Planning Scenario for a Nuclear Weapons Complex able to meet the Threats of the 21st Century*, DOE/NA-0013 (Oct. 23, 2006) at 7. Thus, it is not reasonable, and indeed somewhat self-serving and disingenuous, for the DOE to assume that its current purpose and need description and current alternatives discussed in the Draft SPEIS meet these new mandates.

11|3A (cont.)

Moreover, and more importantly, in the Draft SPEIS, the DOE admits that the need for increased plutonium pit production capacity could change with a different stockpile requirement. The Draft SPEIS acknowledges that, although a change in stockpile size alone would not necessarily change the need for nuclear weapons laboratory facilities, a change in stockpile size could actually change the need for nuclear weapons production facilities. *See* Draft SPEIS at 3-67. Such an admission clearly undermines the argument that the current purpose and need articulation and alternatives in the Draft SPEIS would necessarily encompass any recommendations resulting from fulfillment of the requirements of the new law, especially as it relates to plutonium pit production capacity.

3|5C1 (cont.)

In the Draft SPEIS, the DOE also admits that "[t]he latest studies on pit aging indicate that pits currently in the stockpile may be viable for more than 85 years." *Id.* at 3-132. As a result, the DOE admits in the Draft SPEIS that "it is unlikely that legacy pits will need to be replaced in the near future." *Id.* at 2-9. In fact, the study to which DOE refers specifically states that there is no evidence for concern about the reliability of legacy plutonium pits for the next century.[7] In addition, the DOE admits in the document that "lower pit production rates may be an acceptable

[7] The study referenced by DOE was conducted by the JASON group, an independent panel of scientists who provide analysis to the government. It indicates that the expected lifetime of existing plutonium pits is on the order of 100 years:

> Most primary types have credible minimum lifetimes in excess of 100 years as regard aging of plutonium; those with assessed minimum lifetimes of 100 years or less have clear mitigation paths that are proposed and/or being implemented.
>
> The Laboratories have made significant progress over the past 3-5 years in understanding plutonium aging and pit lifetimes. . . . As a result of the Los Alamos/Livermore efforts, JASON concludes that there is not evidence from the [underground nuclear explosion testing] analyses for plutonium aging mechanisms effecting primary performance on timescales of a century or less in ways that would be detrimental to the enduring stockpile.

JASON Program Office, *Pit Lifetime*, JSR06-335 (Jan. 11, 2007) at 1, http://www.fas.org/irp/agency/dod/jason/pit.pdf.

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3|5C1 (cont.)

programmatic risk in view of the pit surveillance data, and the existence of a potential pit reuse option and cost." *Id.* at 3-131. At a minimum, the Draft SPEIS cautions that "judgments about new pit production capabilities and capacities are complex and warrant careful consideration." *Id.* at 2-13. Consequently, at least with respect to decisions regarding plutonium pit production, by DOE's own admissions, there is no national security need for DOE to rush to a decision before the end of 2008.

12|1C (cont)

The Draft SPEIS reveals that the 2001 Nuclear Posture Review sets forth the requirements for "responsive" infrastructure, which as discussed above, includes increased capacity for plutonium pit production. The DOE defines a Nuclear Posture Review as a "classified report prepared by the Department of Defense that establishes the broad outline for future U.S. nuclear strategy, force levels, and infrastructure." *Id.* at S-4. Thus, by definition, the new Revised Nuclear Posture Review mandated in the National Defense Authorization Act for Fiscal Year 2008 will establish that broad outline for infrastructure, which may not be the same as the requirements in the 2001 Nuclear Posture Review. To assume that the current set of alternatives regarding increased plutonium pit capacity in the Draft SPEIS that are based in large part on the 2001 Nuclear Posture Review will be in line with the national security requirements that must be set forth in a 2009 Revised Nuclear Posture Review is simply not reasonable. To push "full steam ahead" to a Record of Decision this autumn to lock in infrastructure parameters for plutonium pit production for the next 65 years when new parameters will actually be issued within the next year also does not the definition of reasonable. This is especially so since the DOE has admitted (despite the imbedded assumptions in its purpose and need statement) that there is no need for new pits in the near future and lower pit production rates may be a viable option.

(C) *The Complex Transformation SPEIS process must be held in abeyance until the mandates of the new 2008 law are fulfilled and then a revised draft SPEIS must be issued with additional public comment allowed*

Agencies draft a purpose and need statement in an environmental impact statement to describe what they are trying to achieve by proposing an action. The purpose and need statement explains to the public why an agency action is necessary, and it serves as the basis for identifying the reasonable alternatives available to the agency. *See* 40 C.F.R. § 1502.13. The identification and evaluation of alternative ways of meeting the purpose and need of the proposed action is the "heart of the environmental impact statement." *Id.* at §1502.14. Consequently, if the description of the purpose and need is flawed or contrary to law, then the evaluation of alternatives also will be skewed, rendering faulty the entire NEPA analysis. That is exactly what has occurred here, especially with respect to the short shrift given to the plutonium pit production capacity described in the No Action alternative or even the Capability-Based alternative resulting from what now appears to be an overly narrow articulation of a need to increase pit production.

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In light of the latest national security pronouncements of the Congress and the President contained in the National Defense Authorization Act for Fiscal Year 2008, the purpose and need statement in the Draft SPEIS, especially as it relates to increased plutonium pit production capacity, is no longer accurate with respect to fulfilling national security mandates. What is needed is actually the subject of this new law. The Congress and the President have indicated through this new law that the needs will be reassessed and determined within the next year. That is why trying to complete this Complex Transformation NEPA process in the next few months is folly and by definition cannot produce a defensible analysis. The DOE has no sound basis to even evaluate a reasonable alternative until the requirements of the new law are satisfied. The DOE would be attempting to sidestep Congressional will and that does not meet the definition of reasonable.

The proposed action contemplated in the Draft SPEIS will affect, at a minimum, the next 65 years of operations of the entire nuclear weapons complex. Given the magnitude of the decisions at issue and the span of time those decisions could cover, this NEPA process must be set aside until the mandates of the new law, including the Revised Nuclear Posture Review, are completed. Then, a revised draft SPEIS should be issued in accordance with the updated national security framework with an opportunity for review and comment by the public and with proper government-to-government consultation with Santa Clara Pueblo.

IV. The Draft SPEIS does not adequately or reasonably address cumulative health and other impacts to the Santa Clara Pueblo community in contravention of Presidential directives and CEQ guidance regarding environmental justice and in violation of NEPA

14|14J1; 15|14.0; 16|14K

This section of our comments focuses primarily on cumulative impacts through the lens of human health risks but our underlying point about the requirement that DOE better address the effects of multiple environmental exposures to the Pueblo applies in equal force to other sections of our comments, where we highlight a substantial number of environmental impacts to Santa Clara Pueblo that were inadequately addressed or overlooked completely in the Draft SPEIS.

(A) *DOE underestimated health risks, cumulative impacts, and environmental justice*

In the Draft SPEIS, the DOE used CAP-88, an atmospheric transport model designed by the Environmental Protection Agency ("EPA"), to estimate dose and risk from radionuclide air emissions as part of Clean Air Act compliance. The DOE used CAP-88 to calculate the highest effective dose equivalent for an assumed Maximally Exposed Individual ("MEI") for emissions of radionuclides other than radon. It appears assumed doses for both workers and the public were converted to address cancer fatalities resulting from annual assumed dosages for each

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contaminant modeled, to see if any dosage exceeded public health standards that could lead to cancer fatalities beyond the normal annual rate of cancers. *See, e.g.*, Draft SPEIS at 4-46, 5-22 through 5-24, and B-13. In the Draft SPEIS, the DOE admits that "[r]adiation exposure can also cause nonfatal cancers and genetic disorders" but states that "[i]n this SPEIS, only estimates of potential fatal cancers are presented." *Id.* at C-9 and C-10. This omission from the analysis is a very serious matter. The causation of nonfatal cancers and/or genetic disorders within a distinct subpopulation of peoples, namely the few thousand members of the Santa Clara Pueblo community, can actually limit the very continued existence of our society.

2|14J1 (cont)

13|14K4

It does not appear that any additional consideration was given in the Draft SPEIS to modeling additional exposure pathways utilized by Santa Clara Pueblo or to the assessment of cumulative health effects, and the environmental justice impacts resulting therefrom.

(i) *Outdated version of model used and exposure pathways underestimated by DOE*

It appears that the version of the CAP-88 model used in the Draft SPEIS is outdated and not as complete as the most recent version. The Draft SPEIS references that calculations performed for the analysis used EPA's 1992 version of the CAP-88-PC model (Revision 1.0.). *See* Draft SPEIS at 4-46. The rationale for using this early version of the risk modeling software is unclear, since revisions to the CAP-88 model were released in 2000 (Version 2.0), 2001 (Version 2.1), and 2006 (Version 3.0), with three interim software updates provided in 2007. There exist significant differences between Version 1.0 and Version 3.0 of the CAP-88 radiation risk assessment models. Version 1.0 incorporates the use of 265 radionuclides and 6 decay chains in order to calculate the dose for 7 internal organs, while Version 3.0 incorporates the use of 825 radionuclides and the multitude of decay chains listed in the Federal Guidance Report No. 13[8] to calculate the dose for 23 internal organs. *See* EPA, *Radiation Risk Assessment Software: CAP88 and CAP88-PC*, http://www.epa.gov/radiation/assessment/CAP88/index.html. The EPA states that "Version 3 includes an expanded library of radionuclides and incorporates updated radionuclide risk conversion factors" and is a "significant update to Version 2.1." Because "Version 3 will generate dose and risk results that differ from those results calculated by previous versions," the EPA recommends that the Version 3.0, the most updated version, be used in analyses. *See* EPA, *National Emission Standards for Hazardous Air Pollutants (Radionuclides), Availability of Updated Compliance Model*, 71 Fed. Reg.8854 (Feb. 21, 2006). Thus, it appears that the human health impact assessment in the Draft SPEIS relies on an outdated version of a radiation risk model.

14|14K19

[8] EPA, *Cancer Risk Coefficients for Environmental Exposure to Radionuclides, Federal Guidance Report No. 13, EPA 402-R-99-001* (Sept. 1999).

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2|14J1 (cont)

It also appears that the CAP-88 modeling in the Draft SPEIS did not take into account additional exposure pathways, above and beyond an assumed Maximally Exposed Individual, for Native American traditional uses of the land. The Complex Transformation Draft SPEIS does generally acknowledge that Pueblos use unfiltered surface water sources for ceremonial purposes (although Santa Clara Pueblo is conspicuously absent from the list of Pueblos in this section of the document, despite the fact that our closest border to LANL is only approximately five miles away). *See* Draft SPEIS at E-12. The document also generally acknowledges that ingestion of edible plants near LANL may provide an exposure pathway by which radionuclides and nonradionuclides can be transferred to humans. *See id.* at 4-34 and 4-35. However, unlike the draft LANL SWEIS, actual additional exposure pathways of a Native American user of these and other sources do not appear to be part of the modeling of impacts that was conducted for the Draft SPEIS. If such additional pathways are part of the modeling for the Draft SPEIS, it is certainly not clearly stated in the document or readily apparent to the Pueblo (so that we could conduct any meaningful review of assumptions), which in and of itself violates NEPA standards for a draft environmental impact statement.

At Santa Clara Pueblo, our practices result in exposures beyond exposures experienced by the general public. Pueblo members collect and utilize numerous wild plants and herbs for medicinal and other cultural purposes. When we harvest elk or deer, in addition to the meat, we consume the bone marrow, the organs, and the blood. We utilize the clays and the sands of the region for our crafts. The pigments applied to the pottery made by our world-famous artists come from the soils and are often applied by licking the brushes, which are often made of natural materials. Unlike the general public, Santa Clara Pueblo members utilize springs and seeps and other surface sources of water in our traditional areas in their natural, unfiltered state, as part of our cultural practices. Thus, exposure pathways are considerably more for Santa Clara Pueblo members than the average off-site citizen, even the average off-site Maximally Exposed Individual.

(ii) *DOE disregarded past cumulative impacts*

17|14K3

As for cumulative impacts, in addition to underestimating the number of environmental pathways or exposure routes, the Draft SPEIS appears to focus on additive effects of each single chemical or radiological agent or stressor, rather than addressing the combined impact of multiple stressors and the potential for interaction amongst different stressors. As discussed below, although the CEQ regulations for NEPA define cumulative impacts to ensure that past actions are taken into account when assessing the incremental effects of the proposal, the DOE dismisses the need to account for the past human health and environmental exposures by basically stating it is too difficult to do a real cumulative effects analysis (especially for cumulative impacts of low level radiation), *see id.* at C-4, so "[h]istorical impacts at the potentially affected sites are captured in the existing No Action Alternative." *Id.* at 6-1. It appears that DOE simply assumes past impacts

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are part of the natural background now and did not account for natural background radiation levels when assessing cumulative environmental impacts in the Draft SPEIS.

17|14K3 (cont)

This paltry analysis of past actions seems to defy logic when one compares it to the 2006 draft LANL SWEIS. Even in that 2006 draft document, where additional exposure pathways were acknowledged but still underestimated for Santa Clara Pueblo, the DOE stated that additional exposures of a so-called Special Pathways user would result in a dose of 4.5 millirem per year. *See* 2006 draft LANL SWEIS at C-39. This dosage was assumed to be in addition to that which the offsite MEI experiences. *See id.* at C-27. The DOE also stated in that analysis that "the highest estimated ingestion pathway dose to any offsite resident is about 4.5 millirem per year from radionuclides in the environment resulting from past LANL operations, global fallout, and naturally-occurring geologic sources." *Id.* at C-39. In addition, the document stated that the highest assumed dose for the then-proposed expansion of LANL (to produce up to 50 plutonium pits annually) would be 7.8 millirem per year. *Id.* Thus, if one adds these figures together, it appears from the analysis in the 2006 draft LANL SWEIS that the highest assumed total dosage for Santa Clara Pueblo members for what is now called the Capability-Based Alternative in the Draft SPEIS, taking into account such operations plus additional exposure pathways for Native American traditional practices as well as background radiation from past actions, could result in a total annual dose of 16.8 millirem per year. According to the Complex Transformation Draft SPEIS, this far exceeds acceptable annual dose standards for members of the public. Draft SPEIS at C-8 ("[N]o member of the public [may] receive an annual dose greater than 10 mrem from the airborne pathway and 4 mrem from ingestion of drinking water."). This significant health risk, however, is not acknowledged for the Capability-Based Alternative in the Draft SPEIS which is supposed to be the equivalent of what was once termed "expanded operations" in the LANL SWEIS process. *See, e.g., id.* at 5-73.

(iii) *Environmental justice wrongly dismissed by DOE*

2|14J1 (cont)

In the Draft SPEIS, DOE asserts that there are no environmental justice concerns with its proposed action or preferred alternative as none of the impacts, to the extent there are any, are disproportionately high for Santa Clara Pueblo. The environmental justice analysis in the Draft SPEIS is woefully slim but we focus here on the analysis as it relates to LANL operations.

The Draft SPEIS states:

> Based on the analysis of impacts for resource areas, few high and adverse impacts from construction and operation activities at LANL are expected under any of the alternatives; to the extent that any impacts may be high and adverse, [the DOE through] NNSA expects the impacts to affect all populations in the area equally.

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Draft SPEIS at 5-65.

The document also states that none of the human health impacts were determined to be high and adverse, so there was no need to then determine if any health impacts were disproportionate. *Id.* at B-11 and B-12. As discussed below, this does not come close to meeting the full intent of a required environmental justice analysis.

(B) *Environmental justice guidance and NEPA regulations and guidance establish the standards that must be met to address cumulative impacts.*

Executive Order 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, 59 Fed. Reg. 7629 (Feb. 11, 1994) ("Executive Order 12898"), provides that "each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations." Executive Order 12898 makes clear that the provisions apply fully to Native Americans. In 1997, CEQ issued a guidance document regarding environmental justice that "interprets NEPA as implemented through the CEQ regulations in light of Executive Order 12898." *See* Council on Environmental Quality, *Environmental Justice: Guidance Under the National Environmental Policy Act* (Dec. 10, 1997), http://ceq.eh.doe.gov/nepa/regs/ej/justice.pdf ("CEQ Environmental Justice Guidance").

As explained in the CEQ Environmental Justice Guidance, Executive Order 12898 "recognizes the importance of research, data collection, and analysis, particular with respect to multiple and cumulative exposures to environmental hazards for low-income populations, minority populations, and Indian tribes. Thus, data on these exposure issues should be incorporated into NEPA analyses as appropriate." *Id.* at 3.

The CEQ Environmental Justice Guidance sets forth a number of factors that agencies are supposed to consider when determining whether human health effects or environmental effects are disproportionately high and adverse. Among them are two that specifically look to cumulative impacts:

> [w]hether health effects occur in a minority population, low-income population, or Indian tribe affected by cumulative or multiple adverse exposures from environmental hazards . . . .
>
> [and]
>
> [w]hether the environmental effects occur or would occur in a minority

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> population, low-income population, or Indian tribe affected by cumulative or multiple adverse exposures from environmental hazards.

Id. at 26 and 27.

The CEQ is clear that exposure can mean contact with a chemical, biological, physical, or radiological agent. The guidance also clarifies that multiple exposures address more than one agent from single or multiple sources that have the potential for deleterious health or environmental effects, and that cumulative exposure can result from exposure to one or more agent from single or multiple sources over time in one or more locations. *Id.* at 30.

These cumulative impact standards embodied in the CEQ Environmental Justice Guidance are not mere guidelines, however. The CEQ Environmental Justice Guidance is completely in keeping with NEPA mandates as well, and the courts have recognized that CEQ's interpretation of NEPA is entitled to deference.

As the Draft SPEIS indicates, when looking at environmental impacts of a proposed action, the affected environment is "interpreted comprehensively to include the natural and physical environment and the relationship of people with the environment." Draft SPEIS at 4-1 (*citing* 40 C.F.R. §1508.14). This includes interrelated social and economic effects. 40 C.F.R. §1508.14. NEPA regulations also are clear that agencies, in assessing cumulative impacts, have to address "the impact on the environment which results from the incremental impact of the action when added to other *past*, present and reasonably foreseeable future actions" and that such cumulative impacts "can result from individually minor but collectively significant actions taking place over a period of time." *Id.* at §1508.7 (emphasis added).

The CEQ has even issued guidance on how to address past actions to meet NEPA regulatory mandates regarding cumulative impacts. *See* Memorandum from James L. Connaughton, Chairman, Council on Environmental Quality to Heads of Federal Agencies, *Guidance on the Consideration of Past Actions in Cumulative Effects Analysis* (June 24, 2005), http://www.nepa.gov/nepa/regs/Guidance_on_CE.pdf ("CEQ Past Actions Cumulative Effects Guidance"). The CEQ emphasizes that "delving in to the historical details of individual past actions" is not necessary but that a cumulative impact analysis should include the "current aggregate effects of past actions" when those past actions are relevant to determining "whether the reasonably foreseeable effects of the agency proposal for action and its alternatives may have a continuing, additive and significant relationship to those effects." CEQ Past Actions

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Cumulative Effects Guidance at 1 and 2.[9]

Thus, it is the very requirements contained in NEPA regulations themselves, as further amplified through Executive Order 12898 and CEQ guidance, that set the standards that DOE failed to follow in assessing cumulative impacts to Santa Clara Pueblo in the Draft SPEIS. As discussed below, the Draft SPEIS does not contain sufficient detail regarding these multiple exposures and cumulative effects to allow Santa Clara Pueblo to participate in a meaningful review, allow for meaningful decision-making, or to even demonstrate that the DOE has taken the necessary hard look at these critical issues.

(C) *DOE ignored environmental justice and NEPA requirements regarding cumulative impacts*

In the Draft SPEIS, the DOE indicates that it complied with Executive Order 12898 and used CEQ guidance and methodology for addressing cumulative impacts. *See* Draft SPEIS at B-11 and B-27. However, despite its attempts, DOE did not fulfill the mandates of the law in the Draft SPEIS.

2|14J.1 (cont.)

The guidance and regulations make clear that more must be done than what appears to be DOE's approach of viewing risk for each exposure or stressor individually, even if maximum exposure to the general public is assumed with each stressor then added together for a total. The DOE assumes, looking at national statistics, that "approximately 1,714 fatal cancer deaths per year" out of 1,000,000 people will happen naturally near any DOE site at issue in the Complex Transformation SPEIS alternatives and thus risk must be measured in cancer fatalities above that general population figure. Draft SPEIS at C-10. This shows complete disregard for the fact that the Santa Clara Pueblo community is a unique society and culture unto itself numbering only a few thousand people where any increased disease, illness, genetic disorder, or health risks have far greater effects to our survival as a people.

It also misses a critical part of the required environmental justice analysis, which involves more than fatality statistics of our Tribal community as compared to the general population. In fact, CEQ guidance instructs that the analysis must go farther than simply comparing overall health risk rates for the Santa Clara community to those rates generally accepted as being risky. CEQ

[9] Although these past effects are not analyzed in a cumulative effects analysis in the Draft SPEIS, the DOE implicitly admits there are aggregate effects of past actions necessitating a cumulative impact analysis by stating statistics regarding how much the various wastes would be decreased if plutonium operations were phased out completely from LANL. *See, e.g.*, Draft SPEIS at 5-97 (discussing 11 percent decrease of low level waste, 14 percent decrease of mixed low level waste, and 80 percent decrease of transuranic waste at LANL if plutonium operations were eliminated from LANL). While these figures are helpful, a mere recitation of percentages does not meet the NEPA definition of a cumulative impacts analysis.

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guidance instructs that the focus of the analysis must also include whether there are health effects or whether there could be environmental effects for an Indian Tribe based upon cumulative or multiple adverse exposures from environmental hazards. *See* CEQ Environmental Justice Guidance at 26 and 27. As we have described, this is not just an environmental justice issue, but a requirement of NEPA too. *See* 40 C.F.R. §1508.7 and CEQ Past Actions Cumulative Effects Guidance.

As documents in the public illustrate, the current aggregate effects of past actions are relevant at LANL in order to determine whether the proposed action and alternatives making permanent plutonium pit production at LANL may have a continuing additive and significant relationship to those past effects. Since 1999, the Center for Disease Control and Prevention ("CDC") through its Los Alamos Historical Document Retrieval and Assessment Project ("LAHDRA Project") has been identifying information concerning past releases of radionuclides and hazardous chemicals from LANL occurring since 1943 in order to determine potential off-site health effects. *See* CDC, *Interim Report of the Los Alamos Historical Document Retrieval and Assessment Project* (March 2007) at 1, http://www.lahdra.org/reports/LAHDRA%20Report%20v5%202007.pdf. Through the LAHDRA Project, the CDC has already uncovered documents revealing that airborne releases of plutonium from LANL following the Manhattan Project may be on an order of magnitude greater than officially reported, constituting the largest airborne release of plutonium of all of the DOE sites around the country. *See* LAHDRA Project public meeting notes (July 18, 2007), http://www.lahdra.org/meetings/mtg_15/mtg_15.htm.

18|14K10

Another example can be found from a recent news release from DOE's own Argonne National Laboratory. That release states that scientists have been struggling for decades to address the concern about "plutonium contamination spreading further in groundwater than expected, increasing the risk of sickness in humans and animals." In fact, the Argonne National Laboratory has indicated that plutonium nanoclusters travel more readily through soil and into groundwater in ways that have eluded proper study and remediation for "almost half a century." Argonne National Laboratory, *News Release: Scientists discover how the structure of plutonium nanocluster contaminants increases risk of spreading* (April 22, 2008), http://www.anl.gov/Media_Center/News/2008/news080422.html.

These are only a few examples but they serve to demonstrate that documents within the public domain indicate aggregate effects of past actions at LANL are significant as that term is defined in NEPA and must be addressed through a proper cumulative effects analysis. *See* 40 C.F.R. §1508.27; *see also* CEQ Past Actions Cumulative Effects Guidance at 3. Summarily writing off such past aggregate effects as simply being subsumed in the No Action alternative does not meet the mandates of NEPA.

Although DOE has indicated that it did not do the analysis because it is difficult to track multiple

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exposures, *see* Draft SPEIS at C-4, it is important to note that a framework does exist to address cumulative impacts in the context of NEPA and environmental justice. In May 2003, the EPA established such a framework. *See* EPA, *Framework for Cumulative Risk Assessment*, EPA/630/P-02/001F (May 2003), http://cfpub.epa.gov/ncea/cfm/recordisplay.cfm?deid=54944 ("EPA Cumulative Risk Framework"). The EPA's approach looks at the specific subpopulations of a place and considers various stressors affecting them, including how multiple stressors can act together over time. *See* EPA Cumulative Risk Framework at 2. EPA does indicate that an MEI approach with each individual stressor being combined later is a method that is used, but EPA cautions against approaches that ignore synergistic or antagonistic interactions. In other words, it is important to assess how some chemicals or agents may have the ability to affect a response to other chemicals or agents. *Id.* at 50 and 66. EPA emphasizes the need for a cumulative risk assessment to look at multiple stressors, in addition to dealing with time-related aspects, susceptibility concerns, and subpopulations with particularly distinctive exposures. *Id.* at 37-42. The EPA's framework views risk assessment as including environmental, health, social, and cultural factors and the EPA states that its framework is consistent with the definition of cumulative impacts in NEPA. *Id.* at 9.

EPA states that a cumulative risk assessment is "an analysis, characterization, and possible quantification of the combined risks to human health or the environment from multiple agents or stressors." *Id.* at 6. As detailed above, DOE did not perform any analysis that comes close to meeting that definition, especially with respect to Santa Clara Pueblo, and thus did not fulfill the mandates of NEPA, Executive Order 12898, and numerous guidance from CEQ regarding cumulative impacts to the Santa Clara Pueblo community. In order to remedy these problems, at a minimum, the DOE must conduct government-to-government consultation with Santa Clara Pueblo on proposed revisions to the draft to fix these defects, prepare a revised draft SPEIS, and then allow the public the opportunity to review and comment on the revised draft document.

4|2C2 (cont)

V. Additional impacts to Santa Clara Pueblo not addressed in the Draft SPEIS

In this section, we highlight additional concerns for Santa Clara Pueblo that also were not adequately addressed in the Draft SPEIS.

(A) *Waste impacts*

Recently, the Inspector General for the DOE audited DOE's compliance record for meeting the Consent Order, a binding document signed by DOE and the New Mexico Environment Department to address the clean-up of legacy waste that was disposed in pits, trenches, shafts, and landfills at LANL. *See* DOE Office of Inspector General, *Audit Report: The Department's Progress in Meeting Los Alamos National Laboratory Consent Order Milestones* (DOE/IG-

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0793)(April 2008), http://ig.energy.gov/documents/IG-0793.pdf ("Consent Order Audit"). This audit reveals that, "absent a dramatic change in approach, it is unlikely that the Department will complete certain long-term remediation activities at Los Alamos in accordance with existing requirements." *Id.* at 1. The audit also states that "[d]elays in completing the substantial remediation work associated with the Consent Order milestones may increase the risk of employee and public exposure to contaminants." *Id.* at 3.

In fact, because of the DOE's deplorable performance in meeting critical Consent Order milestones, the State of New Mexico, through its Environment Department, has gone on record strongly opposing any increases in pit production capability or any expansion of LANL's mission in general. *See* Letter from Ron Curry, Secretary, New Mexico Environment Department to Theodore Wyka, Complex Transformation SPEIS Document Manager (March 27, 2008)(on file with the Pueblo). The State chides the DOE for its "long history in New Mexico of paying lip service to cleanup" and calls it "unconscionable" for the DOE to even consider funding additional pit production while a "60 year legacy of contamination remains unaddressed." *Id.* at 2. Santa Clara Pueblo fully supports the concerns expressed by New Mexico Environment Department Secretary Ron Curry.

19|14M2

Unfortunately, nothing in the Draft SPEIS alleviates our concerns. Effects of past contamination have been disregarded in the document, most notably in the cumulative impacts discussion, as we

20|14M10

describe in section IV of our comments. Furthermore, the document gives little assurances that there is proper capability to handle additional waste that would result from the proposed action.

The Draft SPEIS states all of the Consolidated Plutonium Center alternatives contemplated for LANL would increase transuranic waste, mixed transuranic waste, low level waste, mixed low level waste, hazardous waste, and non-hazardous waste. *See* Draft SPEIS at 5-91. The document indicates that TRU waste would go to a WIPP "or a WIPP-like" facility. *Id.* at A-9. The DOE

21|14M4

admits that there is limited capacity in WIPP and that the amount of transuranic waste generated needing disposal could exceed WIPP capacity. *See id.* at B-27. To quell that concern, the Draft SPEIS contains only a vague statement that, if there is a need, DOE will initiate the appropriate strategies for expanding disposal capacity at the appropriate time. *Id.* In other words, there is not necessarily a waste disposal path for the transuranic waste the DOE is contemplating generating by increasing pit production at LANL.

22|14M7

As for low level waste, the Draft SPEIS states that such low level waste would be disposed of on-site at LANL at TA-54, Area G. *See id.* at 5-92. Yet, as the DOE Inspector General's audit recognizes, DOE has not met Consent Order milestones set for clean-up of past waste dumped at Area G. *See* Consent Order Audit at 2. It is irresponsible to even contemplate adding low level waste to Area G until legacy waste impacts there are actually mitigated.

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22|14M.7 (cont.)

This is not an idle concern to Santa Clara Pueblo. All waste remediation issues affect us, be they "cap and cover" methods that have already resulted in LANL contaminants found in surface and ground waters nearby, or removal methods, where transport off the hill raises its own safety concerns as waste is transported near or through our lands. It is important to remember this area is part of our aboriginal homeland. The lands need to be restored to the same condition they were in before the Manhattan Project. To do anything less is disrespectful of the earth.

9|2A (cont)

Because there is no real cumulative impact analysis regarding legacy waste or real analysis of impacts of generating transuranic waste with no known disposal path, at a minimum, in accordance with 40 C.F.R.§1502.9(a) and the 2006 Accord, the DOE must consult with Santa Clara Pueblo on revisions and then a revised draft SPEIS must circulated for public comment. Impacts to Santa Clara Pueblo resulting from incomplete clean-up of legacy waste, as well as future waste generation, must be acknowledged in the document.

(B) *Seismic impacts*

20|14F1 (cont.)

The preferred alternative in the Draft SPEIS is for LANL to become the permanent site for plutonium pit production for the nation, even though LANL, unlike some of the other sites discussed for the Consolidated Plutonium Center alternatives, has earthquake potential at least as high as 7 on the Richter Scale. *See* Draft SPEIS at 4-31 (Richter scale potential at 7 for Pajarito Fault), 5-198 ("little potential for earthquakes" for Pantex CPC discussed) and 5-269 (no faults located by Savannah River Plant CPC discussed). This is disconcerting in and of itself, but our concerns are compounded by the confusing discussion of seismic risk at LANL in the document, which appears to underestimate impacts, especially relating to Santa Clara Pueblo.

The Draft SPEIS states that:

> [t]he dominant contributor to seismic risk at LANL is the Pajarito Fault System. The main element of the system is the Pajarito Fault. Secondary elements include the Santa Clara Canyon Fault, the Rendija Canyon Fault, the Guaje Mountain Faults, and the Sawyer Canyon Fault.

Id. at 4-29.

This fault system also connects to Santa Clara Pueblo's landbase. It is our current understanding that each of these faults mentioned in the Draft SPEIS connect directly to Santa Clara lands.

The document indicates that five small earthquakes have been recorded in the Pajarito Fault since 1991 and the maximum earthquake potential may be as high as 7 on the Richter scale for the Pajarito Fault, 6.5 for Rendija Canyon, and 6.5 for the Guaje Mountain Fault. *Id.* at 4-30 and 4-

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31. Although parts of the document indicate that a comprehensive update to LANL seismic hazards was completed in 2007, *see, e.g., Id.* at 4-29, 5-41 and 5-76, another section of the document states that a report is still in the process of "being prepared to recalculate the probabilistic seismic hazard at LANL." *Id.* at 4-32.

The Draft SPEIS does admit that "the seismic hazard [at LANL] is higher than previously understood, " and indicates that a "beyond design basis earthquake" could cause radiation exposure that far exceeds public health standards. *Id.* at 5-76 and 5-77. Such risks, however, are dismissed by stating that mitigation measures would be included in the design to alleviate the risks. *Id.*

20|14F1 (cont)

This analysis is confusing and is not clear enough to allow for meaningful review by the Pueblo. The Draft SPEIS is unclear about whether there may or may not be more seismic studies underway for LANL and appears to indicate that we are to take comfort in the fact that design will alleviate any "beyond design basis" earthquake scenarios that may or may not yet be fully understood. An environmental impact statement is supposed to be clear and concise. See 40 C.F.R. §1502.1. The Draft SPEIS does not meet that standard with respect to seismic hazards at LANL.

In any event, what we can ascertain from our review of the 2007 report on seismic hazards for LANL is that detailed high-precision mapping of the Pajarito fault system has not yet been performed, especially with respect to the Santa Clara Canyon segment of the fault system and there is still fairly poor knowledge of certain seismic properties at issue at LANL. *See* URS Corporation, *Final Report- Update of the Probabilistic Seismic Hazard Analysis and Development of Seismic Design Ground Motions at the Los Alamos National Laboratory* (May 25, 2007). Among other things, Santa Clara Pueblo remains concerned that this fault system, which connects to our lands, provides a means of transport for groundwater contamination. This does not appear to be addressed at all in the Draft SPEIS and certainly is not addressed with respect to Santa Clara Pueblo.

CEQ Environmental Justice Guidance instructs that, to be included in an environmental justice analysis, an impact must be "significant" in accordance with NEPA. See CEQ Environmental Justice Guidance at 26. NEPA regulations defining "significantly" instruct that significance can refer to the intensity of an impact which can include unique characteristics of the geographic area such as proximity to cultural resources and the degree to which the possible effects on the human environment involve unique or unknown risks or are likely to highly controversial. *See* 40 C.F.R. §1508.27. Based on the foregoing, the impacts of seismic vulnerability are significant to Santa Clara Pueblo and thus should be addressed as a matter of environmental justice. In any event, the discussion of seismic risk at LANL contains enough contradictory statements to render it "so inadequate as to preclude meaningful analysis." Consequently, in accordance with 40 C.F.R.

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§1502.9 (a) and the 2006 Accord, the DOE must consult with Santa Clara Pueblo on revisions to the analysis and a revised draft SPEIS must circulated for public comment. Impacts to Santa Clara Pueblo resulting from the higher but still uncertain seismic vulnerability of LANL must be acknowledged in the document.

(C) *Air Quality Impacts*

The Draft SPEIS states that LANL is "a major source, based on the potential to emit," of nitrogen oxides, carbon monoxide, and volatile organic compounds. Draft SPEIS at 4-15. The document also states that "[p]it manufacturing activities [at LANL] would result in the release of criteria and toxic pollutants into the surrounding air." *Id.* at 5-21. The greatest increase in annual non-radiological air emissions from the preferred plutonium operations at LANL would be total suspended particulates. *Id.* at 5-22. The radiological air emissions from pit manufacturing would include plutonium, americium, and enriched uranium. *Id.*

23|14D8

Increased emissions as they relate specifically to Santa Clara Pueblo were not analyzed in the Draft SPEIS. Santa Clara Pueblo is downwind of LANL and our closest border is only approximately five miles away from LANL. Monitoring by both the Pueblo and LANL shows that the prevailing winds come from the southwest. Monitoring indicates contaminant transport from LANL to the Pueblo via particulate. Radioactive particulate appears to be at issue in the document for construction workers but impacts are underestimated for Santa Clara Pueblo.

The document appears to state that only construction workers for the additional plutonium pit manufacturing infrastructure at LANL could receive radiation doses above natural background radiation levels. *See id.* at 5-66. Yet, this ignores LANL data regarding the fact that the prevailing winds over Santa Clara Pueblo come from the direction of LANL. It also ignores a recent study prepared by the Government Accountability Project which found that radionuclide movement via airborne particulates is a concern deserving greater attention. *See* Government Accountability Project, *Citizen Environmental Monitoring, Los Alamos, New Mexico* (June 2007), http://www.whistleblower.org/doc/2007/FinalLANLReport.pdf ("GAP Report").

The GAP Report compared levels of radioactivity between indoor dusts and other environmental samples such as sediments or ash. Sampling sites included a number of locations surrounding LANL, some known to be within an impact area and some outside of the known impact zone. *Id.* at 5. The GAP Report revealed that indoor dust samples of areas surrounding LANL contained greater total radioactivity than shown in surrounding soils or various controls and baseline references. Both Picuris Pueblo (which is considerably farther away from LANL than Santa Clara Pueblo) and San Ildefonso Pueblo locations were included in the GAP Report, and residential dusts from both those Pueblos contained some of the most elevated radiation levels. *See id.* at 2.

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23|14D8 (cont)

Thus, given that LANL and Santa Clara Pueblo air monitoring data show the prevailing winds at Santa Clara come from the direction of LANL, and given that the GAP Report shows that dusts are more radioactive than previously understood, construction activities that present radiation risks to the construction workers will impact Santa Clara Pueblo too. This needs to be analyzed in a revised draft SPEIS. Gusty winds are the norm in the springtime in Northern New Mexico and it is reasonable to assume that radioactive materials on the surface can be suspended into the air by gusty winds. It appears construction work could be a major source for air pollutants requiring increased sampling and monitoring. *See* Draft SPEIS at C-6 ("National Emissions Standards for Hazardous Air Pollutants (NESHAP) regulations specify that any source that potentially can contribute greater than 0.1 mrem per year TEDE [total effective dose equivalent] to an off site individual is considered to be a 'major source' and emissions from that source must be continuously sampled.").

There are additional air impacts to the Pueblo resulting from increased traffic which we address below. Emissions, be they radioactive or engine exhaust, that settle in our homes and on our crops and in surface water sources cause impacts to our traditional practices. That is why it is necessary to address those additional pathways for Santa Clara Pueblo in modeling health risks and to conduct a full cumulative impact analysis.

(D) *Traffic Impacts*

24|14L2

In the Draft SPEIS, the DOE does admit that construction of a Consolidated Plutonium Center at LANL would increase traffic, as would operations of such a center, and that the "traffic increase would tend to exacerbate congestion on local roads." Draft SPEIS at 5-88. However, the document states such an increase in traffic would be small compared to the overall daily traffic level. *See id.* This analysis underestimates cumulative impacts to Santa Clara Pueblo.

Santa Clara Pueblo is divided by State Road 30 which commuters use on a daily basis as they travel to the Española Valley's primary employer, LANL. This road passes directly through the middle of the Pueblo, separating two major Pueblo housing areas. Peak traffic on State Road 30 was deemed quite heavy a decade ago and traffic load has already grown exponentially without any expanded plutonium pit production at LANL. We have concerns about the ability of our Pueblo members to be able to cross the road from their homes to our government buildings. At peak commuter hours, it is already extremely difficult to exit the Pueblo village onto State Road 30 or to make a left turn from that road into the Pueblo. Moreover, any increase in traffic due to more LANL commuters would not just be small relative to current levels; it would cumulatively exacerbate pollution problems, including carbon black and diesel exhaust particles which are carcinogenic and have genotoxic effects. These multiple, cumulative impacts to Santa Clara Pueblo need to be addressed.

Chavarria, J. Michael
Page 33 of 37

(E) *Water quantity and quality impacts*

25|14E5 The Draft SPEIS indicates that some of the alternatives involving LANL would actually exceed LANL's water rights. Draft SPEIS at 3-139 and 5-37. Although such options are not the DOE's preferred alternative, the DOE must be clear that any alternative that exceeds LANL's water allotment must not be considered viable because exceeding water allocations in a desert environment clearly would be an irretrievable and irreversible resource commitment, which NEPA prohibits.

26|14E3 While the Draft SPEIS does admit to some contamination of water quality in both surface and ground water in areas offsite of LANL, *see e.g.*, *id.* at 4-25, E-6, E-7,and E-17, [10] the DOE ignores the environmental justice impacts to Santa Clara Pueblo of this contamination. The ground water that is contaminated is the same source of supply as our drinking water. Those impacts were not assessed in the Draft SPEIS. In addition, it does not appear that the DOE assessed how increased pumping by LANL could affect the direction of the ground water contamination plume underlying the Superfund site known as the North Railroad Avenue plume in Española. There, the contaminant of concern is tetrachloroethylene, which the Department of Health and Human Services has determined is reasonably anticipated to be a carcinogen. *See* Department of Health and Human Service, Agency for Toxic Substances and Disease Registry website, *ToxFAQs for Tetrachloroethylene(PERC)*, http://www.atsdr.cdc.gov/tfacts18.html. Would LANL's actions affect the direction of that plume? This must be analyzed. As for surface water quality impacts, the Draft SPEIS acknowledges that area Pueblos use untreated surface water sources for sacred ceremonies, but Santa Clara Pueblo is not even included in the list of such Pueblos. *Id.* at E-12.

27|14J3

2|14J.1 (cont.) A more illustrative example of the lack of regard for environmental justice and cumulative impacts can be found in Table 4.1.5-2 describing surface water and sediment contamination affected by LANL operations. In that table, the significance of elevated radionuclides onsite and offsite are minimized by noting that runoff events are sporadic. The significance of PCBs detected onsite and offsite also are minimized by indicating wildlife exposure in a few canyons is merely "possible." *Id.* at 4-22. Wildlife exposure seems to be underestimated in that table overall and that is distressing since the text below the table clearly states that "[s]tormwater runoff exceeded the wildlife habitat standard for gross alpha activity of 15 picocuries per liter since the Cerro Grande Fire in nearly all canyons." *Id.* Even more distressing is the fact that the Draft SPEIS contains no analysis of how this actually impacts Santa Clara Pueblo.

As we described earlier in these comments, wildlife that consume contaminated surface flows or

[10] One contaminant that does not appear to be addressed in the document, which Santa Clara Pueblo brought to the attention of the DOE in its comments on the 2006 draft LANL SWEIS, is hexavalent chromium, a cancer-causing carcinogen, which has been found in the regional aquifer bordering LANL.

Chavarria, J. Michael
Page 34 of 37

contaminated seeps or springs are used and consumed by Santa Clara Pueblo members as part of our own traditions, in ways that far exceed any exposure to the general public. Even contaminated Rio Grande surface supplies that affect our downstream neighboring Pueblos affect us as well. Our traditions are such that we attend their feast days and consume traditional foods grown by those Pueblos.

The CEQ Environmental Guidance instructs that, when determining whether environmental effects are disproportionately high and adverse, agencies must consider:

> [w]hether there is or will be an impact on the natural or physical environment that significantly (as employed by NEPA) and adversely affects a[n] . . . Indian tribe. Such effects may include ecological, cultural, human health, economic, or social impacts on . . . Indian tribes, when those impacts are related to impacts on the natural or physical environment[.]

CEQ Environmental Justice Guidance at 26.

26|14E3 (cont) The impacts at issue are significant as that term applies to NEPA. *See* 40 C.F.R. §1508.27 (significance analysis can include the extent to which effects on the human environment are uncertain); *see* also Draft SPEIS at E-17 ("Contaminant pathways into the Rio Grande and onto public lands are still being studied and are *poorly understood* due to the complex geohydrology of northern New Mexico.")(emphasis added). Thus, the DOE should have analyzed the effects of the contamination of our waters as it relates to the ecological, cultural, human health, and social fabric of Santa Clara Pueblo.

2|14J1 (cont)

This analysis is lacking in the Draft SPEIS. The remedy is one we have included repeatedly in these comments: these impacts must be acknowledged in a revised draft SPEIS circulated again for public comment and government-to-government consultation with Santa Clara Pueblo must occur prior to the release of the revised draft pursuant to the 2006 Accord.

(F) *Cultural resource impacts*

The Draft SPEIS states that:

> [d]ue to the high density of cultural resources at LANL, relative to other DOE sites under consideration, there is a high probability that resources would be impacted during CPC [Consolidated Plutonium Center] construction anywhere on the LANL site, including TA-55.

Draft SPEIS at 5-53 and 5-54.

Chavarria, J. Michael
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To address this, the DOE states it "would identify and evaluate any cultural resources that could potentially be impacted by the construction of the CPC" and that such "[m]ethods for identification *could* include . . . consultation with interested Native American tribes" *Id.* at 5-54 (emphasis added). This "could" reference is repeated for the different alternatives. *See id.* at 5-55 and 5-56.

DOE's Indian Policy states that the "DOE will be diligent in fulfilling its federal trust obligations to American Indian . . . governments in policy implementation and program management activities." DOE Indian Policy at 2. DOE Indian Policy states that the DOE:

> will consult with any American Indian . . . tribal government with regard to any property to which that tribe attaches religious or cultural importance which might be affected by a DOE action. . . . Such consultation will include tribal involvement in identifying and evaluating cultural resources including traditional cultural properties; facilitating tribal involvement in determining and managing adverse effects; [and] collaboration in the development and signing of memoranda of understanding with DOE, when appropriate.

Id. at 4.

28|14H

The 2006 Accord states that the DOE "will consult with the Pueblo about the potential impacts of proposed actions on the Pueblo and its cultural, religious and environmental resources and will avoid unnecessary interference with traditional practices." 2006 Accord at 3.

To fulfill DOE's Indian Policy and the 2006 Accord, consultation *must* occur with Santa Clara Pueblo to determine whether any cultural resources may be at issue from any activities contemplated at LANL through Complex Transformation and to determine how to prevent adverse impacts.

VI. Next steps DOE must take in addressing these comments, which include government-to-government consultation with Santa Clara Pueblo

4|2C.4 (cont.); 5|14H.1 (cont.)

For the reasons stated above, a new revised draft SPEIS must be issued subject to public review in accordance with 40 C.F.R §1502.9(a). Government-to-government consultation with Santa Clara Pueblo regarding the revisions is required before the revised draft document is issued for additional comment. *See* 2006 Accord at 3 ("DOE will consult with the Pueblo to assure that tribal rights, responsibilities, and concerns are addressed prior to the DOE taking action, making decisions, or implementing programs that may affect the Pueblo."). As a matter of environmental justice and NEPA mandates, impacts to Santa Clara Pueblo discussed herein must be addressed in

Chavarria, J. Michael
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a revised draft SPEIS. Moreover, no final environmental impact statement regarding Complex Transformation should be issued without first consulting with Santa Clara Pueblo to ensure compliance with the 2006 Accord and to ensure DOE has lived up to its commitment to "protect and promote" Tribal Trust resources in order try to avoid impacts to those resources. DOE Indian Policy at 3 (Section i).

4|2C2 (cont)

For impacts that cannot be avoided, mitigation to the Pueblo must then also be the subject of government-to-government consultation before any Records of Decision are issued for this Complex Transformation NEPA process. DOE Indian Policy is clear that, when avoidance of impacts through "DOE trust protection measures" cannot be fully carried out, the DOE will work with the affected Tribe regarding corrective measures. *Id.* Consultation with an affected tribe is also part of the DOE's environmental justice duties. *See* CEQ Environmental Justice Guidance at 10; *see also* Comprehensive Presidential Documents No. 279, *Memorandum from the President to the Heads of Departments and Agencies, EPA-175-N-94-001* (Feb. 11, 1994) at http://www.epa.gov/fedfac/documents/executive_order_12898.htm#memo1.

As we have detailed in section III of these comments, completion of the NEPA process for Complex Transformation or even the issuance of a revised draft SPEIS must not occur until the requirements of the latest national security pronouncements of the President and the Congress, contained in sections 1062 and 1070 of the National Defense Authorization Act for Fiscal Year 2008, Pub. L. 110-181, are fulfilled. To complete any NEPA process on Complex Transformation, especially as it relates to plutonium pit production capacity, in contravention of this new law would result in a faulty and incomplete analysis in violation of NEPA.

VII. Conclusion

The CEQ, in its NEPA regulations, advises that:

> NEPA's purpose is not to generate paperwork--even excellent paperwork--but to foster excellent action. The NEPA process is intended to help public officials make decisions that are based on understanding of environmental consequences, and take actions that protect, restore, and enhance the environment.

40 C.F.R. §1500.1 (c).

It is with this spirit that Santa Clara Pueblo offers these comments, because the environment that we seek to have DOE protect, restore, and enhance, is connected to, and part of, our home and place of worship, which is integral to the cultural survival of the Santa Clara people. The DOE has already admitted in the Draft SPEIS that long-term effects of DOE operations at LANL on the

Chavarria, J. Michael

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05/27/2008 08:55 FAX 2025867554 033/035
05/21/2008 11:10 FAX 034

Mr. Wyka
Santa Clara Pueblo's Comments on the Complex Transformation Draft SPEIS
May 13, 2008
Page 31

biological communities, which depend on the land in such a fragile desert setting, are "especially delicate." Draft SPEIS at 8-1. The DOE also has indicated, as we have discussed above, that LANL has more seismic uncertainty and far more cultural resource impact potential than other sites across the nation considered for a new plutonium center. Consequently, and in light of the numerous additional concerns we raised in these comments, we sincerely hope the DOE will reconsider its preference to make permanent increased plutonium pit production at LANL. We also hope that DOE will live up to its commitments reaffirmed to Santa Clara Pueblo in our 2006 Accord as quoted here by addressing all the concerns we have expressed here with the Draft SPEIS in a manner that "recognizes and respects the continued existence of the Pueblo's values and culture in the exercise of its sovereignty."

Sincerely,

J. Michael Chavarria
Governor

Encl: (1) Map from LAHDRA Project showing Santa Clara Pueblo and LANL
(2) Map from Santa Clara Pueblo Office of Environmental Affairs entitled "Santa Clara Pueblo - Location to Los Alamos National Laboratory"

cc w/ encl:

Members of the Santa Clara Tribal Council
DOE Secretary Samuel Bodman
NNSA Administrator Thomas P. D'Angostino
DOE Deputy Assistant Secretary for Intergovernmental & External Affairs Steve Morello
CEQ Chairman James Connaughton
Senator Pete V. Domenici
Senator Jeff Bingaman
Representative Tom Udall
Representative Heather Wilson
Representative Steve Pearce
Governor Bill Richardson
New Mexico Environment Department Secretary Ron Curry
New Mexico Indian Affairs Department Secretary Alvin Warren
Joseph M. Chavarria
Jessica Aberly

Chelmowski, Bill

Page 1 of 1

PC_822

Levens, Matthew

From: Bill Chelmowski [bchelmowski@combuy.com]
Sent: Thursday, March 27, 2008 12:42 PM
To: Complex2030
Subject: Chemistry and Metallurgy Research Replacement (CMRR)

Bill Chelmowski
PO Box 167
Stanley, NM 87056-0167

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|15A I strongly support the administration's propcsal to build a plant to produce plutonium pits for nuclear weapons.

Congress foolishly blocked the Energy Department's last attempts to upgrade the arsenal by defunding the Reliable Replacement Warhead and last year's proposed mega-scale bomb plant, shamelessly putting partisian politics ahead of America's vital interests.

The CMRR project is a program that is vital to national security.

Sincerely,

Bill Chelmowski

Chestnut Hill, Sisters Of Saint Joseph
Page 1 of 1

PC_336

Public Comment to the Energy Department on the Plans for New Nuclear Weapons Development/Complex Transformation

Submitted by
Sisters of Saint Joseph of Chestnut Hill
Philadelphia, Pennsylvania

Submitted to
Theodore A. Wyka
Complex Transformation
SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

March 27, 2008

We, *Sisters of Saint Joseph of Chestnut Hill, Philadelphia, Pennsylvania* submit the following comments on the intent of the Energy Department's Plans for New Nuclear Weapons Development/Complex Transformation

1|9A
2|13A.1
In fidelity to the scriptures, the social teachings of our Catholic Church and our mission of unity as Sisters of Saint Joseph, we are compelled to express our opposition to the Bush Administration request in FY09 Budget for $10 million for the Reliable Replacement Warhead (RRW) program and $100 million to begin construction on a plant to produce plutonium pits for nuclear weapons. We believe that the proliferation of nuclear weapons and the construction of a new nuclear weapons complex do not ensure global security and represent a grave threat to stability and peace.

As a member congregation of the *Leadership Conference of Women Religious*, we have previously voiced our opposition to research, development, testing and use of nuclear weapons and diversion of funds from human services to the buildup of armaments. In a public statement in August, 2005, the 60th Anniversary of the atomic bombing of Hiroshima and Nagasaki, we voiced our affirmation of the 1983 *Peace Pastoral Letter of the U. S. Catholic Bishops* that

3|16A
states: "The whole world must summon the moral courage and technical means to say no to nuclear conflict." Most recently, in January 2007, we expressed opposition to Complex 2030.

4|1F
5|1J
We urge the Department of Energy to comply with the nuclear Non-Proliferation Treaty (NPF), to denuclearize U.S. arsenals, to plan cleanup of nuclear facilities and to exercise influence within the global community in efforts toward building a world that is free of nuclear weapons.

Chinlund, Caroline
Page 1 of 1

PC_1013

UNOFFICIAL BALLOT
NATIONAL REFERENDUM ON
THE FUTURE OF NUCLEAR WEAPONS

INSTRUCTIONS TO VOTERS: USE BLACK OR BLUE PEN ONLY. To vote on Measures A and B, fill in the oval after the word "Yes" or "No." You may add your own comments below.

SUBMIT COMPLETED BALLOT TO DOE/NNSA BY APRIL 30, 2008
Mail: Mr. Theodore Wyka, Complex Transformation SPEIS Document Manager; Office of Transformation, NA-10.1; U.S. Department of Energy/NNSA; 1000 Independence Ave., SW, Washington, DC 20585
Fax: (703) 931-9222 • **E-mail:** ComplexTransformation@nnsa.doe.gov

MEASURES SUBMITTED TO THE VOTERS
NATIONAL

1|9A
A Shall the United States proceed with a $150 billion plan to modernize its nuclear weapons research, development and manufacturing complex in order to replace its existing nuclear weapons and establish the capacity to build new types of nuclear weapons by the year 2030 ("Complex 2030")? YES ○ NO ●

2|1F
B Shall the United States, in compliance with its obligation under the Nuclear Non-Proliferation Treaty, commit to the global elimination of nuclear weapons no later than 2030 by initiating negotiations leading to conclusion of a verifiable treaty, under strict and effective international control? YES ● NO ○

3|1J
COMMENTS: I think the U.S. should take the lead in eliminating its nuclear stockpile and helping with the cost & eliminating the nuclear weapons of other nations where this would speed up the process. Any other course is terrifying to me, and immoral in the face of global stress.

NAME Caroline C. Chinlund
ADDRESS 445 WEST 19TH ST #9H-D
NEW YORK, N.Y.
SIGNATURE Caroline C. Chinlund **DATE** April 21 2008

Chinlund, Caroline

Page 1 of 1

PC_835

Levens, Matthew

From: caroline chinlund [cchinlund@nyc.rr.com]
Sent: Monday, April 07, 2008 11:22 PM
To: Complex2030
Subject: Message for Mr. Theodore A. Wyka

To: Mr. Theodore A. Wyka

Complex Transformation SPEIS Document Manager

Office of Transformation, NA-10-1

Department of Energy/NNSA

April 7, 2008

Dear Mr. Wyka,

I am writing in response to your invitation for public comment on the Transformation Proposal of the nuclear weapons complex.

1|16A 2|1F 3|1J 4|14O I do not believe adding nuclear weapons to our arsenal is a wise action. I do not wish our nation to violate the Non-Proliferation Treaty. This is a time when in our international relations we are insisting that other nations desist from attaining nuclear weapons capability. If we were to take the step of increasing our capacity, and therefore our readiness, to build nuclear weapons, we are telling the rest of the world that different policies apply to us as contrasted with our fellow nations.

Nuclear weapons are poisonous to people and the environment. We should not expand or transform our arsenal. In fact, we should get rid of it in an environmentally safe manner, as quickly as possible.

Yours sincerely,

Caroline C. Chinlund Ph.D

445 West 19th St. # PH-D

New York, N.Y. 10011

1

Chinn, Rick

Page 1 of 1

FEB. 26. 2008 10:50AM ANDERSON CO CHAMBER NO. 347 P. 1

PC_132

Rick Chinn
482-9259

CITY OF OAK RIDGE
CITY OF KNOXVILLE
CITY OF CLINTON
TOWN OF FARRAGUT
CITY OF KINGSTON
TENNESSEE

February 25, 2008

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Wyka:

We are writing in support of the Y-12 National Security Complex and its important mission within the National Nuclear Security Administration's (NNSA) Nuclear Weapons Complex.

1|15J The Y-12 National Security Complex has played an integral role in national and international security since its construction. As elected officials in the OakRidge/Knoxville region, our constituents comprise the majority of the Y-12 workforce, whose capability and expertise cannot be duplicated anywhere in the world.

2|5C.4; 3|5C The recently issued document entitled *The Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement* (SPEIS) presents several alternatives that are under consideration. The NNSA's preferred alternative is to establish "Distributed Centers of Excellence," which would support the continued, specialized uranium mission at Y-12 and allow the design for a new Uranium Processing Facility to proceed. We wholeheartedly support this alternative as it recognizes Y-12's unique capabilities while providing for a smaller, more secue site comprised of several, more efficient facilities.

We commend the NNSA for its efforts to engage thepublic in the plan to transform the Nuclear Weapons Complex into a safer, more cost-effective 21st Century institution. In this era of post-Cold War challenges, the United States can ill afford the loss of the significant national security investments made in Oak Ridge, Tennessee. We urge the NNSA to implement the preferred alternative, which we believe will provide a strong framework for national security intothe foreseeable future.

Rick Chinn, IT
Anderson County
Chamber of Commerce

Mayor Tom Beehan
City of Oak Ridge

Mayor Bill Haslam
City of Knoxville

Mayor Winfred Shoopman
City of Clinton

Mayor Eddy Ford
Town of Farragut

Mayor Troy Beets
City of Kingston

P.2

Feb 25 08 03:09p

Chisum, Warren
Page 1 of 2

Warren Chisum
STATE REPRESENTATIVE

COMMITTEES:
Appropriations, Chair
Energy Resources

PC_261

House of Representatives

Austin Office:
P.O. Box 2910
Austin, Texas 78768-2910
(512) 463-0736

District Office:
P.O. Box 2061
Pampa, Texas 79066-2061
(806) 665-3852

March 31, 2008

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Re: Complex Transformation Supplemental Programmatic Environmental Impact Statement (Complex Transformation SPEIS, DOE/EIS 0236-S4)

Dear Mr. Wyka:

Thank you for the opportunity to comment on this matter. The Department of Energy's Complex Transformation Supplemental Programmatic Environmental Impact Statement (SPEIS) is of great importance to the Amarillo community.

As an elected official representing the Amarillo area, I am proud of the Pantex Plant and its workers. Pantex has been a good neighbor, and I am fortunate to have it in the area. Accordingly, I strongly support Pantex continuing to maintain its current functions, advocate Pantex receiving the new functions and facilities listed in the preferred alternatives for the SPEIS, award Pantex any other new functions discussed in the SPEIS (such as the Consolidated Plutonium Center, Consolidated Uranium Center, Consolidated Nuclear Production Center, and/or the Consolidated Nuclear Center), and would urge DOE to reject any option that would result in the reduction or cessation of functions at Pantex.

1|15A

More specifically, I support Pantex remaining the Assembly/Disassembly/High Explosives (HE) production (formulation, processing and testing) and manufacturing (machining) center with all HE production and machining to support nuclear explosive package development and HE experiments up to 22 kg, and consolidating non-destructive surveillance operations at Pantex. I also support Pantex being established as the "Center of Excellence for Assembly/Disassembly" for nuclear weapons, and Pantex being established as the "Center of Excellence for High Explosives Production and Machining." I advocate Pantex receiving non-destructive weapon/pit surveillance with the existing Weapons Engineering and Testing Lab and the new Weapons Surveillance Facility, receiving updated HE machining and production facilities, and consolidating weapon and pit storage with a new underground storage facility located in Zone 12 of the plant.

Also, I believe that the addition of a Consolidated Plutonium Center, Consolidated Uranium Center, Consolidated Nuclear Production Center, and/or the Consolidated Nuclear Center (under the "Distributed Centers of Excellence" or "Consolidated Centers for Excellence" options) would be consistent with the historic disassembly and storage mission of the plant. Pantex currently stores more than 12,000

District 88: Armstrong, Bailey, Briscoe, Castro, Childress, Collingsworth, Donley, Gray, Hall, Hansford, Hemphill, Hutchinson, Lamb, Lipscomb, Oldham, Parmer, Roberts, Swisher, Wheeler

Chisum, Warren
Page 2 of 2

surplus pits and has a long history of handling pits in an excellent safety culture. The operation of most of these facilities will be an entirely new mission for any site ultimately selected. These facilities will require new construction, recruitment and training of additional personnel, and the creation of provisions for supporting infrastructure. DOE must essentially seek to establish a production capability that has never existed at any of the sites under consideration for these new facilities. It is my belief that Pantex's well-trained and unionized workforce makes it the safest and most cost effective site to undertake the responsibility of this new mission. Further, designation of Pantex would greatly reduce transportation of special nuclear materials (SNM), and its attendant costs and risks.

1|15A (cont)

I strongly believe that DOE should reject any option under the "Consolidated Centers for Excellence" option which may result in the cessation or reduction of weapons activities at Pantex.

As an elected representative, I am in tune with the sentiment of this area. I can say without hesitation that the Pantex plant enjoys tremendous public and bipartisan political support for existing and new missions and can ably perform those missions at the lowest additional costs to the taxpayers. DOE must have this strong, broad-based political support to accomplish anything relating to new missions dealing with SNM. DOE has the necessary support from local elected officials to help DOE's initiatives succeed.

Thank you for giving me the opportunity to illustrate why I believe that DOE's Record of Decision for this SPEIS should maintain current functions at Pantex, award the new functions and facilities listed in the preferred alternatives for the SPEIS, designate Pantex as the preferred site for other new functions discussed in the SPEIS (such as the Consolidated Plutonium Center, Consolidated Uranium Center, Consolidated Nuclear Production Center, and/or the Consolidated Nuclear Center), and omit Pantex from any site list from which such functions would be consolidated, relocated, or eliminated.

Sincerely,

Warren Chisum

Warren Chisum
State Representative, District 88

Chitton, Chalako
Page 1 of 1

PC_907

Mr. Theodore A. Wyka
Complex Transformation SPEIS Document Manager
U.S. Department of Energy, NA-10.1
1000 Independence Avenue SW
Washington, DC 20585

Your Additional Comments:

1|14E; 2|16A 3|14O We live in a dessert area and can not afford the water for a plant of this scale. I am also 100% aposed to the creation of more nuclear bombs and the polutions and sickness that they create.

Please print your name and address for DOE to respond to your comments

Chalako Chitton P.O. Box 584 Dixon NM 87527

Chitton, Chynna
Page 1 of 1

PC_906

Mr. Theodore A. Wyka
Complex Transformation SPEIS Document Manager
U.S. Department of Energy, NA-10.1
1000 Independence Avenue SW
Washington, DC 20585

Your Additional Comments:

Dear Mr. Wyka,

1|2E I am asking you to please honor our request for a ninety day extension on Public Comment.

My family & myself live down wind from Los Alamos. And the operations there concern us greatly. I speak on behalf of myself, my family, the greater community and all who want health and peace. We are opposed to more bomb production. Especially in our backyard

2|16A Thank you.

Please print your name and address for DOE to respond to your comments

Chynna Chitton Po Box 94 Dixon, NM 87527

Choi, Christina

Page 1 of 1

PC_1729

Levens, Matthew

From: Christina Choi [honeyfromaweed@gmail.com]
Sent: Sunday, March 30, 2008 2:25 AM
To: Complex2030
Subject: EIS comment

Mr. T. Wyka

1|1J **The Complex Transformation proposal reflects outdated thinking. The USA must get back on the track to pursuing a nuclear weapons-free world by adopting a new nuclear nonproliferation strategy.**

2|1B **Secondly, DOE is putting forth this proposal in the absence of a plan for re-examining the current role or quantity of these weapons.**

3|7J **Thirdly, DOE's main goal should be cleaning up the huge current nuclear waste instead of increasing it.**

Sincerely
Christina Choi
honeyfromaweed@gmail.com

Chow, Tiffany

Page 1 of 1

PC_1876

Levens, Matthew

From: Tiffany Chow [tdchow@ucla.edu]
Sent: Wednesday, April 02, 2008 5:20 PM
To: Complex2030
Subject: Budget Request for Nuclear Program

Tiffany Chow
836 Lilac Drive
Placentia, CA 92870-4728

April 2, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|2O My name is Tiffany Chow. I am a UCLA student studying and interning in Washington, DC for the spring quarter. I am currently working at Monterey Institute's Center for Nonproliferation Studies. Upon hearing about the Bush administrations proposal to build a new nuclear plant in New Mexico, I felt I must send a message to both the DOE and my Congresspeople about my strong disapproval of such a move.

2|16A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

I am also opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal.

3|1J Building this new plant would send a contradictory message to other countries, such as Iran, who may be seeking nuclear weapons. While the U.S. is asking others to forego developing nuclear arsenals, we are simultaneously trying to increase our own capacity to build new nuclear weapons.

The last thing we need is to send the wrong message about nuclear proliferation to the rest of the world.

Sincerely,

Tiffany Chow

Christ, Susan
Page 1 of 1

PC_1410

Levens, Matthew

From: juniperpinon@TaosNet.com
Sent: Tuesday, April 29, 2008 7:43 PM
To: Complex2030
Subject: No More Nuclear Billions!!!

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager, Office of Transformation, NA-10.1 U.S. Department of Energy/NNSA 1000 Independence Avenue, SW Washington, D.C. 20585

Dear Mr. Wyka,

The Citizens, Voters and families of New Mexico request adequate time to address questions regarding the proposed Complex Transformation to our Legislators. The "No Action Alternative" is the only option to follow for now.

As voters, neighbors, families and taxpayers, our political leaders must involved and have the voters voices heard in order to represent the State of New Mexico in such an important undertaking.

1|16A, 2|7O Congressional elections and outcomes will install new political landscapes in New Mexico as well as a President will write a new Nuclear Posture Review. Therefore, I support that it is not unwise for NNSA to embark upon a project of such magnitude at such an unstable socio-economic-political time. Let alone the fact that this Nation is already trillions in debt (four generations worth, or more).

The only "Action Alternative" that will benefit the well-being and safety of the citizens of New Mexico, and the one that the future generations (sane) would consider is "Fence to Fence Clean Up".
This is the "Action Alternative" requested by the New Mexico Environment Department. You must think clearly and respect the rights of "Life, Liberty, and Pursuit of Happiness" of our future generations by not supporting the proliferation of destructive weapons. You can't grow food with bombs.

Sincerely,

Susan D. Christ, Voter
San Cristobal, New Mexico

Christen, Carol
Page 1 of 1

PC_400

Levens, Matthew

From: Carol Christen [infrmtrx1@verizon.net]
Sent: Tuesday, February 19, 2008 4:35 PM
To: Complex2030
Subject: Absolutely Not! We Must Not Build Nuclear Bombs Period

Carol Christen
17240 NE Laughlin Rd
Yamhill, OR 97148-8413

February 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A Plutonium pits for nuclear weapons? Oh, no, never! This stuff is more than humans or life itself can deal with. Do you intend to kill the planet itself???? The new Age of Man--the Anthropocene has arrived to our deteriment anyway. Why make everything worse?

50 to 80 plutonium pits annually????

2|1J Building this new plant sends an insane and contradictory message to other countries. While the U.S. is asking others to forego developing nuclear arsenals, we are simultaneously trying to increase our own capacity to build new nuclear weapons. We, the People, did not agree to any of this.

3|8A Congress rebuked the Energy Department's last attempts to upgrade the arsenal by defunding the Reliable Replacement Warhead and last year's proposed mega-scale bomb plant. The CMRR project is another irresponsible new program that Congress should reject.

Sometimes, I wonder what planet I live on with money devalued and then plastered all over the planet in a wanton killing spree for resources which no one will use as they waste away from radiation poisoning. Think, for humanity's sake, for once.

4|1K Corporations and the Pentagon are out of control and so in the congress, not to mention the executive branch.

Sincerely,

Carol Christen
503 662 4982

1

Christian, B

Page 1 of 1

PC_1713

Levens, Matthew

From: B. Jane Christian [lnstr1147@hotmail.com]
Sent: Friday, March 28, 2008 6:35 PM
To: Complex2030
Subject: no new nulcear weapons

B. Jane Christian
1665 W 85th Ave Apt 103
Denver, CO 80260-5071

March 28, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|9A There is too much needed to be done in this country to waste money on nuclear weapons. And any country that is deluded enough to use nuclear should not be allowed to be s major voice in the world community. The fact that nation's use the fact that they have these killing machines shows an immature ability to govern and to interact with other nations on an adult level. It does not seem too grown up to use the argument that - mine are bigger
2|7O than yours - as opposed to the use of diplomacy as a means of interacting with other nations.

Sincerely,

B. Jane Christian
3034290309

1

Chu, Catharine

Page 1 of 1

PC_405

Levens, Matthew

From: Catharine Chu [jchu@twcny.rr.com]
Sent: Tuesday, February 19, 2008 11:15 PM
To: Complex2030
Subject: Against new CMRR plant for nuclear weapons production

Catharine Chu
117 Brookside Lane
Fayetteville, NY 13066-1509

February 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|1J; 2|16A I am very concerned that we are failing to keep our foreign policy on the track toward world stability. Please help deny the proposal to build a CMRR plant to produce plutonium pits and enable nuclear weapons to be produced. Iran and other countries will see us developing our nuclear weapons even as we urge others to avoid this practice. Congress should avoid upgrading our nuclear capability, as they have done in the past. They should not acquiesce in this irresponsible measure.

Yours sincerely,

Catharine Chu

1

Chung, Brenda
Page 1 of 2

Form posted from Windows Internet Explorer. Page 1 of 2

PC_507g

Buenaflor, Delight

From: Chung, Brenda [Brenda.Chung@thermofisher.com]
Sent: Wednesday, April 09, 2008 4:17 PM
To: DIV.Complex.Transformation
Subject: Form posted from Windows Internet Explorer.

Last Name=Chung
First Name=Brenda
Email Address=cbrenda@msn.com
Street Address=1703 E 1030 N
City=Logan
State=UT
ZIP Code=84341
Comments=I write in opposition to the "Complex Transformation" project.

1|1J While this program is proposed as a means of reducing the number of warheads stockpiled and consolidating the manufacturing process, the overhaul,really am ounts to very little weapons decommissioning and potentially recreates the nuclear arsenal to unprecedented levels.

2|1Q; 14O Although new technologies are alleged to circumvent full scale underground testing, the Nevada Test Site (NTS) would be kept open. Considering that the 828 underground tests conducted over the years: 1) have sometimes leaked to the surface, 2) have had an impact on aquifer water not fully understood, and 3) have contaminated Nevada's soils to the point where a leak could have disastrous consequence, this is not good public policy,

3|2E.2 And why have public hearings regarding the EIS been scheduled for residents of Nevada and other states but not of Utah? This raises many questions for Utahns given the long history of health related problems resulting from previous testing.

4|2A I also find it very troubling that the EIS has been conducted by the NNSA, which is 96 percent private contractors. Since this Complex Transformation project has a cursory price tag of over $150 billion and ensures NNSA plenty of work for many years to come, an EIS done by NNSA seems seriously compromised by potential conflict of interest to me.

5|5C.1 The most important reason given to justify the project is that the plutonium cores of existing warheads, most dating from the 1970s, were thought to have shelf lives of around 35 years. However, in 2007, the government advisory group JASON estimated pit lifetime at over 100 years, and Mr. Linton Brooks himself openly admits the validity of the 100 year estimate in a letter to the Armed Services Committee.

1|1J cont. Considering the demands the U.S. has placed on both North Korea and Iran, modernizing our own nuclear arsenals cannot be viewed as either consistent or just. Since the collapse of the USSR, Russia has been successfully cultivated as a quasi-ally. Talks with Russia since Reagan and Gorbachev, but prior to the Bush Administration, have aimed to gradually scale back the arsenals with an end goal of elimination. Resuming a nuclear program will be a step backwards and risks reactivating old uncertainties. No one wants a return to the Cold War.

6|13A.1 A strategy of maintaining an arsenal of thermonuclear bombs as a response to the threat of either non-state terrorism or the limited capabilities of "rogue nations" simply is not logical. Development of advanced nuclear capabilities will in no way deter anyone else from developing their own. In fact, security can only be decreased by a revitalized arms race that makes more of the building blocks for such bombs available to the world.

7|1K As stated in op. eds. in the Wall Street Journal coauthored by former Secretaries of State Henry Kissinger and Charles Shultz, former Secretary of Defense William Perry, and Senator Sam Nunn, the policy of thhis current administration is detrimental to achievements made by previous administrations. They stress that proliferation of nuclear weaponry in the modern world will only increase volatility. The strategy of Mutually Assured Destruction (MAD) was precarious enough when there were essentially two antagonists, but such a strategy today is

5/28/2008

Chung, Brenda
Page 2 of 2

Form posted from Windows Internet Explorer. Page 2 of 2

dramatically more dangerous.

PC_1470

Thank you.

5/28/2008

Ciernia, Robert

Page 1 of 1

PC_1583

Levens, Matthew

From: bobciernia@msn.com
Sent: Saturday, April 05, 2008 2:54 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

Call me crazy but I believe nuclear weapons put our species (not just our nation) at risk.

1|7M1 We have known for two generations that the widespread use of nuclear weapons would be a global catastrophe... global winter would kill billions, and could conceivably terminate our species.

2|2O My personal and national security rests in the entire world having enough to eat, a home to sleep in, schools for children to attend, and health to maintain life and limb. Nuclear weapons provide none of these things.

3|1J If we are to have a future, we must act in the present. As the first nation to use nuclear weapons, it is time for us to again get out front: this time, we must be the first to destroy our stockpile. Clearly, there is risk involved, but it a risk that does not pose a threat to our species.

2|2O (cont) Stop leading us into fear, and start providing a leadership based on hope! Nuclear weapons are a fear-based ideology and weaponry. Our country is better than that, and deserves a leadership better than that.

I ask that you include my comment as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project. Thank you.

Sincerely,
Robert Ciernia
41 Fareway Drive
Northfield, MN 55057

cc:
Representative John Kline
Senator Norm Coleman
Senator Amy Klobuchar

1

Cisneros, Alexis

Page 1 of 1

PC_354

Levens, Matthew

From: Alexis Cisneros [lexi_cristine@yahoo.com]
Sent: Monday, February 25, 2008 9:18 PM
To: Complex2030
Subject: No More Nuclear Weapons

Alexis Cisneros
2445 Monarch Dr. Unit 704
Laredo, TX 78045-6432

February 25, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|1J It is an absolute hypocrisy that our country exploits even the hint of nuclear capabilities in other countries as an eminent threat to national security and grounds for invasion, while our government is proposing plans for massive nuclear weapons proliferation.

2|16A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

CMRR is an irresponsible program and must be rejected. A nation that is supposed to be a leader in democracy, peace, and justice should be focused on nuclear disarmament.

Sincerely,

Alexis Cisneros

1

Citron, Kay
Page 1 of 1

PC_2151

Levens, Matthew

From: yogini_Kay@comcast.net
Sent: Wednesday, April 30, 2008 9:20 AM
To: Complex2030
Cc: a@domain.invalid
Subject: Just Say No to New Nukes!!

1|16A
NOW IS THE TIME TO STOP MAKING THE BOMB!!!!!
Please note that as a citizen of the United States of America, living in the State of Georgia, I am OPPOSED to restarting a Bomb Complex that would create more nuclear bombs for the planet. I am opposed to any form of nuclear bombs. I am disgusted with the fact

2|9H; 3|14O
that money I work hard for and money that is taken from my children's mouths, is spent on war and nuclear weapons. Please stop the creation of more nukes. Out planet can't take it anymore. Please find an alternative to this heinous act of creating war.

1|16A (Cont;) 4|9B
I would much prefer the budget being spent on new nuclear war heads and new nuclear production be spent on the clean up of the already existing nuclear waste. There are alternatives and NOW is the time to put our heads together as inhabitants of the same planet and find the way to safely live with the nuclear waste we have already created. It's as easy as: 1) Disarmament 2) Immobilization of current nuclear waste 3) Glassification of current nuclear waste.

Sincerely ,

Kay Citron
Lilburn, Georgia

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Citron, Roger
Page 1 of 1

PC_1840

Levens, Matthew

From: rcitron@krpartners.com
Sent: Sunday, April 06, 2008 5:06 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|15A
Though the Department of Energy should be congratulated for moving forward with plans to consolidate and reduce the facilities, workforce, and redundant capabilities within the nation's sprawling nuclear weapons complex, the emphasis on research, development, and

2|3A
manufacture of new types of nuclear weapons is unnecessary. The United States still maintains thousands of nuclear weapons and has thousands more in storage -- more than enough to maintain a reliable and credible nuclear deterrent for the foreseeable future. We simply do not need the capability to make more or newer nuclear weapons.

Sincerely,
roger citron
196 golden hill ave
haverhill, MA 01830

cc:
Senator Edward Kennedy
Senator John Kerry
Representative Niki Tsongas

1

Civiak, Bob
Page 1 of 1

PC_389

Levens, Matthew

From: Bob Civiak [civiak@wildblue.net]
Sent: Monday, March 03, 2008 3:24 PM
To: Complex2030
Subject: Documents cited in the Summary of the Draft SPEIS

Theodore A. Wyka

Complex Transformation SPEIS Documents Manager

Office of Transformation, NA-10.1

Dear Mr. Wyka,

I would like to know how I can get copies of five documents that are cited in the Summary to the Draft SPEIS on Complex Transformation.

1|2H I have addressed this e-mail to you, because the cover letter accompanying the Summary instructed readers to refer requests for additional information to you.

One of the documents in question are identified at the end of the Summary as SAIC 2007 and the other four are TechSource 2007 (a-d).

Please let me know what I need to do to get copies of those documents.

You may respond by e-mail or call me directly at the number below.

Regards,

Bob Civiak

603 448-5327

1

Claggett, Lorraine
Page 1 of 1

PC_610

Levens, Matthew

From: Lorraine Claggett [claggett@crosslink.net]
Sent: Saturday, February 23, 2008 6:37 PM
To: Complex2030
Subject: Proposed plutonium pits plant

Lorraine Claggett
27223 Enniskillen Rd
Easton, MD 21601-8449

February 23, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A; Under no circumstances do I want my country to begin developing new nuclear weapons. I oppose, in the strongest way, the present government proposal to build a plant to produce plutonium pits for nuclear weapons.
This would begin the the production of the first nuclear warhead since the end of the Cold War. When we are demanding that Iran not acquire nuclear weapons under threats of war with the nation if so, I certainly cannot support our country doing this. How can our administration be so transparently double-faced. The great project before us all is to
2|1J begin eliminating nuclear weapons - old and proposed. Congress has rejected recent attempts to begin new nuclear weapons. Please continue to do so.
War is not an answer to the threats of terrorism. Please, as my representative in government, do not support this plutonium pits plant.

Sincerely,

Lorraine Claggett

1

Clardy, Brad
Page 1 of 1

PC_1601

Levens, Matthew

From: electbradclardy@yahoo.com
Sent: Saturday, April 05, 2008 12:53 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

Our nuclear weapons program has made us and the world less safe.

1|16A We should be moving towards a nuclear free world and not looking for ways to "modernize" the global destruction industry.

2|1J People all over the world recognize our two-facedness when we call for disarmament from others yet can seem to ever manage even the tiniest of reductions for ourselves.

It is shameful.

1|16A (cont) The Complex Transformation proposals are definite steps in a decidely wrong direction.

Please include my comments.

Sincerely,
Brad Clardy
1901 17th
Lubbock, TX 79401

cc:
Senator Kay Hutchison
Senator John Cornyn
Representative Randy Neugebauer

1

Clark, Angela
Page 1 of 1

PC_364

Levens, Matthew

From: Angela Clark [angela@courtrecords.com]
Sent: Thursday, February 21, 2008 8:32 AM
To: Complex2030
Subject: We have nothing to fear but fear itself. Stop the fear Cyclone!!! Sissys!

Angela Clark
1314 Nashua
Houston, TX 77008-3746

February 21, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

Sincerely,

Angela Clark
832-256-7960

1

Clark, Brita
Page 1 of 2

PC_149

Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement—U.S. Department of Energy National Nuclear Security Administration

NEED FOR A NEW "PREFERRED ALTERNATIVE"
In scoping period, many printed out need for an alternative of more dismantling of bombs, not more building of bombs

Written Comment Form

Must be received on or before April 10, 2008.

1|16A We do not need more $ for nuclear weapons.
We need the leadership strength to honor our
2|1F 1970 promise to work for (complete global abolition
of nuclear weapons) implementation of NPT.
We cannot stop others from pursuing nuclear
3|1J ambitions by building more weapons of our own.
Nuclear weapons do not insure our security - they
4|13A impair it.
This is a national issue - not a local one!!
A least for nuclear weapons diminishes our
nation in the eyes of the world, while it does poisons
our citizens and drains crucial resources from
5|9B what will really make us strong like good healthcare,
education, and infrastructure.
It is wrong to build nuclear weapons.
1|16A They are an affront to humanity.
(cont) They are obscene.
They shame our nation.

Please use other side if more space is needed.

P.S. →

Comment forms may be mailed to:
Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Comment forms may be faxed to:
(703) 931-9222
or sent by electronic mail to:
complextransformation@nnsa.doe.gov

You may also submit comments through the project website which can be found at:
http://www.complextransformationspeis.com

Clark, Brita
Page 2 of 2

This is a National issue, not a local issue.

Why are all hearings held near NNSA sites?
People all over the USA should be given the
chance to speak out.
7|2E Sticking to NNSA sites "stacks the deck"
with people who have a vested interest in
keeping the weapons complex in business.
NNSA should at least hold hearings
in major cities throughout the nation - at
least 1 city in every state (2 in big states)

- BRITA LARSEN CLARK
157 SPICE HOLLOW
JOHNSON CITY, TN
37604
(423)979-7043
britac@comcast.net

8|7J I support Alternative II - transforming our nuclear
complex to dismantle weapons & clean
up the sites

Claus, Julia
Page 1 of 1

PC_2021

Levens, Matthew

From: Julia Ruth Claus [jtruth@taosnet.com]
Sent: Wednesday, April 30, 2008 5:29 PM
To: Complex2030
Subject: Please, at last, change the prevalent mind-focus of unceasing war.....

Dear NNSA,

1|10B; 2|16A As a caretaker of the land and a service provider of people, I am writing to tell you my deeply heartfelt feelings about expanding the nuclear weapons facility at LANL. I do not believe that stepping up the research and production and potential deployment of yet more-better and faster nuclear weapons is in the interest of ANYONE living on the planet today, not to mention in the benefit of us, the residents of New Mexico, where many of these nuclear research facilities exist, and especially those of us who live downwind of the Los Alamos facility.

We all experienced the anxiety and dread during that infamous forest fire so many years ago, when on clear enough days, all of us could see the black smoke rising from your beautiful mountain village there and surrounding forests, and on those days as well as the majority of not-so-good days, we were all breathing it- only imagining the myriad toxins that could be in that smoke considering where it was coming from.
I have lived in Taos for 23 plus years, and attended many hearings on the LANL operations, with ample time for statements from hundreds and hundreds of local NM residents, some of whom had actually lived in Los Alamos, a few who had worked at the government facility themselves.
There was talk of actual classified ads in the local paper during the 50's and 60's asking to know if any old timers knew in which arroyos LANL used to dump the waste back in the Old Days.

3|7F Upping the anti on the facility and its function is only asking for an accident to happen. We can always look forward to more fires, which are inevitable in our climate, and in communities where some still haven't learned about not burning trash and yard and ranch debris during windy seasons, "like we always used to do". And LANL doesn't exactly seem like a very well hidden target from the air, should that ever enter some lunatic's mind.

4|3A; 5|7F Thank you for allowing me to vent my feelings on the dangers of these issues and I dearly hope the decision makers will take into consideration our local communities' safety above ALL. We don't NEED any more bombs!!!!!!!!! Please, be wise and think about the inhabitants of our future earth- who happen to be our children and grandchildren. The government needs to begin seeing the folly in creating more weapons for more wars, and cease all this
6|9B immediately, putting the funds to use in a way that will prolong the lives of all the living and those yet to come- in an effort to create peaceful coexistence with all inhabitants of our beautiful Earth.

Truly yours,
Julia Ruth Claus
Licensed Massage Therapist and Artist

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Clayton, Jack
Page 1 of 2

Apr. 27. 2008 4:08PM No. 5590 P. 1/2

PC_17

From: Jack Ray Clayton
124 Tree Top Lane
Oliver Springs, TN 37840

To: Mr. Ted Wyka
NNSA
Fax: (703)931-9222

Subject: Comment on Complex Transformation

Clayton, Jack
Page 2 of 2

Feb. 27. 2008 4:08PM No. 5590 P. 2/2

February 27, 2008

From: Jack Ray Clayton (BWXT Y-12 LLC Employee)
To: Mr. Ted Wyka, NNSA
Subject: Comments on Complex Transformation

I, speaking as a baby boomer of the Post WWII era and an offspring of the early Oak Ridge community, (mother and father met and married during the beginning of The Oak Ridge Project), have strong feelings concerning this community and the work here which affects my family and the other people who live and work here.

I have been employed here for 28 years in which I have been involved in the different operations of work both directly and indirectly. In listening to the words of interest concerning the ideas for change, I feel that the facilities in Oak Ridge, including the Y-12 plant have borne the blunt of the work over the past years (60+) and when someone decides that it is time for (new facilities) or a (smaller, more efficient facility) are we going to agree with those who say it can be done better or more securely elsewhere? Absolutely not!

1|15A

In the past 7 years since 9-11-2001, I've noticed an improved security awareness at the Y-12 plant and feel strongly that there is no place on earth that this work can or should be done and our nation's nuclear stockpile securely stored than Oak Ridge, where it all began! This is where it should stay and be secure until.....

Clementi, Kathleen
Page 1 of 1

PC_579

Levens, Matthew

From: Kathleen Clementi [kclementi@yahoo.com]
Sent: Monday, March 03, 2008 11:16 AM
To: Complex2030
Subject: Oppose building plants to produce plutonium

Kathleen Clementi
PO Box 1230
Dona Ana, NM 88032-1230

March 3, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|1J;
2|16A

I am opposed to the building of plants to produce plutonium for nuclear weapons. First the U.S. has more nuclear weapons than any other country in the world. Yet we sanction any other countries from building their own, how hypocritical.

Nuclear weapons should be banned world wide. They are weapons of mass destruction. The U.S. should stand as the world leader in banning nuclear weapons by doing away with our own weapons of mass destruction. I believe with this act the rest of the world would follow

s.

Sincerely,

Kathleen Clementi
505-805-2062

1

Click, Jeff
Page 1 of 1

PC_2043

Buenaflor, Delight

From: jclick@lanl.gov
Sent: Monday, April 14, 2008 12:25 PM
To: DIV.Complex.Transformation
Subject: Comment on NNSA Complex Transformation SPEIS

After reviewing the Draft Complex Transformation SPEIS I have a number of comments.

1|10B
2|10C
Despite the stated goal to "make the U.S. nuclear weapons complex (Complex) smaller, and more responsive, efficient, and secure", there still appears to be significant redundancy between LANL and LLNL. Aside from Pit Production and PU research, it is not clear what the differences will be (if any) in the roles these two facilities will play in the complex. Both have the following common description, "research, design, and development of nuclear weapons; designs and tests advanced technology concepts; provides safety, security, and reliability assessments and certification of stockpile weapons; conducts plutonium and tritium R&D, hydrotesting, HE R&D, and environmental testing".

In addition, there also appears to be considerable redundancy in the performance of HE R&D. These apparent redundancies appear to me to be incompatible with the stated goal of a smaller and more efficient complex.

Thank you,
Jeff Click
2204 A 48th St
Los Alamos, NM 87544
jclick@lanl.gov

Clifford, Rita
Page 1 of 1

PC_1845

Levens, Matthew

From: Rita Clifford [rclifford13@hotmail.com]
Sent: Friday, March 28, 2008 11:28 AM
To: Complex2030
Subject: CMRR Project

Rita Clifford
2 Coralburst Lane
Scarborough, ME 04074-7154

March 28, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A
I am strongly opposed to this administration's plan to produce plutonium pits for nuclear weapons. I am also against any steps that will make it easier for the U. S. to rebuild its nuclear arsenal.

2|1F
It is important that our country model for other nations the importance of foregoing nuclear weapons instead of increasing our own nuclear capacity.

1|16A (cont.)
The Chemistry and Metallurgy Research Replacement project is irresponsible and should be rejected.

Sincerely,

Rita Clifford
207 883-0573

1

Clown, Wippie
Page 1 of 1

PC_1027

I'm Wippie, Wippie, Wippie the radioactive clown, that's me.

Ladies and Gentlemen, Boys and Girls, I am so excited about this wonderful new chance to absorb some more radiation. I am the founding and only member of Santa Feans For A Radioactive Tomorrow. Our motto is "Mutation is Evolution", and you are certainly providing us, our children, our great grandchildren, their great grandchildren, their great, great grandchildren, well you get the idea, for 10,000 years ... You're providing all of us with the opportunity to Mutate and Evolve. Every member of Santa Feans For A Radioactive Tomorrow is excited. 1|14O

I brought this bomb sound pen with me for emphasize some points. The chance for more radiation certainly deserves a bomb sound. (Pen) Darn, my pen doesn't seem to be working.

You know, a lot of people in this room seem to be scared of this facility. They think because of the utterly deplorable safety record at Los Alamos and of the nuclear industry in general that you'll accidentally release plutonium. Well of course you will. They just don't get the big picture like you and I do. They don't see that this provides them and the next 500 generations the chance to mutate and evolve. I ask you ... who doesn't need an extra set of hands sometimes. Everyone knows that two heads are better than one. I don't like to brag, but I'm working on a very long tail, with a nice fluffy end. Practical and very exciting with the ladies, Ooh la la, votre queue est (kree e) magnifique". Mutation really is Evolution. (Pen) Darn, that really doesn't sound like a nuclear explosion.

First you guys put radioactive waste in a collapsing salt mine, above a water table at WIPP. Now a plutonium manufacturing facility 20 miles from a city. You all come up with the craziest, wackiest ideas. And I thought I was the clown. (Pen) Crazy pen. 2|14M

There's a lot of talk about sustainability these days. Them Bechtel boys is pretty smart. First they get paid to make a radioactive mess, then they get paid to clean it up. That's a sustainable business, not a bunch of solar panels. (Pen)

Well, to conclude, I gotta commend you for sitting there all night and pretending you're paying attention to me or anyone else, or that you even really care at all. Us taxpayers are definitely getting our money's worth. You almost had me fooled.

Folks ... what's more fun than a barrel of monkeys? A barrel of plutonium pits. (pen) 3|16A

Why did the two plutonium pits fall in love? Because the melted down each others hearts.

Thank you again for the chance to mutate and evolve. (Pen)

Santa Fe, NM

Coghlan, Jay
Page 1 of 21

PC_382

nuclear watch new mexico

Comments on the draft "Complex Transformation" SPEIS

April 30, 2008

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA 1000 Independence Avenue, SW
Washington, D.C. 20585
E-mail: ComplexTransformation@nnsa.doe.gov
Fax: 1-703-931-9222

Dear Mr. Theodore A. Wyka,

Nuclear Watch New Mexico (NWNM) hereby submit these comments on the draft "Complex Transformation Supplemental Programmatic Environmental Impact Statement" (SPEIS) to the National Nuclear Security Administration (NNSA), the semi-autonomous nuclear weapons agency within the Department of Energy. Any quotes from the SPEIS and/or its cited reference documents in these comments are italicized, followed by its page number(s) in plain text.

The SPEIS Inadequately Justifies the Purpose and Need for Complex Transformation; The Entire Proposal Is Premature and Skews Consideration Of All Reasonable Alternatives 1|3A1

NNSA now proposes to continue the transformation of the Complex by further consolidating operations, which could result in the relocation of activities among sites. P. S-1. Operations may be consolidated somewhat under the NNSA's proposal, but the SPEIS completely fails to consider the physical consolidation of sites. Notwithstanding the SPEIS's worthy effort to consolidate special nuclear materials (SNM) operations, the whole proposal still evades Congressional direction, as exemplified in the following Senate Armed Services Committee declaration: 1|3A1 (cont.)

> The NNSA has initiated the Complex 2030 study to review the nuclear weapons complex and decide on the design for the complex of the future. The committee is troubled by the scope and timing of the study and the options under consideration. The study does not include any options that would significantly reduce the size of the complex or that would consolidate operations and NNSA sites. The committee urges the NNSA to expand the scope of the Complex 2030 study to look at site consolidation, including the possibility of closing NNSA sites that are surplus to mission needs.[1]

[1] Report 110–77, National Defense Authorization Act For Fiscal Year 2008, P. 619 (or PDF p. 641).

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"Complex 2030" was the predecessor to NNSA's current "Complex Transformation" proposal,[2] to which the Senate Armed Services Committee's remarks remain highly relevant as well. Despite that, NNSA proposes to consolidate from its present eight active major nuclear weapons research and production sites to… its eight active major sites.[3] Perhaps the most egregious example by omission is the fate of the Kansas City Plant, discussed in its own section of our comments below.

2|12.0

This lack of consideration of site consolidation pervades the entire proposal,[4] both on the production and R&D sides, with, for example, *NNSA does not currently consider it reasonable to propose closure of any of the NNSA laboratories (see also Section 3.1.4).* [Note: There is no Section 3.1.4 in the SPEIS.] *However, such consolidation could be proposed in the future depending upon future national security requirements.* P. 2-17. This is despite the fact that the Galvin Commission specifically considered closing the Lawrence Livermore National Laboratory (LLNL) in 1994-1995, which it ultimately recommended against. However, we think that consideration of consolidating R&D national labs is even more reasonable now for a variety of reasons.[5]

3|7A7

But here we make a fundamental, threshold point regarding the SPEIS' comment that *such consolidation could be proposed in the future depending upon future national security requirements.* In fact, future national security requirements, which the NNSA nuclear weapons complex is required to support, are quite likely to change.

Time and again this draft SPEIS repeatedly states that "Complex Transformation," and in particular expanded plutonium pit "trigger" production, is driven by President Bush's 2001 Nuclear Posture Review (NPR). However, Congress has specifically required the incoming President to prepare a new Review, saying, "It should be used as a basis for establishing future United States arms control objectives and negotiating positions." The FY 2008 Defense Authorization Act, signed into law this January, also required a bi-partisan commission to recommend by this December the number of nuclear weapons really needed and the related appropriate size and composition of the nuclear weapons complex. The House Armed Services Committee specifically noted that following Bush's 2001 NPR "there is an urgent need for a

[2] In our view, NNSA switched from "Complex 2030" to "Complex Transformation" because of Congressional rejection of FY 2008 funding for new design nuclear weapons, the so-called Reliable Replacement Warheads (previously NNSA's proclaimed "enabler' for transforming the complex), and Congressional rejection of FY 2008 funding for a "Consolidated Plutonium Center" capable of producing 125 plutonium pits per year for RRW.

[3] To be fair, NNSA does say, but does not yet guarantee, that it will lower the "footprint" of each individual site.

[4] With the exception of possibly closing down the Tonapah Test Range for gravity bomb flight-testing, only to have those activities transferred to the Nevada Test Site or the Department of Defense's White Sands Missile Range.

[5] A few quick selected reasons are: Congressional rejection of FY08 funding for new designs under the so-called Reliable Replacement Warheads (LLNL was awarded the first design selection), said rejection likely to be repeated for FY 2009;related, a key November 2002 conclusion by independent experts that the all crucial nuclear weapons components - - the plutonium pit "triggers" - - have reliable lifetimes of a century or more; the NNSA's commitment to remove Security Category I/II special nuclear materials from Livermore by 2012; the overall need of this nation to demonstrate greater adherence to the 1970 NonProliferation Treaty's obligation to disarm nuclear weapons stockpiles; and clear savings for the taxpayer.

debate over the role of nuclear weapons in U.S. strategic posture." In short, it makes no sense for complex transformation, including expanded pit production, to proceed now before a new Nuclear Posture Review, and NNSA's "transformation" proposal should be withdrawn until then. Instead, the agency is pushing hard to achieve its political aims before the Bush clock runs out.

4|1C

In our view, the draft SPEIS is replete with predeterminations made in the haste of the NNSA's political process to get as far as it can while President Bush is still in office. As an example, the SPEIS declares in response to public scoping comment:

> *However, unless and until there are significant changes in national security policy, NNSA is required to design, produce, and maintain the nuclear weapons stockpile pursuant to requirements established by the President and funded by Congress. In conjunction with the 2001 NPR, President Bush set an objective of "…achieving a credible nuclear deterrent with the lowest-possible number of nuclear warheads consistent with our national security needs…" In recognition of this objective and the reduction in the U.S. stockpile since the end of the Cold War, this SPEIS qualitatively evaluates changes in the alternatives that would be appropriate if the stockpile is reduced below the level called for by the Moscow Treaty. Accordingly, this SPEIS analyzes alternatives that satisfy requirements of the existing national security policy framework, as well as a capability-based alternative that, while not capable of meeting current requirements, could meet those requirements if the stockpile were reduced below the level called for by the Moscow Treaty.* P. S-8.

Again, there is a significant possibility of significant changes in national security policy, specifically nuclear weapons policies, given that Congress has already required two different venues for review of those policies. Notably, both are to be completed after the November presidential elections, pointing to the inappropriateness of making Complex Transformation decisions before then. Concerning the "lowest-possible number of nuclear warheads consistent with our national security needs," that has yet to be reviewed and determined by the incoming Administration. We don't believe that the Moscow Treaty's level of 1,700 to 2,200 nuclear weapons makes that determination, given that those are deployed weapons only. The Treaty fails to address tactical nuclear weapons, the even larger amounts of strategic weapons held in reserve, fails to mandate irreversible dismantlements, and fails to make any cuts permanent.

5|1J

With respect to *this SPEIS qualitatively evaluates changes in the alternatives that would be appropriate if the stockpile is reduced below the level called for by the Moscow Treaty,* the SPEIS should simply not make those determinations (perhaps better called predeterminations), and the NNSA should withdraw this SPEIS. Those determinations should and will be the job of the incoming Administration. Nor is the draft SPEIS' range of alternatives necessarily appropriate even if the U.S. nuclear weapons stockpile is reduced below Moscow Treaty levels.

4|1C (cont.)

In our view, the clearest example of this is that all the draft SPEIS' formal alternatives, except the so-called "No-Action Alternative," [6] assume that the Los Alamos National Laboratory's (LANL's) level of pit production is raised from 20 to at least 50 pits per year. The lack of need

[6] As NNSA has stated that its preferred alternative is the production of 50 to 80 pits per year, and that the No Action Alternative is used as a comparative baseline for the purpose of NEPA analyses, we believe it can be disregarded for the purposes of this discussion.

for even that level of production is discussed below in a separate comment section, but is incorporated here as yet more evidence of the lack of adequately stated purpose and need for NNSA's whole Complex Transformation proposal as currently composed.

Here we dwell upon the "Capability-Based Alternative," described as having been *developed to analyze the potential environmental impacts associated with operation of a Complex that would support stockpiles smaller than required to meet anticipated future national security needs.* P. S-51. That is highly prejudicial statement that leads inevitably to this Alternative's pre-emptive rejection by NNSA. It reinforces our point that Complex Transformation must await the incoming Administration, which is already required to review exactly what our nuclear weapons national security needs will be.

6|5C1

We also find it telling that this Alternative is the least expensive to taxpayers and the least environmentally damaging (with the exception of the *pro forma* No Action Alternative), but again it is in effect summarily rejected under the requirements of the outgoing Administration. Nevertheless, even the Capability-Based Alternative assumes the expansion of pit production at LANL from 20 to 50 pits per year, which again is not necessary, and demonstrative of prejudicial action.

Plutonium pit production no doubt receives the most public attention. But the other side of the production coin is operations involving highly enriched uranium (HEU), particularly Canned Subassemblies (CSAs). Under NNSA's preferred "Distributed Centers of Excellence" (DCE) Alternative for HEU operations:

7|5C8

> *Y-12 would continue as the uranium center providing component and canned subassembly production, surveillance and dismantlement. Independent of this SPEIS, NNSA is completing construction of the HEUMF [HEU Materials Facility] and consolidating HEU storage in that facility; and can proceed with the preliminary design of a UPF [Uranium Processing Facility] that could be located at any of the sites under consideration in this SPEIS.* P. S-66.

Other than some ambiguous information regarding projected transportation shipments of CSAs, the SPEIS remains silent on what future production rates might or should be for CSAs, in contrast to specifically stated rates of differing plutonium pit production. However, the SPEIS's supporting "business case" for special nuclear materials consolidation[7] lists Y-12's CSA manufacturing and assembly at "200+" per year[8]. The SNM business case also assumes the startup of operations of a Uranium Processing Facility at Y-12 by 2018[9]. First, the final SPEIS should make clear why or why not 200+ CSAs are needed.

8|5C2

With respect to the Uranium Processing Facility (UPF), again its construction and operation is assumed under the preferred DCE alternative, or an "UPF-like" facility for the Consolidated Uranium Center Alternative (we note again that No-Action is basically a NEPA straw man for

[7] Formally known as the *Independent Business Case Analysis of Consolidation Options for the Defense Programs SNM and Weapons Programs*, TechSource, Inc., Santa Fe, New Mexico, December 2007, http://www.complextransformationspeis.com/RM_276%20-%20TechSource%202007a.pdf.
[8] SNM business case, p. 3-1.
[9] Ibid, p. 4-12.

comparative baseline purposes, and the Capability-Based Alternative has already been declared to not meet current national security needs, and therefore will be rejected). What is really needed is analytical justification that 200+ CSAs are needed annually, and judgments as to whether a UPF really has to be built.

Why can't, for example, some of the floor space of the HEUMF be used for claimed needed CSA manufacturing and assembly and disassembly, even if this means downblending some HEU stock so as to create more floor space (and in any event downblending of the immense HEU inventory would have permanent security benefits)? In part it is argued that the UPF must be built in order to lower Y-12's overall high security footprint, and therefore save money. However, the HEUMF is already within Y-12's planned consolidated high security footprint, and it does not then automatically follow that the UPF has to be built if part of the HEUMF could be used for CSAs. Further, substantial sums of taxpayers' money could be saved, as the UPF's initial estimated cost of $1 billion has already mushroomed to $3.5 billion.[10]

8|5C2 (cont.); 5E9|

As an example of NNSA's failure to posit a range of all reasonable alternatives for serious consideration, the agency failed to propose an alternative that could be described as a "Responsible Curatorship Alternative" that conforms to both the U.S. Constitution and the international NonProliferation Treaty (NPT). Article VI of the U.S. Constitution mandates that "all treaties made, or which shall be made, under the Authority of the United States, shall be the supreme Law of the Land." NPT Article VI, effective since 1970, requires its signatories (including the U.S.) to "pursue negotiations in good faith on effective measures relating to cessation of the nuclear arms race at an early date and to nuclear disarmament..." Complex Transformation clearly does not move the U.S. in that required direction, but instead seeks to indefinitely postpone required disarmament, and even explicitly allow for the development and production of even new-design nuclear weapons.

10|5H2

In sum, we view such a curatorship alternative as:

- Complying with the U.S. Constitution, and therefore by definition an imminently reasonable alternative. Further, it should therefore be considered in all reasonable proposals for the future of the nuclear weapons complex.
- It then follows that NNSA must analyze a Responsible Curatorship Alternative (or the roughly equivalent) that safely maintains the nuclear stockpile while it awaits eventual dismantlement under the NPT.
- Further, NNSA should consider and analyze how a Responsible Curatorship Alternative or the equivalent would encourage declared nuclear weapons states toward the NPT's mandated goal of nuclear disarmament, and encourage non-signatory nuclear weapons states to join the NPT, thereby significantly enhancing global and national security.

10|5H2 (cont)

Instead, while considering and then quickly rejecting this curatorship alternative, the SPEIS states:

[10] "Proposed Y-12 facility could cost $3.5 billion, New cost figures dwarf previous estimate," Frank Munger, August 22, 2007 http://www.knoxnews.com/news/2007/Aug/22/proposed-y-12-facility-could-cost-35-billion/

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10|5H2 (cont.)

> *While NNSA acknowledges that aspects of curatorship are an accurate description of how the SSP [Stockpile Stewardship Program] works, NNSA eliminated curatorship from detailed study as a stand-alone alternative because it does not define a programmatic alternative distinctly different from the range of alternatives analyzed in this SPEIS.* P. S-57.

The SPEIS then later makes the claim for a number of reasons that, *In summary, a curatorship alternative does not define a programmatic alternative outside the range of alternatives evaluated in this SPEIS*. P. 3-129. We agree that, in part, this is true. However, it is highly dissembling to imply that that is the whole truth, since the agenda of "Complex Transformation" goes so far beyond just a simple curatorship approach to the nuclear stockpile.

4|1C (cont.)

Again, we go back to the repeated acknowledgements that NNSA's current Complex Transformation proposal is driven by the Bush Administration's 2001 Nuclear Posture Review (NPR). Amongst other things, that Review called for new-design nuclear weapons and expanded plutonium pit production. As previously and repeatedly stated in these comments, Congress has already required the incoming Administration to complete a new Nuclear Posture Review. For this draft SPEIS to categorically reject in advance a simple curatorship approach to maintaining the nuclear weapons stockpile while it awaits dismantlement is premature and inappropriate. To echo another previous point, the SPEIS should simply be withdrawn and await reformulation and re-submittal by the next Administration.

4|1C (cont.)

Related to the above, we believe that the next Administration, depending on who the President is, may likely place a high priority on future rates of nuclear warhead dismantlements. NNSA currently claims to have rapidly accelerated dismantlements, but this may be a specious claim if the present rates of dismantlements are relatively low to begin with. For example, if dismantlements are currently 100 warheads or below per year, what does it really mean to double dismantlements to 200 annually when there are nearly an estimate 10,000 nuclear warheads in the total stockpile (including all tactical and strategic nuclear weapons both deployed and held in reserve)?

11|7A4

The SPEIS is grossly deficient and is not being forthcoming about future accelerated dismantlement rates, which as is reasonable to assume, could be major national security priority. In contrast, it is very clear that the SPEIS is predominantly and overwhelmingly about future production rates for refurbished nuclear weapons, and even more significantly, ultimately about the production of new-design nuclear weapons (see our comment section of why expanded plutonium pit production is not needed below), to the detriment of accelerated dismantlements.

12|9E1

As a case in point, we find it telling that one of the SPEIS's most important supporting reference documents, "TechSource 2007a" (the special nuclear materials "business case") states that the mega-nuclear weapons production facility considered under the SPEIS (the "Consolidated Nuclear Production Center" (CNPC)) will only "have a nominal capacity to dismantle 200

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13|9E1

weapons" per year.[11] This definitely smacks of a gross determination by the present Complex Transformation proposal to heavily favor nuclear weapons production, including new-designs, over urgently needed dismantlements. At the contemplated rate of 200 dismantlements per year for the CNPC, which if built would be at great taxpayers' expense, then we have a half-century to go before it could dismantle all existing U.S. nuclear weapons, even assuming no new nuclear weapons production.

We respectfully suggest that kind of prioritization is not in the nation's or the world's best interests.

14|3A

To conclude this section of our comments, we reiterate that the SPEIS does not adequately define the purpose and need for NNSA's current Complex Transformation proposal. Further, hasty implementation of the present proposal is a political rush job before the November presidential elections and constricts and arbitrarily bounds discussion of all reasonable alternatives. This SPEIS should be simply withdrawn and reformulated for submission once the new required reviews of U.S. nuclear weapons policies are completed under the next President.

The SPEIS Must Give Projected Costs of Complex Transformation

We assume that NNSA will turn a deaf ear to what we believe is our cogent argument that the SPEIS should not proceed and be withdrawn until a later date. Given that likely rejection, we go on to argue that NNSA should give projected costs for Complex Transformation.

13|9E1 (cont.)

As a statutory matter, normally we would agree that the National Environmental Policy Act (NEPA) does not require federal agencies to give projected estimated costs for their "major federal actions." However, we believe that the NNSA's currently proposed "Complex Transformation" proposal is different in that the agency has chosen to make claimed cost savings integral to its claimed purpose and need. NNSA has, in fact, pitched potential cost savings to both Congress and the public as a central rationale for Complex Transformation. However, any supporting evidence for cost savings is very, very thin. For example, in an April 15, 2008 meeting, upon questioning the NNSA head of the Office of Transformation admitted to Nuclear Watch New Mexico and others that the agency has not compiled the estimated costs of Complex Transformation. NNSA cannot have it both ways - - it cannot claim that Complex Transformation will save taxpayers money if it has not calculated the costs for Complex Transformation.

For the record, a few selected cost-saving claims that NNSA has made about Complex Transformation follow:

"Complex Transformation – Vision of the Future Complex. The future Nuclear Weapons Complex (the Complex) would be smaller, safer and less expensive." [12]

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[11] *Independent Business Case Analysis of Consolidation Options for the Defense Programs SNM and Weapons Programs*, TechSource, Inc., Santa Fe, New Mexico, December 2007, p. 4-12, http://www.complextransformationspeis.com/RM_276%20-%20TechSource%202007a.pdf

[12] NNSA FY09 Congressional Budget Request (CBR), Volume 1, p. 74.

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"Saying that the nation's aging Cold War-era nuclear weapons complex is too big and too costly, the National Nuclear Security Administration's (NNSA) top official announced its proposal to create a nuclear weapons infrastructure that is smaller, safer, more secure and more cost effective… Today's nuclear weapons complex needs to move from the outdated, Cold War complex into one that is smaller, safer, more secure, and less expensive…" D'Agostino said. "I believe this can be done within our existing budget." [13]

"Our goal is to transform the large, costly and inefficient Cold War nuclear weapons complex that cannot meet the full production requirements of our customer into an integrated, modern and cost effective nuclear security enterprise." [14]

13|9E1 (cont.)

NNSA's proposed approach to continuing transformation of the Complex builds on existing programs and management structures, so that transformation can be accomplished within currently projected funding levels as much as practicable. The cost and potential environmental impacts of the alternative actions in this SPEIS are primarily associated with the potential construction of new but smaller replacement nuclear facilities. Thus, a wide range of alternative configurations for these nuclear facilities is being evaluated from an economic perspective. NNSA has completed economic studies of the alternatives (TechSource 2007a, 2007b, 2007c, 2007d). P. S-4, parenthesis in the original.

S.2 Purpose and Need for Agency Action
… The underlying purpose and need addressed in this SPEIS is to:…
• Create a responsive nuclear weapons infrastructure that is cost-effective… P. S-12:

However, one of the SPEIS's supporting documents cited above, "TechSource 2007a" (the special nuclear materials business case), appears to specifically contradict NNSA's claimed cost-savings though Complex Transformation. The business case said that *Transition will require a campaign mentality and a long, consistent funding horizon. The cash flow figures demonstrate that significant increases from baseline funding will be required to modernize and consolidate the SNM production complex.*[15] This is significant given that SNM consolidation is likely to be by far the most expensive element of proposed Complex Transformation. Yet the "funding horizon," which we also interpret to be also "baseline funding," even by NNSA's projections is slated to remain relatively flat, not even taking into account likely increasing federal budget constraints. All of this flies in the face of NNSA claims that Complex Transformation can take place within its existing projected budgets.

Finally, we note that contrary to its claimed cost-savings that NNSA has actually chosen the most expensive alternative as its preferred alternative for plutonium pit production, that is the "Consolidated Plutonium Center" (CPC). As the SNM business case notes, *The CPC options*

[13] "D'Agostino gives vision of the nuclear weapons complex of the future," December 18, 2007, http://www.nnsa.doe.gov/docs/newsreleases/2007/PR_2007-12-18_NA-07-64.htm
[14] Page 3, http://www.nnsa.doe.gov/docs/congressional/2008/2008-03-12_Smolen_Tobey_HASC_FY09_Budget_Testimony.pdf
[15] *Independent Business Case Analysis of Consolidation Options for the Defense Programs SNM and Weapons Programs*, TechSource, Inc., Santa Fe, New Mexico, December 2007, .p. xi, http://www.complextransformationspeis.com/RM_276%20-%20TechSource%202007a.pdf

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generally have the highest NPV [net present value] in 2060 because they do not consolidate major functions or close major facilities and *Building a CPC does not consolidate operations, so it generates no security savings.*[16] The latter is contrary to one of Congress' primary motivations for SNM consolidation in order to save long-term security costs.

13|9E1 (cont.)

In short, because NNSA has chosen to make cost-savings a central element for justifying Complex Transformation's purpose and need, as pitched to both Congress and the public, NNSA must then calculate and state projected cost for Complex Transformation in this SPEIS.

There Is No Need for Expanded Plutonium Pit Production Under Complex Transformation

6|5C1 (cont)

Expanded production to the preferred 50/80 alternative, and even LANL's currently sanctioned rate of 20 pits per year, is unnecessary, expensive, environmentally risky, and provocative when we tell other countries they can't have nuclear weapons.

Rocky Flats was producing pits for the W88, a sub-launched missile warhead 30 times more powerful than the Nagasaki bomb, when the Plant was abruptly shut down by 1989 FBI raid investigating environmental crimes. DOE's opening argument in the first half of the 1990's for reestablishing production was that it had no spare W88 pits to tear down in annual checkups for possible defects. However, only one pit per weapon type is destructively analyzed every year.

15|5C3

Despite that, last year LANL produced eleven W88 pits for prompt shipment to the Pantex Plant near Amarillo, TX, the site of final nuclear weapons assembly. The Moscow Treaty requires that deployed nuclear weapons be slashed to 2,200 or under by 2013. Why can't the number of deployed W88s -- estimated in the mid-300's -- be reduced, thereby making spare pits available for annual "stockpile stewardship" analysis? Why manufacture them at all?

LANL plans to re-develop pit manufacturing capability for most other nuclear weapons in the planned future stockpile (up to 7 different nuclear weapons "systems" depending on future decisions). As to these other pit types, the Pantex Plant is specifically authorized to "reuse" up to 350 existing pits per year. Although this is not widely known, it effectively renders moot any need to produce any pits for other than the W88 (which we don't need anyway). As it is, Pantex already stores at least 12,000 existing pits, and the Plant itself boasts that pit "reuse" is far less expensive and environmentally damaging than new pit production.

6|5C1 (cont.)

But NNSA argues in the Complex Transformation SPEIS that pit reuse cannot be a substitute for the production of new pits, an argument that we find largely specious. First, existing pits for the planned stockpile are far more reliable than previously believed. The draft SPEIS declared *Pit reuse can limit the ability to improve the performance margin of the primary, which contributes to longer-term reliability.* P. 2-13. But senior experts, including prominent members of JASON, have argued for years that the easiest way to ensure increased reliability was to add or more frequently replenish the weapons with tritium (a radioactive gas used to "boost" nuclear weapons), which they described as a routine and straightforward operation. As far as we can discern, the SPEIS completely omits this reliability enhancement alternative.

[16] Ibid, pp. viii and x.

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Pit reuse can limit the ability to upgrade the intrinsic safety and security features of a weapon. P. 2-13. But the safety and security of U.S. nuclear weapons have far more to do with the conduct of operations involving nuclear weapons. In that vein, there were two recent very serious failures by the Department of Defense, and therefore improvement in operations should be focused on instead of new weapons (which is essentially what NNSA still seeks when it proposes to replace the conventional high explosives of some weapons types with insensitive high explosives). Further, the security of U.S. nuclear weapons relies upon "guards, guns and gates" which must always be rigorously maintained, rather than the inherent designs of the weapons. But most of all, it would be a steep stockpile reduction, a focus on strongly accelerated rates of dismantlements, and a radical shrinking of the nuclear weapons complex that would most directly enhance U.S. nuclear weapons safety and security, none of which NNSA's "Complex Transformation" assumes as a reasonable course of action, much less seriously considers.

16|13C1

The draft SPEIS declares that *Should their [pits'] hermetic seal be broken (due to latent manufacturing defects, corrosion, or long term environmental stresses such as temperature and vibration), their reliability could be compromised in a short time. Consequently, judgments about new pit production capabilities and capacities are complex and warrant careful consideration.* P. 2-13, parenthesis in the original.

17|5C4

This smacks of speculative grasping at straws to justify 100's of billions of dollars for "Complex Transformation." The 1993 Sandia "Stockpile Lifetime Study" concluded that any manufacturing defects were caught and corrected in the first few years after production. That study also declared that "although nuclear weapons age, but they do not wear out: they last as long as the nuclear weapons community (DOD and DOE) desires. In fact, we can find no example of a nuclear weapon retirement where age was ever a major factor in the retirement decision."

18|8B1

Instead, "Complex Transformation" still largely revolves around the production of new-design nuclear weapons, the so-called Reliable Replacement Warheads, which could well introduce their own manufacturing defects, thereby possibly increasing the chances for resuming full-scale testing (which most agree would be a global nonproliferation crisis). Corrosion is most likely caused by the breaking of the hermetic seals that contain an inert atmosphere, and not vice versa. Concerning environmental stresses, there is no public evidence that in practice they would break the hermetic seals. Should NNSA know otherwise it should present the evidence publicly instead of invoking speculative bogeymen that are self-interested in arguing for 100's of billions of taxpayers money.

We suspect that the real reason NNSA wants expanded pit production is for new nuclear weapons designs, the so-called Reliable Replacement Warheads (RRWs). LANL planned to go into production of up to 50 RRW pits per year by 2012, but Congress rejected all funding for RRW, and from what we saw is very likely to do so again for FY 2009. Given that, even by NNSA's own terms, there is no need for the 50 to 80 pits production rate that it is still pushing for. That is except, of course, that expanded pit production is still all about producing new nuclear weapons, which NNSA has not given up on.

As an overarching issue, at Nuclear Watch's request Senator Jeff Bingaman successfully introduced legislation that required independent expert review of the projected length of

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plutonium pit lifetimes. Whereas NNSA had previously accepted that pits lasted 45 to 60 years, in November 2006 those experts concluded they last at least 875 years or more, without specifying any end date. This seriously undermined NNSA's argument for both new-design weapons and expanded pit production. Since the oldest pits in the planned stockpile are now 31 years old, why produce new pits, especially when existing ones can be "reused"?

6|5C1 (cont.)

Finally, and again, decisions implementing expanded production are premature before the already Congressionally required review U.S. of nuclear weapons policies.

One of the Major Faults of This SPEIS is Its Failure to Include the Kansas City Plant in Complex Transformation

A final environmental assessment (EA) and a Finding of No Significant Impact (FONSI) for building a new Kansas City Plant (KCP) has just been released by the General Services Administration (GSA) and NNSA as cooperating agencies.

In that final environmental assessment it is stated:

> Further, while the operations at KCP could be made more efficient at the proposed new KCP facility, a recent analysis has concluded that transferring these operations to a site other than one within the immediate Kansas City area would not be cost effective. (see Section 3.4) Consequently, the non-nuclear operations would remain at either the current KCP or the proposed new KCP facility because (1) KCP downsizing has benefits independent of the rest of the transformation proposal, (2) KCP downsizing decisions would neither affect nor be affected by the transformation decisions around proposed actions or alternatives in the SPEIS, (3) NNSA expects a decision on construction of the new KCP facility to be made prior to any decisions that would be made based on the SPEIS allowing NNSA to take advantage of projected cost savings, and (4) maintaining and downsizing the KCP in the Kansas City area is consistent with previous NEPA analysis and recent cost analysis. KCP draft EA, p. 19.

2|12 (cont.)

And

> The Kansas City Plant (KCP) was not included in the SPEIS because NNSA concluded that decisions regarding the consolidation and modernization of KCP's activities (the production and procurement of electrical and mechanical non-nuclear components) would not affect or limit the programmatic alternatives analyzed in the SPEIS, or the decisions NNSA makes regarding these alternatives. Neither the EA nor the SPEIS evaluate programmatic alternatives for NNSA's non-nuclear production activities (which include, but are far broader than, the activities performed at the KCP) because NNSA is not proposing any such actions regarding these activities. In other words, NNSA is not considering programmatic alternatives for its broad array of non-nuclear production activities and the facilities it uses for them. The proposed action in this EA is limited to the activities currently conducted at the KCP, the production of electrical and mechanical non-nuclear components. KCP Final EA, p. 146.

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Both of these passages are actually noteworthy retreats from NNSA's previous assertions in both Notices of Intent for the KCP environmental assessment and the Complex 2030 SPEIS (superceded by the subsequent Complex Transformation SPEIS) that decisions made elsewhere in the nuclear weapons complex were not expected to affect the Kansas City Plant and vice versa. At that time, this formed the central justification for KCP's exclusion from the Complex Transformation SPEIS. We also note that NNSA further attempted to justify KCP's exclusion in public comments by pointing out that the Plant's mission is "nonnuclear" given that it produces nonnuclear nuclear weapons components. We find that argument to be invalidated by the obvious fact that the Complex Transformation SPEIS does analyze and consider the fate of other declared "nonnuclear" sites, such as the Tonapah Test Range.

Herein, we incorporate by reference our complete and full comments on the draft Kansas City Plant environmental assessment, available at http://www.nukewatch.org/facts/nwd/NMWM_Comments_KCP_EA.pdf.

In summary, we concluded that:

2|12 (cont)

- The KCP "environmental assessment" should have been a more comprehensive "environmental impact statement."

- The General Services Administration (GSA) and the National Nuclear Security Administration (NNSA) should have ceased prejudicial actions that are already occurring. Instead, the agencies are fast tracking a predetermined outcome with little publicity and no public hearing.

- A more comprehensive environmental impact statement should have considered and decided upon cleanup and future uses of the old Plant. Cleanup is crucial for any possible economic development and future jobs, which Kansas City badly needs.

- A new Kansas City Plant should not be built before new national review of U.S. nuclear weapons policies, which Congress has already required.

- The Kansas City Plant, as one of the NNSA's eight active nuclear weapons sites, should be integral to NNSA's expensive and sweeping proposal to "transform" its nuclear weapons complex under its current Complex Transformation SPEIS. In fact, consolidation of KCP's missions to Sandia/NM was considered in the 1996 Stockpile Stewardship and Management PEIS, to which the present Complex Transformation SPEIS is technically a "supplement," Said consolidation was rejected at that time because it was deemed more expensive and environmentally damaging to move to a new facility. That justification is now mooted since NNSA now explicitly plans to move to a new Kansas City Plant, even if its only eight miles down the road from the old Plant.

- The EA's supporting "Business Case" justifying a new plant only within Kansas City limits is false and should be redone. It looked only at a GSA-owned, stand-alone facility bordering Sandia Lab in Albuquerque, NM, instead of considering likely cost savings from merging KCP's nonnuclear manufacturing operations within Sandia's existing management, security, facilities, infrastructure and capabilities.

- Private development of a nuclear weapons plant should be rejected. First, as a matter of principle, it is distasteful, and should be a function of government not driven by profit. Secondly, it will likely cost taxpayers far more and circumvents the traditional process of Congressional

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authorization and appropriations, even as Congress has called for increased consolidation of the nuclear weapons complex.

2|12 (cont.)

- Instead of categorically stating that there are no potential terrorist threats at a new Kansas City Plant, NNSA and GSA are obliged to complete a credible analysis of potential "Intentional Destructive Acts" (which include both terrorism and internal sabotage).

- Because of all of the above (and more), NNSA/GSA should withdraw this environmental assessment. NNSA should consider and decide upon the fate of the Kansas City Plant through its current Complex Transformation SPEIS process. However, even that process should await the outcome of pending review of U.S. nuclear weapons policies, which could dramatically reduce the size and nature of the nuclear weapons stockpile. That, in turn, could dramatically reduce NNSA's claimed need for expansive capabilities, eight individual sites, and their respective workloads. At this point, KCP's long-range workload is currently unknown, especially given recent Congressional rejection of new-design nuclear weapons under the so-called Reliable Replacement Warhead Program.

Intentional Destructive Acts

An unclassified summary of the classified appendix for intentional destructive acts must be released. The SPEIS states

> *With respect to intentional destructive acts, substantive details of attack scenarios and security countermeasures are not released to the public because disclosure of this information could be exploited by terrorists to plan attacks. Depending on the malevolent, terrorist, or intentional destructive acts, impacts may be similar to or would exceed accident impact analyses prepared for the SPEIS. A separate classified appendix to this Draft SPEIS has been prepared that evaluates the underlying facility threat assumptions with regard to malevolent, terrorist, or intentional destructive acts.* P. D-10.

An unclassified version of an analysis for Intentional Destructive Acts was released for the Lawrence Livermore National Laboratory BioSafety Level-3 facility, following a successful lawsuit appeal by Nuclear Watch New Mexico and Tri-Valley CAREs in the 9th federal district. That appeal had as its foundation in an earlier ruling by the 9th circuit in *NRC v. Mothers for Peace* stating that analyses of Intentional Destructive Acts was inherently required in NEPA processes.

19|13B1

Following the successful *TVC et al v. DOE* appeal DOE issued Department-wide guidance that Intentional Destructive Acts must be considered. Granted, case law has yet to be pushed to the point where it requires that an unclassified summary of a classified appendix on Intentional Destructive Acts must be released. Nevertheless, we assert here that a failure to do so circumvents the two 9th circuit appeal decisions and present DOE guidance. We further assert that NNSA must prepare an unclassified summary of Intentional Destructive Acts for the Complex Transformation SPEIS.

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Specific Comments

20|7N1 **The environmental impacts of the preferred alternative must be prominently displayed in the summary.** The SPEIS, especially the Summary, is poorly written and confusing. Preferred alternative should have its own column in the tables at the end of the summary. This includes *Table S.3.16-1 — Comparison of Environmental Impacts among Programmatic Alternatives*.

21|5C5 Granted, the preferred 50/80 Alternative for plutonium pit production is mentioned in the Consolidated Plutonium Center (CPC) column, but it is buried. Moreover, the specific 50/80 Alternative is not mentioned in all of the Environmental Impacts categories. In sum, the environmental impacts of the preferred alternative must be prominently displayed and not hidden or buried in tables or later chapters.

The ongoing problem of transuranic waste disposal must be truthfully addressed. The Waste Isolation Pilot Project (WIPP) is not depicted in DOE maps of the functional nuclear weapons complex. WIPP is an essential component because that is where bomb production wastes are dumped.

WIPP is currently scheduled to close around 2035, and all subsequent nuclear weapons waste has no declared disposal path. The preferred 50/80 Alternative would generate an additional 575 cubic yards of radioactive transuranic (TRU) waste per year. The draft SPEIS assumes that this increasing TRU waste will be packaged and shipped to WIPP in southern New Mexico for disposal. However, WIPP is already about 40% full from past bomb making and the remaining space is already all accounted for. There is currently no room for added TRU waste. Further, the CMMR is planned to operate for 30 years after WIPP's scheduled closure in 2035, so closure would happen before most of the Bombplex production even occurs.

22|14M4 Please refer to, and include in the SPEIS reference documents, "*ANNUAL TRANSURANIC WASTE INVENTORY REPORT – 2007, DOE/TRU-2008-3379.*" Tables 3.1 and 3.2 give the total of 5,272,479.7 ft^3 of anticipated volumes and emplaced volumes of TRU waste. The design capacity for WIPP is 175,564 m^3 (6,200,000 ft^3), as set by the Land Withdrawal Act (LWA). Where the inventory busts the LWA limits is when the "potential" wastes are added -- see Tables 4.1 (CH) and 4.2 (RH).

With future potential wastes, contact-handled wastes exceed the limit by 5,000 m^3 and remote-handled wastes by more than 1,500 m^3, or a total of 229,545 ft^3 over WIPP's limits. Potential waste essentially already exists under the Complex Transformation proposal, and will need a new repository. The new TRU waste from expanded pit production is not included or even mentioned in the above WIPP inventory report.

Therefore:

- The Complex Transformation SPEIS must analyze where all radioactive and hazardous wastes from continuing nuclear weapons R&D and production will be permanently disposed of.
- The SPEIS must analyze the impacts of storing TRU waste at the generator sites until they can be shipped to WIPP or a "WIPP-like" facility. Please note that previously touted "Quick-to-WIPP" initiatives at LANL were anything but quick, and that above ground storage there of TRU wastes remain a serious environmental, public safety, and

Intentional Destructive Acts threat.

- The SPEIS must analyze what happens after WIPP is closed. The SPEIS must analyze where yet more bomb making wastes will go.
- If future Complex Transformation TRU wastes are generated in time to be disposed of at WIPP, potential existing TRU wastes at other sites, which could include environmental restoration wastes, could get bumped out of WIPP. The SPEIS must analyze the impacts of a possible TRU waste shell game that continues indefinitely on into the future.
- Please include in the SPEIS reference documents, "*ANNUAL TRANSURANIC WASTE INVENTORY REPORT – 2007, DOE/TRU-2008-3379*"
- Storing future Complex Transformation TRU wastes in Hardened On-Site Storage (HOSS) facilities must be analyzed for the sake of public safety and mitigating possibly serious environmental threats.

22|14M4 (cont.)

Define "WIPP-like facility"
Both TRU waste and LLW would be generated at the CPC [Consolidated Plutonium Center] site. DOE's Waste Isolation Pilot Plant (WIPP) near Carlsbad, New Mexico or a WIPP-like facility would be the destination for TRU waste from all CPC alternative sites. (Pg. A-9)

Please describe what is meant by a "WIPP-like facility." Does it mean a deep salt mine near Carlsbad, NM? Does it mean a facility that takes 20 years to get a permit? Does it mean a facility that the State of New Mexico will never allow to be expanded?

- Please do not include imaginary facilities in this SPEIS.
- Lacking any real disposal facilities, please withdraw, rewrite and re-release the SPEIS.

Low-Level Radioactive Waste cannot go to LANL's Area G
The 50/80 Alternative will also generate an estimated 1,850 cubic yards of "low-level" radioactive wastes annually. These wastes would be processed at the Solid Waste Management Facility in TA-54 and disposed of on-site at TA-54's Area G. But Area G itself is due to be closed in 2015. There is still time for the public to convince the New Mexico Environment Department (NMED) to require that LANL remove this waste rather than cap and cover and leave it in place as the Lab plans.

23|14M2 However, LANL also plans to expand Area G into "Zone 4," which will be much of the same – unlined dumps above our groundwater aquifer that will likely leave radioactive wastes permanently. The New Mexico Environment Department (NMED) will largely drive future cleanup decisions. However, internal Lab documents already point to predetermination, saying "Many contaminated sites will be remediated to industrial use standards, in part because cleaning up to residential or unrestricted use standards is prohibitively expensive."

Cleanup and disposal that will protect ongoing generations cannot be dictated by today's short-term fiscal considerations. If more money is needed for comprehensive cleanup or better disposal methods, take it from the budget for the Lab's nuclear weapons programs. Don't bury more radioactive and chemical wastes when cleanup costs are already "prohibitively expensive."

- Environmental impacts of past radioactive waste dumping at Area G are unknown because of problems with LANL's monitoring well system due to the use of drilling muds and additives that are known to mask contaminants. No further additional LLW waste should be added to Area G until the legacy waste impacts are known and mitigated.
- No more waste should be dumped at Area G until the actual impacts of past dumping are known.

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All true alternatives for safe storage of waste must be identified and analyzed

Given potential future innovations that could provide safer disposal methods, or the discovery of greater risks at any one site than previously foreseen, it is necessary *ipso facto* that all disposal options be reversible. 24|14M3

- At a minimum, DOE must consider interim "Hardened On-Site Storage" (HOSS) at existing nuclear facilities as a real alternative (further discussion immediately below).
- Should DOE summarily reject HOSS, please explain why.

D&D must be analyzed more in depth

Complex Transformation will involve the decontamination and decommissioning (D&D) of many existing contaminated facilities. Large volumes of radioactive and hazardous wastes will be shipped and dumped in a number of sites across the country. The D&D of some of these buildings is mentioned, but the environmental impacts are not analyzed in depth.

- Please list all the buildings that will be D&Ded for the preferred alternative. The cost of D&D of LANL CMR must be included.
- Please include the environmental impacts of the D&D of all unused or replaced buildings.
- Please consider the alternative of storing all waste on-site.
- For all of the alternatives, the SPEIS must describe where that waste will be stored and disposed, and the costs and impacts of such storage and disposal. 25|7J2
- The environmental impact of increased waste going to private waste disposal facilities must be analyzed. Despite the fact that wastes may end up in a private waste facility, those facilities still need environmental impact statements for the communities living near private disposal facilities.
- The full cost of D&D of existing facilities, the cost of designing, constructing, operating, decontaminating, and decommissioning all the facilities must be fully analyzed and the costs described in the draft SPEIS. In the words of the SPEIS' Notice of Intent, how these costs are "economically sustainable" must be fully described and evaluated.
- Please describe the health and environmental impacts of the existing complex as well as the proposed new complex.
- Please project cleanup costs of Complex Transformation.

D&D of CMR must be included in this SPEIS

Strangely absent from this SPEIS is any mention of the decontamination and decommission of the old Chemistry and Metallurgy Research (CMR) Building at LANL. The 2004 CMRR ROD decided that, "The existing CMR building would be decontaminated, decommissioned and demolished in its entirety…" Is it absent from this SPEIS because of the cost? The cost of D&D of CMR must be included. The estimated cost of D&D for Y-12 is included and given as $20 billion. The impacts of D&D of many other buildings around the complex are analyzed. This includes the estimated amounts of wastes and soils to be removed. 26|7J3

It is stated in the SPEIS that CMRR must be built because CMR is too costly to maintain. If the cost of D&D of CMR is compared to the cost of maintaining CMR, there might be a good reason to keep CMR online.

- Please do a cost-benefit analysis of the costs of upgrading CMR, including seismic upgrades, versus the costs of D&D of CMR plus the construction cost of CMRR.
- The impacts of D&D of CMR must be analyzed in this SPEIS.
- Further, the costs of all D&D must be included.

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State the needed size of the CMRR

The 2004 CMRR Record of Decision (ROD) decided to implement the preferred alternative, alternative 1, which is the construction and operation of a new CMRR facility within TA–55 at LANL. The new CMRR facility would include two buildings (one building for administrative and support functions, and one building for Hazard Category 2 SNM laboratory operations), both of which would be constructed at above ground locations (construction option 3).

Page 2-20 of the CMRR EIS states that the Hazard Category 2 facility would be "approximately 200,000 square feet."

Construction Option 3: *This construction option includes a single consolidated SNM-capable Hazard Category 2 laboratory and a separate administrative offices and support functions building. In this option, all Hazard Category 2 and 3 operations would be housed in the single Hazard Category 2 laboratory. The Hazard Category 2 building would contain a total of approximately 200,000 square feet (18,580 square meters) and be constructed with one floor below grade containing the Hazard Category 2 operations, and one floor above grade containing Hazard Category 3 operations.* 27|5C6

The reference document, *"Independent Business Case Analysis Of Consolidation Options For The Defense Programs SNM And Weapons Production Missions"* states that 281,000 square feet are needed for the CMRR-Nuclear Facility (NF) to produce 50-80 pits. (*Table 7-2. Level IIB1 Construction and Modification Costs for LANL*)

So, it seems that a 200,000 ft^2 CMRR-NF, as originally envisioned in its 2003 EIS, is not sufficient to produce 80 pits per year. The CT SPEIS never gives a square footage for the CMRR.

- Given the central importance of the CMRR-NF to NNSA's preferred 50/80 pit production alternative, NNSA must clearly state the facility's ultimate proposed size.
- If over 200,000 ft^2, the Complex Transformation SPEIS must conduct adequate NEPA analysis for additional square footage over that analyzed in the CMRR EIS. Further, NNSA needs to specify as to whether further facility-specific NEPA analysis might be necessary.

Please explain the additional 9,000 ft^2 needed for the CMRR

This SPEIS is confusing as to whether an additional 9,000 ft^2 for CMRR is needed. Various references follow:

S.3.4.1.2.2 Los Alamos Upgrade Alternative to Provide Up To 80 Pits per Year ("50/80 Alternative") The 50/80 Alternative includes completing the previously analyzed CMRR facility, ***which could require expansion by up to 9,000*** *additional square feet, to accommodate pit manufacturing operations.* (P. S-35) 27|5C6 (cont.)

The 50/80 Alternative would involve expanding the current pit production capabilities in Building PF-4 and completing the CMRR Facility, ***with the potential addition of approximately 9,000*** *square feet, to support production of up to 80 pits per year.*
…
The 50/80 Alternative includes completing the previously analyzed CMRR facility, ***and could require expansion of it by up to 9,000*** *additional square feet to accommodate pit-manufacturing operations.* (P. 3-37)

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*Additionally, this alternative includes the **CMRR-NF facility, which would be expanded by approximately 9,000 square feet to approximately 209,000 square feet,** to accommodate pit manufacturing operations.* (P. 5-10)

*…For the 50/80 Alternative, the **CMRR-NF would be constructed and expanded by approximately 9,000** square feet.* (P. 5-53)

*These alternatives would involve additional process efficiencies and, **possibly** for the Los Alamos Upgrade Alternative and the Los Alamos 50/80 Alternative, require physical expansion of facilities or construction of additional facilities to provide for the manufacture of more pits than are evaluated in the LANL SWEIS.* (P. 1-17, bolded emphases added in all these quotes.)

NNSA is dodging this issue. We don't know what the additional 9,000 square feet is added to or if it is needed.

- Please state if an additional 9,000 square feet is definitely needed in the CMRR-NF for the preferred 50/80 plutonium pit production alternative.

An alternative that does not involve the CMRR-NF must be analyzed

27|5C6 (cont.)

All Alternatives, including the No-Action Alternative, include the construction of the CMRR-NF. This makes the CMRR-NF at LANL a predetermined fact.

- Please analyze Complex Transformation without the CMRR-NF.

Keep the Phases straight at CMRR

The Chemistry and Metallurgy Research Building Replacement, currently under construction, will provide chemistry and metallurgy research, actinide chemistry, and materials characterization capabilities. (Pg. 5-7)

NNSA wishes that the CMRR-NF would be under construction. The part of CMRR that will provide chemistry and metallurgy research, actinide chemistry, and materials characterization capabilities IS NOT UNDER CONSTRUCTION! Construction of the CMRR Nuclear Facility (CMRR-NF) is on hold until after this SPEIS.

- Please correct this factual error.

Expanded Plutonium Pit Production Diverts Resources

Expanded production could block LANL from much needed mission diversification into addressing today's real national security threats, such as nonproliferation, energy independence and global warming. 65% of the Lab's Budget goes to nuclear weapons programs. LANL cut its budget request for nonproliferation programs by 20%. 0 % of the Lab's budget request is for renewable energy R&D.

- Please analyze what LANL could do for real national security if it weren't building unneeded pits.

New research concerning nanoclusters must be included

28|14K10

New research from Argonne National Laboratory indicates that plutonium nanoclusters can travel more readily through soil and into groundwater. The SPEIS does not assess the potential for the plutonium waste from past activities; ongoing or future pit production to contaminate soil, air or groundwater in the form of nanoclusters. Thus the risk analysis for plutonium exposure of the public and the environment could be defective.

- Please include an analysis of the health impacts of plutonium nanoclusters.

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Section 3.2.10 is missing

2|12.0 (cont.)

The General Services Administration (GSA), as the lead agency, and NNSA, as a cooperating agency, are preparing an Environmental Assessment to evaluate the potential environmental impacts associated with relocating the facilities and infrastructure for the non-nuclear production activities conducted at KCP. This SPEIS does not assess alternatives for the activities conducted at KCP (see Section 3.2.10). Page 1-5

A more detailed explanation of why the Kansas City Plant non-nuclear operations are not included in this SPEIS was added (see Section 3.2.10). Page D-11

There is no section 3.2.10. Please re-release this SPEIS with a relevant Section 3.2.10.

Radiological Air Emissions must be accurately addressed

29|14D1

The LANL radiological air-sampling network, referred to as AIRNET, measures the environmental levels of airborne radionuclides, such as plutonium, americium, uranium, tritium, and activation products that could be released from LANL operations. Most regional airborne radioactivity comes from the following sources: (1) natural radioactive constituents in particulate matter (such as uranium and thorium), (2) terrestrial radon diffusion out of the Earth and its subsequent decay products, (3) material formation from interaction with cosmic radiation, and (4) fallout from past atmospheric nuclear weapons tests conducted by several countries. Pg. 4-17

The AIRNET stations are routinely turned off due to lack of funding and other reasons.

- Please provide the percentages of items 1-4.
- Please compare the above percentages to the activation products produced by LANSCE.

Impacts of Legacy Waste must be analyzed

28|14K10 (cont.)

Overall, the SPEIS fails to address the enormous radioactive and hazardous waste environmental cleanup issues that resulted from the last five decades of nuclear weapons manufacturing. NNSA proposes to proceed with additional pit production and weapons production, but is not addressing or providing adequate funding for cleanup of the horrific existing contamination confronting communities at all existing DOE sites.

- The impacts of leaving legacy waste in the ground while spending money on new facilities must be analyzed.

The SPEIS must analyze the impacts to farmlands in Northern New Mexico

30|14A1; 31|14E.11

The SPEIS claim that there are no prime farmlands in the vicinity of LANL is wrong. Before the Atomic Energy Commission arrived on the Pajarito Plateau in 1943, all this land was prime farmland. LANL is located within the food basket of Northern New Mexico. NNSA has not analyzed the additional amount of water resources that it will use for future Complex related activities at LANL nor the diversion from, and/or contamination of, the water for agricultural activities into the future.

1. NNSA must retract the draft Complex Transformation Supplemental Programmatic Environmental Impact Statement and reassess the LANL impacts to agriculture. Then NNSA must submit the revised draft to the public for review and public comment.

The Cumulative Impacts of multiple sites must be addressed

32|14O1

The 50-mile radius analysis of impacts of LANL and SNL overlap.

- The cumulative impacts to the public of these two facilities must be analyzed.

NEPA Categorical Exclusions must be included in the cumulative impacts

33|14O2 There are probably hundreds of categorical exclusion determinations for operations at the nuclear weapons complex's many sites. These exclusions probably include several D&Ds of vacant laboratory buildings. DOE NEPA regulations state that categorical exclusions should only be implemented if they "do not individually or cumulatively have a significant effect on the human environment" (10 CFR 1021.410).

- Please list all the categorical exclusions at all sites.
- DOE must make the list of categorical exclusions available online and update it regularly.
- Please provide a reason why each of the exclusions should be excluded from NEPA review, and why each does not and together cumulatively have a significant effect on the environment.

Complex Transformation must stringently minimize the use of our precious water.

34|14E5; 35|14E.8 Many DOE nuclear weapons facilities have been historically located next to abundant water sources, but LANL was not. When it was primarily a design laboratory, lack of water was not so large a problem. But now that the Lab is positioned to become the nation's plutonium pit production center, LANL is starting to covet the scarce water resources of the desert Southwest.

- Explain the water conservation programs to be used in Complex Transformation.

Hardened On-Site Storage (HOSS) must be considered as an alternative

36|14M5 In our view, radioactive wastes should be safely stored as close to the site of generation as possible and be safeguarded in hardened, on-site storage facilities. HOSS facilities should be considered and analyzed from the perspective that these wastes must be zealously protected from risks posed by wildfire or other natural or man-made disasters. HOSS facilities must not be designed as permanent waste disposal solutions, and therefore should not be constructed deep underground. The wastes must be retrievable, and real-time radiation and heat monitoring at the HOSS facility must be implemented for early detection of radiation releases.

The overall objective of HOSS should be such that the amount of release projected in even serious terrorist attacks should be low enough that the storage system would be unattractive as a target to begin with. Design criteria must include resistance to severe attacks, such as a direct hit by high explosive or an aircraft loaded with fuel and/or explosives.

- Please explain why HOSS was not posed as an alternative in this SPEIS.
- If HOSS is not analyzed in the final SPEIS, please provide detailed reasons for its rejection.

Protect those most at risk

37|14K1 Many federal radiation protection standards, such as limits on how much residual radiation will be allowed in contaminated soil, are based on "Reference Man." That is defined as a hypothetical adult "Caucasian" male who is 20 to 30 years old, 154 pounds in weight, five feet seven inches tall, and is "Western European or North American in habitat and custom." However, other groups, including women, children, and embryos/fetuses, are more sensitive to the harmful effects of radiation or toxic materials.

The government's model for setting residual radioactivity standards for cleaning up radioactively contaminated sites (RESRAD) pictures a family on its front panel display, but its standard calculating model converts contamination to radiation dose only for "Reference Man." In the context of clean up and storage of nuclear waste at Department of Energy sites, the risk to

37|14K1 (cont.) a pregnant woman farmer, the fetus, and her children should be evaluated, rather than Reference Man.

- As a matter of principle, the most potentially vulnerable human beings should be protected, instead of Reference Man.

Response to comments must be robust

38|2J The response to scoping comments in this draft SPEIS was not so good because the responses to comments are not by topic and "Table D.2-2 — Summary of Scoping" refers back to sections of the SPEIS instead of just responding in Appendix D. We request that the response to comments for this SPEIS be similar to the Response to Comments in the Kansas City Plant final Environmental assessment (DOE/EA – 1592), which in format and devoted length (but not substance) we found to be surprisingly good. Specifically, please include a table in the final SPEIS similar to "Table B-3 – Issue Category Associated With Each Document" in the KCP final EA. We also request treatment similar to the "Issue Analysis of Public Comments" in the KCP EA.

- Please include a Table in the final SPEIS similar to "Table B-3 – Issue Category Associated With Each Document" in the KCP final EA.

Respectfully submitted,

Jay Coghlan, Executive Director
Scott Kovac, Operations Director
John Witham, Communications Director

Cohen, Marcia

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PC_1151

Levens, Matthew

From: Marcia Cohen [marcia.cohenhoh@verizon.net]
Sent: Thursday, March 27, 2008 6:59 PM
To: Complex2030
Subject: No new nuclear weapons

Marcia Cohen
243 S. Broadway
Hastings-on-Hudson, NY 10706-2904

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A (cont.) There is no need for more nuclear weapons. Why build a plant to produce more unneeded armaments?
I do not want to modify already existing nuclear facilities to build additional nuclear arms.
2|1J Building a new plant to produce plutonium pits sends the wrong message to the rest of the world. Why should other countries not seek nuclear weapons, if we continue to add to our stockpiles?
Congress did not pass the last attempt to upgrade our arsenal and should reject this irresponsible program too.

Sincerely,

Marcia Cohen

1

Colla, Patricia

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PC_1828

Levens, Matthew

From: Patricia Colla [p.colla@yahoo.com]
Sent: Wednesday, March 26, 2008 9:39 AM
To: Complex2030
Subject: nuclear weapons program

Patricia Colla
380 Auburn Rd.
West Hartford, CT 06119
March 26, 2008

Theodore Wyka
Complex Transformation SPEIS Document Mgr.
U.S. Department of Energy
1000 Independence Ave.S.W.
Washington, D.C. 20585

Dear Mr. Wyka,

1|9B 2|14O I am a Sister of Mercy and am troubled to learn that the Department of Energy plans to refurbish the U.S. nuclear weapons-building capacity through the Complex Transformation program. The cost of this program will be at least $150 billion, money that can be better spent on social programs to benefit our nation's poor. In addition, the production of these new weapons will produce toxic substances that remain dangerous for thousands of years and will cause irreparable damage to our planet.

3|1F This program clearly violates the Nuclear Proliferation Treaty, to which the United States is a signatory. It also provides further evidence that the U.S. intends to continue developing and expanding its nuclear arsenal while demanding that other countries abandon their nuclear ambitions.

It is time for the leaders of the United States to take the lead in nuclear disarmament instead of continuing to build arsenals aimed at destruction. I urge you to deny granting environmental clearances needed for the Complex Transformation to proceed.

Sincerely,

Patricia Colla, RSM

Never miss a thing. Make Yahoo your homepage.

5/16/2008

Collins, Judith

Page 1 of 1

PC_1404

Levens, Matthew

From: Judith Collins [jamcollins@livingspirits.com]
Sent: Tuesday, April 08, 2008 1:54 PM
To: Complex2030
Subject: Reject "Complex Transformation' plan to build nuclear weapons

Judith Collins
1280 Furlong Rd
Sebastopol, CA 95472-9169

April 8, 2008

Theodore A Wyka
Complex 2030 SEIS Document Manager
Office of Transformation, U.S. Department of Energy, NA 10.1 1000 Independence Avenue, SW.
Washington, DC 20585

Dear Theodore Wyka:

1|16A The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal.

2|14O, 3|9B Please do not allow the building of any new nuclear weapons. Use money to clean up what we have and disarm existing nukes. This techrology is poisonous to the planet and human life. Stop Stop Stop.

4|1J By building up its nuclear arsenal right now, the US is essentially telling the world, "Do as I say, not as I do."

Sincerely,

Judith Collins
707-829-5475

Collins, Kayce

Page 1 of 2

PC_156

Kayce Collins

Greetings I'm 11 year old Kayce Collins. We really dont need to build this bomb plant. Because it is a waste 1|16A of time. We could be using the land for gardens, pastures to keep horses, cows, 2|9B sheep, ~~deer~~, ducks and other wild life. We could also be using the land to build houses for the homeless.

We could become extinct because of all the toxic waste like depleted 3|14O uranium, and mercys and other deadly chemicals used in the plant. These deadly chemicals are killing the envirnment. If

Collins, Kayce
Page 2 of 2

Hello my name is Will M. Collins.

1|16A(cont.) Your bomb plant is a life extinction workshop. Like the time when the bomb was dropped on Hiroshima. Because thousands, millions of people died from the big explosion, it makes my heart cry. How, how, how do you not feel it, or do you? The suffering of people is very, very serious

This is why I'm asking you to shutdown these because

Collins, Michael
Page 1 of 2

PC_1020

QUESTIONS FOR THE DEPARTMENT OF ENERGY/ LANL (PLEASE REPLY ON RECORD IN WRITING) **MARCH 13, 2008**

1|14E Do you, the Department of Energy or it's contractors think every aspect of the weapons program at LANL is under control including contamination of groundwater?

Would you drink water from the Buckman wells or from the Cochiti Lake, both downstream from LANL, on a daily basis and give it to your babies or family?

2|14M.1 How is the Los Alamos National Laboratory weapons program different from Rocky Flats or Hanford regarding the need for cleanup, the need to be closed and the need to be declared a Superfund site?

3|14M.2 Why was Rocky Flats closed?

Based on the Rocky Flats and Hanford standards should LANL be closed?

4|3A Why do we, or you, need several thousand plutonium pit triggers? Why do you need to produce new ones and what's wrong with your existing stockpile? Is it not true that the pits are expected to last from fifty years to a century or more?

5|1F Will increased production of nuclear pits violate the Nuclear Nonproliferation Treaty which was ratified by the U.S. in 1970? Has the possibility of treaty violatiton even been considered?

If a surprise DOE Tiger Team showed up at Los Alamos tonight(or at any time) do you, LANL or it's contractors, believe the lab would meet inspection standards and not have any problems? What issues or problems exist now that you are aware of or do you foresee in the future?

3|14M.2 (cont) Are hazardous radioactive materials from LANL entering the groundwater now, March, 2008, or have they ever at Los Alamos? My understaning is that once water tables or aquifers have been thus contaminated you cannot go back or remediate them to their previous safe, pristine status.

6|14H Is there any need for hazardous radioactive concern or cleanup in the counties of Los Alamos, Santa Fe or Rio Arriba, or at San Ildefonso Pueblo or at any Pueblo?

Will DOE or it's contractors or the Los Alamos city/county government ever return to San Ildefonso Pueblo the land they took from the Pueblo over the years ? When?
If financial compensation occurred, was that sufficient for the Pueblo?

Would Northern New Mexico be better off environmentally or health and safety-wise if there was no weapons work at Los Alamos?

Thank you,
Michael T.Collins
3 Old Santa Fe Way
Santa Fe, NM 87505

Michael T. Collins

Santa Fe, NM

Collins, Michael
Page 2 of 2

7|2F I'm happy glad to see all the police are here to keep an eye on the crazy scientists among us.

Colombatto, Gina
Page 1 of 1

PC_1680

Levens, Matthew

From: siamo123@sbcglobal.net
Sent: Saturday, April 05, 2008 6:35 PM
To: Complex2030
Subject: Complex Transformation SPEISComments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|16A The DOE should focus on shrinking the still-oversized nuclear weapons complex and on maintaining the safety and security of our existing weapons arsenal as the size of our nuclear stockpile is reduced.

I ask that you include my comment as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project.
Thank you.

Sincerely,
gina colombatto
7606 woodland lane
fair oaks, CA 95628

cc:
Senator Dianne Feinstein
Senator Barbara Boxer
Representative Dan Lungren

Connor, Elizabeth

Page 1 of 1

PC_867

Levens, Matthew

From: elizabeth connor [eaconnor@sbcglobal.net]
Sent: Saturday, March 29, 2008 4:33 PM
To: ComplexZ030
Subject: Complex transformation

1|16A Dear Mr. Wyka, I am opposed to the NNSA plan for complex transformation. I oppose nuclear weapons of any kind and do not want any kind of upgrade or new production to proceed at this time. Let the next administration deal with the matter. Elizabeth Connor

Conradson, Steven

Page 1 of 1

PC_1075

Buenaflor, Delight

From: Steve Conradson [conradson@lanl.gov]
Sent: Thursday, March 13, 2008 11:16 AM
To: DIV.Complex.Transformation
Subject: comment on Complex Transformation SPEIS

Steven Conradson
9 Los Arboles
Los Alamos, NM 87544

I am writing this comment as a private citizen despite using my LANL email address.

The Transformation plan is beneficial in all respects and is an essential component of nuclear arms reduction by virtue of its role in ensuring the reliability of the stockpile. A new plutonium laboratory will significantly enhance worker safety and productivity and diminish the environmental impact not only from routine work but also the possibility of unplanned releases. The Transformation plan is also necessary to maintain the scientific capabilities and quality of the lab as a whole. As someone who works on both weapons and non- weapons projects, including not only related ones such as nuclear energy but others such as fuel cells and magnetic materials, not only will the weapons work maintain the LDRD level but I have found that weapons work I have performed both helped provide equipment and software used in these other project and cross fertilized non-weapons projects via the scientific ideas and concepts that is fostered. I am therefore adamantly in favor of NNSA proceeding with the plan.

1|15A

1

Cooke, Brenda

Page 1 of 1

PC_202

Dear Sir,

1|5C My husband is a current employee of B&W Technologies at the Y-12 National Security Complex. Being an employee is also being a participating team member for the successful completion of the many missions that we have placed before us. Every active employee as well as former employees are eager to endorse the concept of our plant becoming the "Uranium Center of Excellence."

Maintaining our nuclear deterrent capabilities is paramount in avoiding major world conflict. No one wants war and this is a great prevention of major conflict.

Our plant has traditionally been a major contributor to the local and state economy by our payroll being spent in the local area and our plant purchasing system adding to the local and the state economies.

2|15A My husband is an active member of a local union and we can see first hand how well the company and the union can be successful at any endeavor provided they share a common goal. The workforce at this plant is highly trained and has an excellent safety record.

Y-12 National Security Complex helps to ensure security for America in its successful completion of any mission we have been taxed with. The local union and company have always risen together to meet new challenges.

I am thankful for the quality of life that has been afforded to me through my husband's employment. My husband and I have raised two wonderful children who provide services to the local communities through their employment.

Sincerely,

Brenda Cooke
715 Bales Hollow Rd
Friendsville, Tn
37737

Cooke, Darrell

Page 1 of 1

PC_203

Dear Sir,

1|5C I am a current employee of B&W Technologies at the Y-12 National Security Complex. Being an employee is also being a participating team member for the successful completion of the many missions that we have placed before us. Every active employee as well as former employees are eager to endorse the concept of our plant becoming the "Uranium Center of Excellence."

Maintaining our nuclear deterrent capabilities is paramount in avoiding major world conflict. No one wants war and this is a great prevention of major conflict.

Our plant has traditionally been a major contributor to the local and state economy by our payroll being spent in the local area and our plant purchasing system adding to the local and the state economies.

2|15A As an active member of a local union I can see first hand how well the company and the union can be successful at any endeavor provided they share a common goal. Our workforce is highly trained and have an excellent safety record.

Y-12 National Security Complex helps to ensure security for America in its successful completion of any mission we have been taxed with. Our union and company have always risen together to meet new challenges.

I am fortunate to be a part of this complex and thankful for the quality of life that has been afforded to me through my employment. My wife and I have raised two wonderful children who provide services to the local communities through their employment.

Sincerely,

Darrell Cooke
715 Bales Hollow Rd
Friendsville, Tn
37737

Cooke, Darrell

Page 1 of 1

PC_420

Levens, Matthew

From: Cooke, Darrell Lynn (DQL) [cookedl@y12.doe.gov]
Sent: Friday, February 22, 2008 6:31 AM
To: Complex2030
Subject: Comments

Dear Sirs,

I am in favor of the renovation and improvement of the Y-12 facilities.
1|15A The addition of a second Turtle Building for the processing of our product for NNSA is a very important step in building on that future. I wholeheartedly support that effort not only as an employee, but also as a voting taxpayer.

I would appreciate your adding my name to the list of support for this project.

Thanks,
Darrell Cooke
Resource Programs
576-6765

1

Copeland, Linda

Page 1 of 2

PC_1431

Levens, Matthew

From: Linda Copeland [lecopeland@ucdavis.edu]
Sent: Tuesday, April 15, 2008 11:38 PM
To: Complex2030
Subject: public environmental impact statement

Historically the RRW program had been modest (for example, ~ $25 million in 2006). If the exorbitant and wasteful NNSA-RRW program is allowed, the RRW program will no doubt evolve into a multi-billion dollar effort to redesign the entire nuclear stockpile, which is totally unnecessary and decreases our security. It would undermine the International Non-Proliferation regime, would likely lead to new nuclear weapons testing and would reduce
1|9A, the threshold for use of nuclear weapons. There is no need for an RRW program as the current U.S. nuclear weapons stockpile is capable, reliable, safe and secure. This reliability and safety can be maintained with proper curatorship at much less cost and
2|14O, much less environmental degradation and worker exposure to radiation while our real
3|14m.3 security problems, our dependency on foreign oil and the dangers of global warming are addressed. A broad RRW program would disrupt efforts to eliminate clandestine trafficking in nuclear materials and equipment.
The DoD will demand that any new warhead which the RRW program might create undergo full nuclear explosive tests before it is accepted into the stockpile. Such nuclear weapons testing would likely trigger a new nuclear weapons arms race, which simply threatens the
4|1J, whole planet. In a curatorship program, as components age, they can be replaced with identical or nearly identical copies of the original. Only in rare instances when a component can't be replaced with an identical/nearly identical copy should any
5|8A, modifications be considered. By strictly limiting any changes to nuclear weapons, NNSA can avoid potential degradation in its confidence in the stockpile that might arise from accumulating small changes to well-tested warhead designs. RRW does not focus on the
6|16A, needs of our country, the needs of the American people, or our secruity. RRW simply fulfills the top myopic priority of weapons
labs: preservation of funding and jobs in a "dead end" paradigm that ultimately threatens us all. Congress should elimiate all funding for the RRW and cancel the program. The American people have good survival instincts and know how horrible and unnecessary nuclear weapons are.
Even Henry Kissinger said we should work toward zero nuclear weapons. The goal should be creating a world in which nuclear weapons don't have to be used; where there is no need to even think about their use. Nuclear weapons do more to empower the weak than to empower a nation like ours (even though we use our nuclear weapons might to threaten other nations):
7|13A.1 they breed terrorism as a counter-control force: this is part of what is driving the global rise in terrorism. I and every one I know feels more insecure now than I've ever felt in my life (this is not good for psychological well-being). Secure? No,despite more than 90 different nuclear weapons designs that have been developed into prototypes and 65 of these that have entered the stockpile; each being tested extensively.
The US conducted more than 1000 nuclear explosive tests in the atmosphere and underground and these tests exposed people to radiation, resulting in increased cancer deaths by the tens of thousands. More than 70,000 nuclear weapons have been built and deployed in the
8|3A US and the stockpile still stands at 10,000 today (enough to kill all life on the planet through nuclear winter). Many controversies surround the proposed Yucca Mountain nuclear waste storage site. The long-term management of this high-level radioactive waste can never be resolved safely (we kid ourselves thinking we can safely store such intense radioactivity with such ridiculously long half-lives that is so extremely dangerous to our biology). There is not even any true military need for RRW! Military commanders already have a variety of low-yield explosive options (god forbid they ever have to use even those). They can select yields as low as 5 kilotons from warheads on cruise missiles and as low as 0.3 kilotons from some bombs. To change topics, independent studies have shown that the proposed Robust Nuclear Earth Penetrator (RNEP) would still cause substantial collateral damage compared to other capabilites to attack buried targets. Plus, potential adversaries could simply bury their valued assets even deeper or place them inside of mountains. Thus, there is nothing to be gained by making systems more capable against hard and deeply buried targets. Also consider that a new reduced collateral damage nuclear warhead would be provocative and would reduce the threshold for using nuclear weapons, which would likely open up a world wide Pandora's box (be careful what you ask

1

Copeland, Linda
Page 2 of 2

for). There are few missions imaginable in which nuclear weapons would need to make full use of new precision guidance technologies, since cruise missiles can already deliver nuclear warheads to within a few meters of a target. Nuclear weapons should NOT be geared for small-scale strikes-BECAUSE it would be too dangerous a temptation to use them, which would be a crime against humanity. Proponents of the RRW program grossly overstate the overall problem of weapons aging. After reviewing a classified "Stockpile LIfe Study" performed by Sandia National Laboratory, one expert concluded "...there is not known to be any upper limit on weapon life, given appropriate maintence and renewal of perishable materials and parts (e.g. tritium)". RRW and Complex Transformation supporters claim it will be cheaper to design and build new weapons than to maintain existing warheads, but the DOE laboratories have never done anything simply and cheaply. They have a history of enormous cost overruns, and this will invariably happen again with Complex Transformation, at a very perilous time in our economy, which is in recession and heading toward a depression, which will only further destabilize the world. Hopefully everyone reading this has children and cares enough about them and their future to prevent the insanity of Complex Transformation.

PC_1491

Linda Copeland M.D., F.A.A.P.
Developmental Pediatrician

2

Corbett, Dave
Page 1 of 5

PC_507

Buenaflor, Delight

From: Corbett, David W [dwcorbe@sandia.gov]
Sent: Sunday, May 04, 2008 12:23 PM
To: Complex2030; Wyka, Ted
Cc: Croessmann, C D; Moy, Ming; Hingorani, Sheryl L; Lee, James; Raglin, Paul (Sandia); Barbour, Charles; Bickel, Thomas; Jenkins, William; Cox, Andrew B; Corbett, David W; Stulen, Rick
Subject: Request for changes to the SPEIS from Sandia National Laboratories

To whom it may concern:

Attached is a formal request for changes to the SPEIS from Sandia National Laboratories associated with our Annular Core Research Reactor (ACRR). One attachment specifically requests changes to the SPEIS and the other attachment is a request to changes to the supporting PEIS business case. Please let me know that you have received this change request and if you have any questions regarding the changes. I can be reached by email at dwcorbe@sandia.gov and by phone at (505) 844-3310.

Regards,

Dave Corbett

David W. Corbett, P.E.
Chief Operating Officer, Nuclear Weapons Strategic Management Unit
Director, Nuclear Weapons Planning, Operations and Integration Center
Sandia National Laboratories
dwcorbe@sandia.gov
(505)844-3310

6/4/2008

Corbett, Dave
Page 2 of 5

PC_507

Comments to the Draft Complex SPEIS

These comments are directed to correct some of the information in the SPEIS and clarify the document so it is in line with the business cases presented by a separate review group. This would improve the document so that a new security Hazard Category III facility could be built at either SNL or NTS to house the ACRR while a dedicated security Hazard Category I facility could be built at the NTS to support device tests, should that ever happen again.

Chapter 3 – Alternatives

1. **Table 3.12-2, ETF Closures for Consolidation in Place Alternative. This table shows the premature closure of the Auxiliary Hot Cell Facility, the Low Dose Rate Gamma Facility, and the Sandia Pulsed Reactor. They should all be removed from the table. If this represents an end condition in 2030, it may be correct. However the status of these facilities are:**
   - **Auxiliary Hot Cell Facility – Essential through FY2017 to continue the inventory of Category 3 NDU and other materials at SNL. If this is shut down, it will preclude removal of materials above, to include TRU materials creating a major concern and potential for fines with the state of New Mexico.**
   - **Low Dose Rate Gamma Irradiation Facility – This facility is an extremely low cost facility that is applied to characterize long term exposure (INRAD) of nuclear weapon components and space application components. While usage varies, it was applied extensively to the recent W76-1 LEP. This facility should not be closed, but placed in a cold standby mode for the RRW family of weapons that must be developed.**
   - **Sandia Pulsed Reactor – The status of this reactor is absolutely dependent on the success of the Qualification Alternatives for Sandia Pulsed Reactor (QASPR) project that is applying modeling and simulation to predict the response of weapon components to meet weapon reliability criteria. The date that that decision will be made no earlier than 2012, based on funding, therefore it would be inappropriate to D&D this facility. In addition, the facility is now supporting a small critical assembly reactor that will be applied to support the National Nuclear Criticality Safety Program and research for NE and RW through at least 2014. It is premature to D&D.**

1|2J
2|6E

2. **Page 3-116, line 2, revise sentence to "…(1) an ACRR-like facility (replacing SNM testing capability lost at SNL); …"**

3. **Table 3.12-4, ETF Closures for the SNL Consolidation Alternative. The same correction as for #1 above.**

4. **Page 3-141, last line, revise to "…NNSA would evaluate building replacement SNM testing facilities at NTS."**

Corbett, Dave
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Chapter 5 – Environmental Impacts

5. **Table 5.17-1 – ETF Closures for Consolidate-in-Place Alternative. The same correction as for #1 above.**
6.
7. **Page 5-496, para 5.17.4.1.4, second line, revise sentence to "…(1) an ACRR-like facility (replacing SNM testing capability lost at SNL); …"**

1|2J (cont)
2|6E (cont)

8. **Page 5-497, second paragraph, second sentence, replace with "The ETF Consolidation at NTS Alternative would require the construction and operation of a dedicated LEU TRIGA reactor at NTS to support the limited physics package testing requirements."**

   Comment: This wording will enable the focused testing for physics packages at the NTS while not precluding a fair Critical Decision milestone to determine where the best location, SNL or NTS, is to build a replacement reactor to support the 99.99% of testing that only requires Category III security current conducted at SNL. This statement is also consistent with the ETF business cases developed.

9. **Table 5.17-11 – Facilities to Close for ETF Consolidation at SNL Alternative. The same correction as for #1 above.**

Corbett, Dave
Page 4 of 5

PC_507

Comments to the Independent Case Business Analysis of Major Environmental Test Facilities for the Nuclear Weapon s Complex, draft dated December 2007.

3|11A

The business case as laid out provides an excellent picture of the options for the paths forward. However, it does not address that there is a need to replace the ACRR facility either at SNL or NTS in the immediate future. It clearly states the best course of action is to build a new, small, LEU TRIGA reactor at the NTS for SNM testing. This misses the point that the current ACRR facility is 44 years old and will require replacement prior to 2030. The determining factor should be the Critical Decision process within DOE to analyze the business cases to see if the new facility should be built at SNL or NTS and since there is an excellent business case to support both a new facility at SNL and the TRIGA facility at NTS, that decision should not be eliminated in the PEIS.

To accomplish this change, the following suggestions are made:

1|2J (cont.)

1. Page vi – Alternative 2B, change to "This alternative downsizes-in-place, with all new SNM…"
2. Page vi – Alternative 2C, change to "….new SNM testing facilities to replace ACRR at either SNL or NTS and LLNL Building 334 at NTS."
3. Page vi – Alternative 3D, change to "….provides a replacement reactor for ACRR either at SNL or NTS…"
4. Page 1-4, line 16, delete ", if at all"
5. Page 1-10, line 2, add "Additionally, the modeling and simulation capabilities at SNL necessary to predict the performance of non-nuclear weapon components in normal, abnormal, and hostile environments are critical to the understanding, development, and certification of the stockpile where the ETF are the essential factor.
6. Page 2-2, lines 14-15, replace with "Facilities at SNL, such as Saturn, HERMES III, and the large underground centrifuge are unique and may need to remain in place with upgrades. Unique nuclear facilities, such as ACRR, are current located in old facilities that will require replacement in the near future to meet today's nuclear facility design criteria and experiment requirements. …."
7. Page 3-3, line 1, replace with "… There are no current plans to replace them before 2030, although some may require replacement, substantial upgrades, or equipment …."
8. Page 3-3, Table 3-1, add for ACRR at SNL the word "New" to account for the need to replace the ACRR facility.
9. Page 3-4, line 16, change to "…decisions may require…"
10. Page 3-6, Table 3-2, ACRR line, change "Move[a]" to "New" in the SNL column, and change "New" to "New[a]" in the NTS line.
11. Page 3-9, Table 3-3, ACRR line, change "Move[a]" to "New" in the SNL column, and change "New" to "New[a]" in the NTS line.
12. Page 3-11, footnote 2, add to end of footnote "…the NTS, although it is acknowledged that the ACRR will need to be replaced in the near future at either SNL or NTS.

Corbett, Dave
Page 5 of 5

PC_507

1|2J (cont.)

13. Page 3-12, Alternative 3C, line 10, change to "…work at SNL and would require replacement in the near future."
14. Page 3-13, line 7, add "…already in place. Again, the replacement reactor would be a dedicated LEU-TRIGA design for dedicated SNM testing, while ACRR would require evaluation and replacement at either SNL or NTS. It also requires…"

3|11A (cont.)

It is not clear if these simple changes to ensure the PEIS allows for a new ACRR facility at either SNL or NTS will impact the cost analysis. In the baseline submission SNL attempted to make clear that the ACRR would require replacement in the near future and provide a cost estimate. It seems that the only estimate that was used was for the small, LEU, TRIGA at the NTS. The only real change this new information would drive is the addition of the new facility cost to every option which is a wash. However, if the Critical Decision process determines that the NTS is the best location, then there would be a difference between building a major new facility there versus the small, dedicated reactor.

1|2J (cont.)

Finally, the schedule that was developed to support the business case shows the following items.

656	ACRR, evaluate alternatives to move or rebuild at SNL	1/2/14 to 7/7/14
722	ACRR Construction at NTS or Rebuild at SNL	7/8/14 to 6/8/18
755	Close ACRR at SNL	6/11/18 to 6/9/20

This schedule "infers" that a simple TRIGA reactor is built at NTS and eliminates SNL from the discussion. That is because with the current DOE construction process coupled with the construction of a nuclear facility, a replacement facility could not be completed at either SNL or NTS in the brief period of time allowed, only the TRIGA facility at NTS.

A suggested improvement, based on the developments of recent nuclear facility construction at both Y-12 and LANL that may add more realism to the schedule, would be:

656	ACRR, evaluate alternatives to move or rebuild at SNL	1/2/11 to 7/7/11
722	ACRR replacement construction at either SNL or NTS	7/8/11 to 6/8/18
755	Close ACRR at SNL, move to replacement facility	6/11/18 to 6/9/20
new	TRIGA Construction at NTS, if required	7/8/14 to 6/8/18

This change does three things: 1) The schedule dates are more practical and allows for significant Title 1 and Title 2 design; 2) There is direct alignment to the various alternatives that all indicated a TRIGA reactor at NTS as a possibility; and 3) It clearly points out the a replacement ACRR would be at either SNL or NTS and ACRR would not close without a replacement facility since the TRIGA is not adequate to meet the stockpile testing suite of needs.

Corbin, V Diane
Page 1 of 1

PC_1250

Levens, Matthew

From: V Diane Corbin [amorgan@intenet49.com]
Sent: Thursday, March 27, 2008 7:01 PM
To: ComplexZ030
Subject: NO NUCLEAR WEAPONS!

V Diane Corbin
4843 N. Thesta St.
Fresno, CA 93726-0346

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A We do not need nuclear weapons. If we start building them every other country in the world will also start. Then what will happer? The whole earth will be nuked and there will be no more people. Neither will there be animals, food, drinking water and on and on. Even the richest people will not be able to preserve themselves! Look at some of the
2|1K pictures of Hiroshima and Nagasaki! Nuclear weapons will destroy this planet! Anyone who does not understand this is as idiotic as Bush!

Sincerely,

V Diane Corbin

Corker, Bob
Page 1 of 1

PC_166

BOB CORKER
TENNESSEE
http://www.corker.senate.gov/

United States Senate

185 Dirksen Senate Office Building
Washington, DC 20510
(202) 224-3344
FAX: (202) 228-0566

Committees:
Armed Services
Foreign Relations
Energy and Natural Resources
Committee on Small Business and Entrepreneurship
Special Committee on Aging

For immediate release:
February 26, 2008

Laura Lefler, 202-224-3467

Statement of U.S. Senator Bob Corker (R-TN)
Member of the Senate Energy and Natural Resources Committee

1|15A "I support the National Nuclear Security Administration's vision to modernize our nation's nuclear weapons complex. I had the opportunity to tour the Y-12 National Security Complex earlier this month and came away impressed at the vital role it has played in our country's security over the past 65 years. I support NNSA's proposed plan
2|5C to maintain a uranium center of excellence at the complex in Oak Ridge. We believe this plan will save our country money while improving the safety and security of the complex, and we look forward to watching the progress at Y-12 as this plan is implemented."

###

Cornejo, Robert

Page 1 of 1

PC_421

Levens, Matthew

From: cornejovox [cornejovox@mac.com]
Sent: Monday, March 17, 2008 11:35 PM
To: Complex2030
Cc: Loulena
Subject: Modernizing Lab for Nuclear Testing

Re: proposed new nuclear weapons research at Lawrence Livermore National Laboratory

1|16A 2|14O 3|7J For whatever it is worth, I am completely against this proposal. I moved out to Tracy unaware of these issues regarding Lawrence Livermore Lab and Site 300, particularly Site 300. Since I have discovered the mess that Site 300 is in, and its affect on the environment, and what I believe is a toxic imposition on the citizens of Tracy, I HAVE MOVED BACK TO SAN JOSE. In our day and age, people just don't have the time of energy to fight these kind of battles, thank God for Tri-Valley Cares and other organizations in opposition to this. Everyone I spoke with in Tracy, although unable to fight the good fight, was completely opposed. Stop the proposals for future entrenchment, and GO AWAY to some location FAR from our communities.

Robert Cornejo

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Cornelius, Alida

Page 1 of 1

PC_359

Levens, Matthew

From: Alida Cornelius [mamasayssing@mac.com]
Sent: Thursday, February 14, 2008 12:51 PM
To: Complex2030
Subject: Citizen Comment regarding SPEIS, Complex Transformation

Mr. Wyka:

1| 14M.3 WHAT ARE YOU GOING TO DO WITH THE WASTE FROM THE POWER PLANTS?????? SEND IT TO MARS?

YOU PEOPLE ARE IDIOTS.

PASS A LAW INSTEAD WHICH REQUIRES ALL HOUSES TO BE BUILT "GREEN", WITH WIND TURBINES, SOLAR PANELS AND OTHER GREEN CONSTRUCTION TO BEGIN WITH.

THE ARCHITECTS AND BUILDERS IN THIS COUNTRY NEED TO BE EDUCATED IN BUILDING GREEN.

2|9B THE EARTH IS SO SMALL.....YOU CAN'T FIND ANYMORE PLACES FOR NUCLEAR WASTE.

MANDATORY BUILDING CODES WOULD BE A BETTER START.

GRANTS TO UNIVERSITY'S ARCHITECT DEPARTMENTS TO TEACH THE PEOPLE TO BUILD GREEN.

FUND RESEARCH FOR ALTERNATIVE FUELS FOR POWER PLANTS.

OR BUILD IT IN YOUR NEIGHBORHOOD, OR BETTER YET, ON AN EARTHQUAKE FAULT!!!!

The decision to transform the U.S. nuclear complex must reflect the will of the American people, 79% of which want that the U.S. to do more to eliminate nuclear weapons. Simply put, the Department of Energy should be putting their resources into nuclear cleanup and "green" energy research, not expanding their weapons program.

3|8A; 4|5C.1 It is particularly disturbing that, in the face of Congress' recent rejection of the Reliable Replacement Warhead program, the SPEIS still refers to a goal of creating 120-125 new warheads every year. These new warheads are not only unwanted, they are also unnecessary. Last year, the Jason's reported that the current U.S. nuclear stockpile will remain reliable for at least another 70 years.

5| 14M.3 (cont.) ; 6|9H There is no reason to rush into a costly new program to build unnecessary and unwanted nuclear weapons ? especially before congressional and administration mandated nuclear policy reviews are completed. With so many unresolved issues around nuclear waste storage, employee safety and compensation, as well as the popular will for reducing nuclear weapons it doesn't make sense for U.S. taxpayers to invest in a new generation of nuclear weapons facilities.

Alida Cornelius
150 Broadway Street
Madison, IN 47250

1

Corwin, Matt
Page 1 of 1

PC_1814

Levens, Matthew

From: Matt Corwin [ninpomikkyo@hotmail.com]
Sent: Sunday, March 30, 2008 8:03 PM
To: Complex2030
Subject: Reject "Complex Transformation" plan to build nuclear weapons

Matt Corwin
1362 E 27th St
Oakland, CA 94606-3267

March 30, 2008

Theodore A Wyka
Complex 2030 SEIS Document Manager
Office of Transformation, U.S. Department of Energy, NA-10.1 1000 Independence Avenue, SW.
Washington, DC 20585

Dear Theodore Wyka:

The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal.

1|16A I am a voter and taxpayer and am completely opposed to the Complex Transformation proposal. Complex Transformation is expected to cost upward of $150 billion and is a waste of taxpayer money. Revamping the current arsenal could also lead to renewed nuclear tests. The world needs fewer, not more, nuclear weapons. Creating more or "redesigning" our current stockpile is hypocritical given the Bush administration's current rhetoric. Don't waste my money helping prepare to kill people!! Use it to help people!!

2|1J By building up its nuclear arsenal right now, the US is essentially telling the world, "Do as I say, not as I do."

Sincerely,

Matt Corwin
510-536-3242

1

Coss, David
Page 1 of 4

PC-969

City of Santa Fe, New Mexico

200 Lincoln Avenue, P.O. Box 909, Santa Fe, N.M. 87504-0909

David Coss, *Mayor*

Councilors:
Miguel M. Chavez, Mayor Pro Tem, Dist. 3
Patti J. Bushee, Dist. 1
Chris Calvert, Dist. 1
Karen Heldmeyer, Dist. 2
Rebecca Wurzburger, Dist. 2
Carmichael A. Dominguez, Dist. 3
Matthew E. Ortiz, Dist. 4
Ronald S. Trujillo, Dist. 4

March 4, 2008

Thomas P. D'Agostino
Administrator
National Nuclear Security Administration
U.S. Department of Energy
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Administrator D'Agostino:

1|16A Over the last several years on numerous occasions, the Governing Body of the City of Santa Fe has expressed the desire to promote nuclear disarmament through the Mayor's Peace Initiative for Cities for Peace and the need to prevent further health and environmental hazards related to nuclear weapons for the citizens of Northern New Mexico. Therefore, on February 13, 2008 the Governing Body of the City of Santa Fe adopted Resolution No. 2008- 17 declaring its objection to the NNSA's Nuclear Weapons Complex Transformation. The Resolution is attached. The Governing Body objects to the expansion of nuclear weapons activities and increases in plutonium pit production. The Resolution calls for the withdrawal of the Complex Transformation Supplemental Programmatic Environmental Impact Statement until after the 2009 Nuclear Posture Review is completed.

Sincerely,

David Coss
Mayor
City of Santa Fe

Coss, David
Page 2 of 4

CITY OF SANTA FE, NEW MEXICO

RESOLUTION NO. 2008- 17

INTRODUCED BY:

A RESOLUTION

OBJECTING TO PROPOSED NUCLEAR WEAPONS COMPLEX "TRANSFORMATON" ACTIVITIES AT THE LOS ALAMOS NATIONAL LABORATORY, INCLUDING EXPANDED PLUTONIUM PIT PRODUCTION; AND DIRECTING THE CITY CLERK TO INFORM FEDERAL AUTHORITIES OF THE OBJECTIONS.

WHEREAS, the National Nuclear Security Administration (NNSA), the Department of Energy's semi-autonomous nuclear weapons agency, has released a draft *Complex Transformation Supplement Programmatic Environmental Impact Statement* in order to implement its plans to transform its nuclear weapons complex, including the Los Alamos National Laboratory (LANL); and

WHEREAS, planned "transformation" of the nuclear weapons complex will expand nuclear weapons activities across the nation, most particularly at LANL; and

WHEREAS, nuclear weapons activities at Los Alamos were previously expanded in 1999, but now LANL has been designated the nation's permanent production center for up to 80 plutonium pits per year, with related increases in hazardous and radioactive wastes; and

1

Coss, David
Page 3 of 4

WHEREAS, plutonium pits are used as the "triggers" for weapons of mass destruction and plutonium creates health and environmental hazards; and

2|14K1 **WHEREAS**, the governing body of the City of Santa Fe does not support the creation of further health and environmental hazards related to nuclear weapons for the citizens of Northern New Mexico; and

3|14E3 **WHEREAS**, LANL has released radioactive and hazardous contaminants into the Espanola Basin Aquifer, designate by EPA as a Sole Source Aquifer, and groundwater monitoring wells at LANL are not reliable because of drilling methods known to mask contaminants; and

WHEREAS, it is declared the policy of the City, through previously adopted resolutions, to promote nuclear disarmament through the Mayor's Peace Initiative for Cities for Peace; and

WHEREAS, the governing body has previously passed Resolution No. 2003-64 and 2006-104 opposing expansion of "pit" facilities construction at LANL; and

WHEREAS, the governing boy has also previously passed Resolution No. 2005-39 supporting compliance by the United States with the treaty on nonproliferation of nuclear weapons; and

3|5C1 **WHEREAS**, independent experts have found that plutonium pits have reliable lifetimes of a century or more, thus making production unnecessary to begin with; and

4|1C **WHEREAS**, NNSA claims that it must transform its nuclear weapons complex to meet the requirements of President Bush's 2001 "Nuclear Posture Review," but Congress has required the incoming president to complete a new Review in 2009; and

WHEREAS, the new Nuclear Posture Review by a new president could have impacts on the nuclear weapons complex and LANL significantly different from the old Review,

NOW, THEREFORE, BE IT RESOLVED BY THE GOVERNING BODY OF THE CITY OF SANTA FE that the governing body hereby states its objection to NNSA's *Complex*

2

Coss, David
Page 4 of 4

1|16A1 (cont)

Transformation Supplemental Programmatic Environmental Impact Statement and resolves that it be withdrawn until after the 2009 Nuclear Posture Review.

BE IT FURTHER RESOLVED that the governing body hereby states its objection to the expansion of nuclear weapons activities at the Los Alamos National Laboratory, including further increased plutonium pit production.

BE IT FURTHER RESOLVED that the governing body directs the City Clerk to send copies of this resolution to our congressional delegation, our governor, the Department of Energy and the National Nuclear Security Administration.

PASSED, APPROVED and ADOPTED this 13th day of February, 2008.

David Coss

DAVID COSS, MAYOR

ATTEST:

Yolanda Y. Vigil

YOLANDA Y. VIGIL, CITY CLERK

APPROVED AS TO FORM:

FRANK D. KATZ, CITY ATTORNEY

mdb/R/Resolutions 2008/Plutonium

3

Costello, Jim
Page 1 of 1

PC_1630

Levens, Matthew

From: Jim Costello [jcostello@igc.org]
Sent: Saturday, April 05, 2008 10:35 PM
To: Complex2030
Subject: I Oppose the Production of New Plutonium Pits

Dear Mr. Wyka,

1|16A As someone who embraces a vision of a world free of nuclear weapons, I am troubled that the Complex Transformation plan centers around the production of new nuclear warheads. We need pursue disarmament, not build up our stockpiles.

2|2O One of the most troubling aspects of the ?Complex Transformation? process is that it would lead to the production of new nuclear warheads in the absence of a national debate on nuclear weapons policy.

1|16A (cont.) Please take practical steps toward building a world without nuclear weapons.

I am also sending a copy of this letter to the members of my Congressional delegation.

Jim Costello
1849 Richard Way
1849 Richard Way
Ceres, CA 95307

1

Costner, Darlene

Page 1 of 1

PC_1319

Levens, Matthew

From: Darlene Costner [darcostner@yahoo.com]
Sent: Tuesday, April 15, 2008 5:17 PM
To: Complex2030
Subject: Bush's Proposal to Produce Plutonium Pits for Nuclear Weapons.

Darlene Costner
7759 E. Hawthorne St.
Tucson, AZ 85710-1602

April 15, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|1J It is the height of insanity to develop more nuclear weapons. The U. S. should be leading the world in disarmament instead of heating up another cold war.

2|7J We still haven't solved the problem of what to do with the waste from nuclear energy and until we do we should never create more.

3|3A We have the capability of destroying the world now; how many more nuclear weapons do we need? Will this stupidity continue until we actually do blow up our planet?

4|9A Even if we never use the weapons (God forbid that we would), the cost of developing and storing them would go a long way toward working for peace.

President Eisenhower was right when he warned us to beware of the military/industrial complex.

Please show some common sense and deny Bush the money for this misbegotten project.

Sincerely,

Darlene Costner
520-722-8858

1

Coulson, Iain

Page 1 of 1

PC_505

Buenaflor, Justin

From: imc@jach.hawaii.edu
Sent: Wednesday, March 19, 2008 6:26 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Theodore Wyka, Complex Transformation SPEIS Manager Office of Transformation, NA-10.1 U.S. Department of Energy/NNSA Washington, DC 20585

Dear Mr. Wyka,

1| 13A.1 The US has thousands of nuclear weapons; we do not need any more or any new ones. 'Complex Transformation' undermines efforts to stop the spread of nuclear weapons around the world. Nuclear weapons create a false - and temporary - sense of security for those who have them at any time.

Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE should focus on shrinking the still-oversized nuclear weapons complex and on maintaining the safety and security of our existing weapons arsenal as the size of our nuclear stockpile is reduced.

Sincerely,
Iain Coulson
PO Box 1104
Keaau, HI 96749-1104

1

Couret, Holly
Page 1 of 1

PC_1989

Levens, Matthew

From: Holly Couret [merristar@yahoo.com]
Sent: Wednesday, April 30, 2008 12:22 PM
To: Complex2030
Subject: nuclear power

Holly Couret
208 Fig Ave
Fairhope, AL 36532-1415

April 30, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A Please refrain from pursuing the nuclear path unless, or until, a truly safe way of disposing nuclear waste is discovered. Burying it underground, or sending it out into space, are NOT viable alternatives.

2|9B When as much time and money as we spend on nuclear projects goes into research to find safe and sustainable energy alternatives, our energy problems will be solved in a manner that supports life on this planet into the future.

Until then, we need to focus on living within our energy means without adding more poisons to out world.

Sincerely,

Holly Couret
251-928-1010

1

Covarrubias, Moises
Page 1 of 1

PC_1165

Levens, Matthew

From: Moises covarrubias [mocomoe@hotmail.com]
Sent: Thursday, March 27, 2008 6:13 PM
To: Complex2030
Subject: Reject "Complex Transformation" plan to build nuclear weapons

Moises covarrubias
22831 Shadowridge ln
Moreno Valley, CA 92557-2634

March 27, 2008

Theodore A Wyka
Complex 2030 SEIS Document Manager
Office of Transformation, U.S. Department of Energy, NA–10.1 1000 Independence Avenue, SW.
Washington, DC 20585

Dear Theodore Wyka:

1|16A The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal.

2|1J; 3|9H; 4|14O The transformation is suppose to cost taxpayers billions and billions of dollars. It will also require new nuclear testing. This of course will prove to be hazardous to our environment.
According to the complex plan it's proposed that the number of plutonium pits we produce as a nation will increase. This will add to our environmetal contamination when the DOE should be cleaning up their radioactive waste not adding to it.
Along with the above reasons we just need to be an example to the rest of the world and practice what we preach. If we ask nations like Iran and North Korea to stop their nuclear weapons programs and then turn around and agressively develop ours we are sending the wrong message.

By building up its nuclear arsenal right now, the US is essentially telling the world, "Do as I say, not as I do."

Sincerely,

Moises covarrubias
949-290-0691

1

Cox, Alan
Page 1 of 1

PC_911

March 28, 2008

U.S. Dept of Energy
Theodore Wyka, NA-101
Complex Transformation Comment

Dear Mr. Wyka,

I strongly oppose the DOE's Complex Transformation Plan. Do not build more nuclear bombs ever!

1|16A

Please honor the Nuclear Non-Proliferation Treaty!

2|1F

Sincerely,

Alan Cox
789 Fisa Lane
Ashland, OR 97520

Coyle, Mary Ann
Page 1 of 1

PC_1153

Levens, Matthew

From: Mary Ann Coyle [macoyle303@comcast.net]
Sent: Thursday, March 27, 2008 6:48 PM
To: Complex2030
Subject: Withdrawal of NNSA's Complex Transformation PEIS

Attn: Mr. Theodore Wyka

Dear Mr. Wyka:

1|4A As I review the NNSA's Complex Transformatior PEIS, it seems to me that no action should be taken until after a new administration is elected in the United States. It is

2|9H important that NNSA not act to expend taxpayer monies until a new administration has issued its own Nuclear Posture Review. It is my understanding that the weaponry currently possessed by the US is sufficient. I am personally opposed to employing nuclear weapons as immoral and unjustified in this age. We above all should recognize that war is totally

3|16A unjustified when nations are equipped with nuclear arms. Diplomacy and non-violent dialogue are now the only way for nations to co-exist in freedom. Please stop the maddness. Sincerely, Mary Ann Coyle (member of Sisters of Loretto)

Crabtree, Rebecca
Page 1 of 1

PC_424

Levens, Matthew

From: Crabtree, R Shea (RP2) [crabtreers@y12.doe.gov]
Sent: Thursday, February 28, 2008 7:24 AM
To: Complex2030
Subject: Draft Complex Transformation SPEIS

1|15A I fully support the preferred option.

Distributed Centers of Excellence

Rebecca Shea Crabtree

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Craig, Julia
Page 1 of 1

PC_568

Buenaflor, Justin

From: Julia Craig [jrdcraig@lmi.net]
Sent: Saturday, March 15, 2008 5:36 PM
To: Complex2030
Subject: nuclear weapons

Julia Craig
2337 Parker St. #7
Berkeley, CA 94704-2841

March 15, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I strongly oppose the president's plan to make more nuclear weapons. He wants to build a new plant, and to rebuild other plants. I think that the Congress shoul oppose money for any work on nuclear weapons.

Sincerely,

Julia Craig
510-649-8904

1

Craigs, John
Page 1 of 2

PC_2013

Levens, Matthew

From: John [craigs1965@hotmail.com]
Sent: Sunday, April 20, 2008 5:50 PM
To: ComplexZ030
Subject: LLNL Transformation

Dear Mr. Wyka,

As part of complex transformation, NNSA first needs to undo the mess your agency created at LLNL when you basically forced the University of California (UC) to bid on the LLNL contract as a private LLC. The RFP for the LLNL contracted was crafted by NNSA so as to take away all inherent advantage that UC had over private company bidders. Prior to the RFP going final, the prospective private sector bidders complained that they could not match the cost savings of UC's tax-exempt status nor the UC retirement system - so the RFP was changed. All of the factors that gave UC a natural advantage of private sector bidders were either removed from the RFP or NNSA decided not to use them as selection criteria.

As discussed in the editorial below, the cost of operating LLNL is now $280 million more than when UC ran LLNL alone. Even if you remove the management fee of $46 million, that still leaves $234 million. So if the RFP had not been written by NNSA to "level the playing field" the other bidder (a Northrup-Grumman led team) would have submitted a bid with over $200 million more in cost compared to a UC only bid (in the form of a solely UC owned LLC).

Clearly a UC only bid would have been able to show in its proposal that it was the most cost effective bid. UC could have brought in the same industrial companies that make up Lawrence Livermore National Security, LLC as sub-partners - similar to the approach the University of Chicago took on the Argonne Lab contract. Under a UC only bid, LLNL would not have lost its public tax exempt status and LLNL employee retirement/medical cost would not have sky rocketed. Strangely, NNSA's RFP for LLNL punished UC for its natural advantages, while the DOE RFP for LBNL did not. In other words, the LBNL RFP gave UC no incentive to create a private LLC and it did not, however UC still won that contract. Also keep in mind that LLNL and LBNL are more similar as far as the issues that drove LLNL's cost to $200 million - tax status and employee benefit changes. LLNL is not a close of Los Alamos Lab. The improvements that the industrial partners have brought to LLNL have been minimal compared to those at LANL - also most all of the operational hazards at LLNL are going away with the decision to remove SNM in the next few years. Soon LLNL will look more like LBNL than LANL. 1|20

NNSA needs to look into this matter, and take a hard look at the RFPs for LLNL and LBNL, and compare the contracting processes and subsequent operating cost. The mess at LLNL was both predictable and avoidable. Unfortunately for LLNL employees and the American taxpayer, NNSA with its unfair contracting process dug the hole that now both finds themselves in.

Contra Costa Times

Livermore lab job losses a blow to area economy Editorial
04/19/2008

The corporate management of the Lawrence Livermore Laboratory, which began Oct. 1, is not working. For the third time this year, the staff is being reduced to the point that the future of the lab is in jeopardy.

In May, the new lab management contract for a consortium of private businesses led by the University of California and Bechtel Corp. was announced amid much optimism.

Lab director George Miller predicted a smooth transition. He said new efficiencies, attrition and other changes would save enough revenue to prevent layoffs.

Craigs, John
Page 2 of 2

PC_2013

He was dead wrong. Slightly more than a month after the consortium took the helm of the lab, it announced 500 layoffs of temporary and support employees, which took place in January.

In March, 215 permanent employees took buyouts. Others retired or left and were not replaced. In fact, 900 employees, most of them highly skilled, have left the lab this year. But it still isn't enough, according to Miller.

The latest announcement of staff reductions was made Tuesday. As many as 535 more employees could be cut. This time the layoffs would be involuntary and would affect permanent career employees.

What went wrong with predictions of no layoffs? The most benign answer is that the consortium simply underestimated the increased costs associated with corporate management.

Originally, the corporation formed by UC, Bechtel and several other companies to run the lab expected about $80 million in increased costs. The actual cost increase is $280 million. So much for efficiency or accuracy in financial projections.

Most of the additional costs — $200 million — is the result of the lab's loss of the tax-exempt status it had under UC management.

The yearly management fee was increased from $8 million to $46 million. Also, retirement and health benefit costs have been higher than estimated.

We are a bit skeptical that a supposedly skilled management team could be unintentionally so far off in estimating increased costs, especially considering the size of the cost of losing tax exemptions. It is also suspicious that so many staff reductions have come so quickly.

We were supportive of the management changes in the wake of security lapses and financial errors at the Livermore and Los Alamos labs, which were run solely by UC. 1|20 (cont)

However, with such rapid shrinkage of the Livermore lab's staff, we now have cause to think the federal government made a mistake in seeking bids for new management instead of pushing for changes within UC's managers.

The loss of so many skilled employees at the Livermore lab reduces its productivity and makes it a less desirable place to work.

Lack of job security at a financially troubled facility is likely to make it far more difficult to attract the top talent that has been the foundation of the lab's success over the years.

Making matters worse, the federal government has been less than generous in funding the lab in the past few years.

With diminished funding, higher than forecast costs and a declining work force, the Livermore lab faces an uncertain future that could be a painful loss for the East Bay economy.

http://www.contracostatimes.com/opinion/ci_8589164

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http://www.windowslive.com/skydrive/overview.html?ocid=TXT_TAGLM_WL_Refresh_skydrive_packup_042008

Crevelli, John
Page 1 of 1

PC_1778

Levens, Matthew

From: John Crevelli [j75crevelli@yahoo.com]
Sent: Friday, March 28, 2008 1:16 PM
To: Complex2030
Subject: Nuclear Weapons in Our Future

John Crevelli
670 Alta Vista Dr.
Healdsburg, CA 95448-4651

March 28, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I fear that proposals now being made to build plutonium pits for nuclear weapons and to modify nuclear facilities may open pandoras box wider for acceleration of our nuclear weaponry.

1|16A (cont) We do not need new nuclear plants and intensifed interest in nuclear warhead production. Our economy would not sustain these actions in an era when our national debt is already 2|9B disasterously high. It would be a disaster to send a message of belligerence to the world after our already tarnished reputation in Iraq and our saber rattling over Iran. We would deny Iran's development of nuclear capacity but grant a green light to our own program. 3|1J This makes no sense at all.

1|16A (cont) When will we follow some common sense in our policies that can only be conceived by the world as an arrogance of power? We should reject any attempts to upgrade our nuclear arsenal. How much more kill power must we demonstrate?

Sincerely,

John P. Crevelli
707 433-4534

1

Crews, Carole
Page 1 of 1

PC_1350

Buenaflor, Delight

From: Carole Crews [seacrews@taosnet.com]
Sent: Friday, April 04, 2008 1:11 PM
To: DIV.Complex.Transformation
Subject: send button doesn't work!

Dear Sir, I just spent ten minutes writing a comment only to find that the send button on the page where you ask for comments does not respond. Mean trick! I called and left a message instead, but they are probably deleted before they are heard because I'm sure no thinking, feeling human being wants more Weapons of mass Destruction manufactured in their own back yard, upwind of their homes and gardens. Please fix your machinery so people can let their views be known before the deadline. No wonder people believe in the conspiracy theories.....

Peace, Carole Crews

1|16A

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Cronin, Jerry
Page 1 of 1

PC_1383

Levens, Matthew

From: Jerry Cronin [jspcronin@yahoo.com]
Sent: Tuesday, April 29, 2008 5:19 PM
To: Complex2030
Subject: Stop the Nuke Madness

Jerry Cronin
3728 Maya Drive
Gallup, NM 87301-4561

April 29, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

Dear Senators-

1|9B I am VERY opposed to the Bush administrations on-going genocide of the Dine' People through the re-introduction of uranium mining. Presidentof the Dine' people Joe Shirley has repeatedly spoken out against it yet these folks blindly plow ahead and force this monstrosity on the Navajo People. How about spending some of that money on water infrastructure instead?

2|14O We live close to the largest toxic spill of uranium in the history of the world. How do you think we feel when we hear that the very same companies that perpetrated this crime against humanity historically are being allowed to come back and do it again? This madness MUST stop! Peace- Dr. Jeryr Cronin

Sincerely,

Jerry Cronin. Ph.D.
505-863-6208

1

Crossno, Patsy
Page 1 of 1

PC_427

Levens, Matthew

From: Crossno, Patsy A (VYU) [crossnopa@y12.doe.gov]
Sent: Tuesday, February 26, 2008 9:03 AM
To: Complex2030
Cc: Crossno, Patsy A (VYU)
Subject: SPEIS

Importance: High

Mr. Wyka,

1|15A As a lifelong resident of this area, and longtime employee of the Y-12 Nuclear Weapons Complex, I have come to appreciate the importance of Y-12. The importance of this plant, the location, and most importantly, the knowledge base and its people are of such significance that I cannot put them into words. We have the best lab in the country over the hill, the University of Tennessee 40 minutes away. Our country needs this place, this area needs it, our community needs it. We have the facilities, people and knowledge in place and prepared to move forward as the Uranium Center of Excellence. The community and surrounding
areas are 100% behind us. Y-12 and the work we do helps to protect our country against our enemies. All of us that work at Y-12 are proud to be here, and want to continue with what we do. It would be a tremendous blow to the economy and budget not to mention the progress that has been made, with the modernization, etc., to move our work to another location. We are primed and ready to start. We look forward to continuing on with our work and serving our country. We look forward to new challenges ahead, and will rejoice in conquering them. We MUST continue with our mission. Our freedom and safety depends on it. No one wants to basically start over which is letting our guard down. We have what is needed to continue on here. We want to continue.

Thank you for your time,
Patsy A. Crossno

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Croteau, Mary

Page 1 of 1

PC_426

Levens, Matthew

From: crodo55@yahoo.com
Sent: Sunday, February 24, 2008 11:27 AM
To: Complex2030
Subject: How many more ways can we kill off the world?

Theodore Wyka, Complex Transformation SPEIS Manager Office of Transformation, NA-10.1 U.S. Department of Energy/NNSA Washington, DC 20585

Dear Mr. Wyka,

1|3A The United States still maintains thousands of nuclear weapons; it does not need to design new types or produce new warheads.

2|1F We would be more secure if nuclear weapons are eliminated worldwide. The United States should re-affirm our commitment to a world free of nuclear weapons and publicly pursue that goal.

3|1J This will help prevent other nations from developing nuclear weapons. Complex Transformation plans for producing new plutonium pits--the core of nuclear weapons--undermine these critical national security goals.

We do not need a newer way to nuclear annihilation.

4|7O The DOE needs to abandon its Cold War mindset. The United States can and will maintain a reliable nuclear arsenal for many years and does not need to build new nuclear weapons. The focus should be on shrinking the still-oversized nuclear weapons complex and on maintaining the safety and security of existing weapons as the size of our nuclear stockpile is reduced.

Sincerely,
Mary Croteau
4125 W. Armitage Ave
Chicago, IL 60639

1

Crumby, Amanda

Page 1 of 1

PC_360

Levens, Matthew

From: Amanda Crumby [abcrumby@bellsouth.net]
Sent: Friday, February 22, 2008 3:31 PM
To: Complex2030
Subject: Complex Transformation SPEIS

1|15A
2|5C The purpose of this email is to document my support for the National Nuclear Security Administration's preferred alternative for Complex Transformation is Distributed Centers of Excellence, with Y-12 as the Uranium Center of Excellence.

The Y-12 National Security Complex provides a valuable service for the continued security of the United States and has established a safe operating record. Y-12 should be the Nuclear Weapons Complex site for the Uranium Center of Excellence.

Amanda Crumby
132 Cross Creek Lane
Kingston, TN 37763

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Crumpton, Rhonda

Page 1 of 1

PC_741

Levens, Matthew

From: Sierra Vista Inn [sierravistainn@aol.com]
Sent: Thursday, March 20, 2008 4:46 PM
To: Complex2030
Subject: Tonopah Test Range

Dear Mr. Wyka,

1|16A; 2|10E — I am writing to say that I too am willing to support Joni Eastly, our county commissioner, take a stand against the downsizing or closure of the Tonopah Test Range. I am the property manager for an apartment complex in Tonopah, Nevada. We have 123 units in our complex. The percentages of course vary slightly from month to month as range employees are hired, transferred or buy houses in our area. Presently 25% of our tenants are test range employees. The closure of the Tonopah Test Range would really hurt our complex. 3|18B; 4|18C — The result would be the elimination of 2, maybe 3 maintenance positions and of course thousands of dollars in revenue.

3|18B (cont.) — I am also the chair person for our Salvation Army Tonopah Unit. The closing of the test range would mean our organization would loose 80% of its volunteers from the year around help and 85% of our Christmas volunteers. In fact, this Christmas the employees from the Tonopah Test Range had a toy drive and supplied Salvation Army brand new toys for approximately 100 children that may not have other wise had a Christmas gift to open!

5|14H; 1|16A (cont.) — We are the little town that could! We have struggled with our population and local business for years and have finally had a little breathing room. We are all begging for careful consideration for our home town before there is any downsizing or closures of the Tonopah Test Range. Tonopah is a fantastic place to raise children, out of the city life, influences and crime rates. We have great volunteers in every organization that are employed by the Test Range. Many of our teachers have spouses that are employed by the Test Range. I would be willing to say that every family in Tonopah will be negatively effected by the downsizing or closure; the relocation of friends, family, co-workers, fellow volunteers, church members, and neighbors, not to mention the halt in the growth we are hoping for or the plummeting of the value of our homes and property. Again, I ask you to please look at the alternatives for the sake of our little town that could!

Rhonda Crumpton
Property Manager
P O Box 1789
Tonopah NV 89049
sierravistainn@aol.com
775-482-5368 office
775-482-6998 fax

1

Cruz, Beryl

Page 1 of 1

PC_1833

Buenaflor, Delight

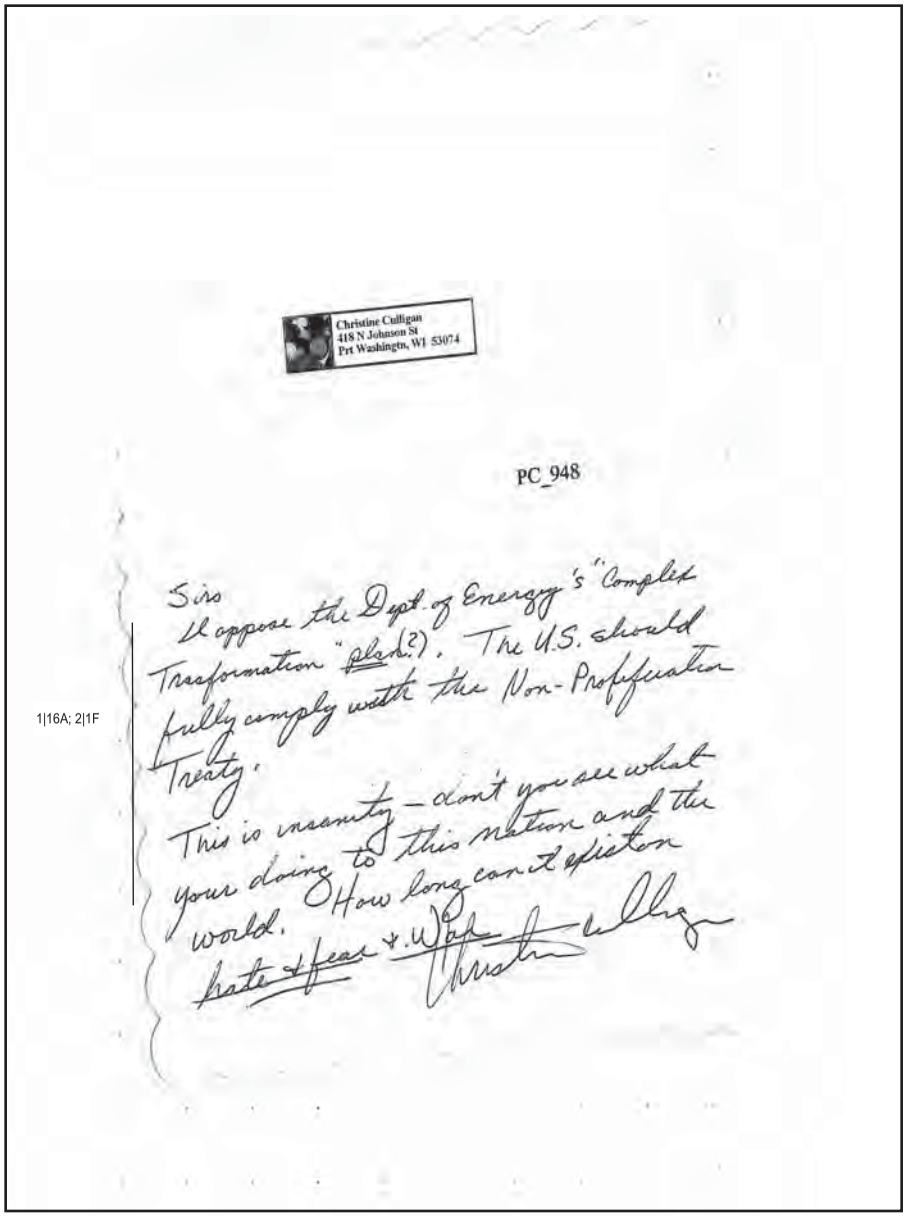
From: Beryl Cruz [bcruz@lanl.gov]
Sent: Thursday, April 10, 2008 12:27 PM
To: DIV.Complex.Transformation
Subject: Form posted from Microsoft Internet Explorer.

Last Name=
First Name=
Email Address=
Street Address=
City=
State=
ZIP Code=

1|10B — Comments=Bectel (out of state white males) will make millions we will be left with the nuclear waste. Los Alamos National Laboratory continues to be a racist place to work. Please investigate this place.

1

Culligan, Christine
Page 1 of 1



Christine Culligan
418 N Johnson St
Prt Washington, WI 53074

PC_948

Sirs
U oppose the Dept. of Energy's "Complex Trasformation "plan"(?). The U.S. should fully comply with the Non-Proliferation Treaty.

1|16A; 2|1F

This is insanity – don't you see what your doing to this nation and the world. How long can it sustain hate & fear + War

Christine Culligan

Cumbow, Kay
Page 1 of 4

PC_1419

Levens, Matthew

From: Kay Cumbow [kcumbow@greatlakes.net]
Sent: Thursday, May 01, 2008 12:19 AM
To: Complex2030
Subject: Comment to DOE

Attachments: Comment to DOE.doc

Comment to OE.doc (41 KE

I am sending comments on Complex Transformation. They are a little late, but I would hope you would consider them. - Thank you. Kay Cumbow

1

Cumbow, Kay
Page 2 of 4

PC_1419

Citizens for Alternatives to Chemical Contamination

Member of the Michigan Environmental Council and
Earth Share of Michigan
8735 Maple Grove Road, Lake, Michigan 48632-9511
Voice and Fax: 989-544-3318

Chapter Organizations:
Huron Environmental Activist League

April 30, 2008

Theodore A Wyka,
Complex 2030 SEIS Document Manager

Citizens for Alternatives to Chemical Contamination (CACC) is a grassroots environmental education and advocacy organization dedicated to the principles of social and environmental justice, pollution prevention, citizen empowerment, and protection of the Great Lakes ecosystem.

1|140 The enormous and long-lasting devastation to both human health and the environment due to construction, testing and use of atomic and hydrogen bombs is so well documented, that it is difficult to imagine further plans for building or testing substances that have the ability to destroy all life on Earth – and not just by exploding these horrific bombs, but by contaminating land, water and air for millennia where the materials used for the bombs are mined, (uranium mining) and milled, processed, enriched, and where the plutonium is made in the reactors and also, where, finally, these bombs are made in the bomb factories, and also, where they are tested. Because nature is not static - and air, water and even land can move, this centuries-long contamination with many radionuclides, many of which bioaccumulate and many of which bioconcentrate, is not confined to any community, but is eventually spread downwind, downstream, aerosolized and carried by storms, by wind, by water to places around the globe. These poisons have contaminated the human, wildlife and plant gene pools.

Plutonium by itself is devastating to humankind. In her book, *Nuclear Madness*, (copyright 1978, 1994), Helen Caldicott documents the toxicity of plutonium to human beings. This is from Chapter 5, p. 80:

"Plutonium is one of the most carcinogenic substances known. Named after Pluto, god of the underworld, it is so toxic that less than one-millionth of a gram (an invisible particle) is a carcinogenic dose.

Cumbow, Kay
Page 3 of 4

PC_1419

One pound, if uniformly distributed, could hypothetically induce lung cancer in every person on earth.* p. 80"...

2|14m.3 "...Plutonium is a chemically reactive metal, which, if exposed to air, ignites spontaneously to produce respirable-sized particles of plutonium dioxide, a compound also produced as a talcum-fine powder during fuel reprocessing. These particles can be transported by atmospheric currents and inhaled by people and animals. When lodged within the tiny airways of the lung, plutonium particles bombard surrounding tissue with alpha radiation. Smaller particles may break away from the larger aggregates of the compound to be absorbed through the lung and enter the bloodstream. Because plutonium has properties similar to those of iron, it is combined with iron-transporting protiens in the blood and conveyed to iron-storage cells in the liver and bone marrow. Here, too, it irradiates nearby cells, inducing liver and bone cancer, and leukemia."

"Plutonium's iron-like properties also permit the element to cross the highly selective placental barrier and reach the developing fetus, possibly causing teratogenic damage and subsequent gross deformities in the newborn infant. Plutonium is also concentrated in the testicles and ovaries where it inevitably will cause genetic mutation to be passed on to future generations and, in some cases, cancer of the testicles." p. 81

3|7J It is also unacceptable that the laboratory/testing areas that have been used to build the bomb in the past are still in desperate need of clean-up, still have volatile, toxic wastes, some of which the D.O.E. has publicly stated they are unable to clean up, such as one place in Rocky Flats. It seems to us, that if the D.O.E. cannot afford to clean up these places, such as Hanford, Rocky Flats, and other laboratories, lands that were used to build and test the bomb, that we certainly cannot afford for them to poison more lands, more waters, more communities. Today, many former workers for the D.O.E., many soldiers and sailors that were guinea pigs in the atomic testing programs, many former uranium miners, many Marshall Islanders, (as well as family members of these individuals and community members, who have been affected as well) are denied compensation for serious health problems, due to working with or exposure to materials used in producing the bombs. A very few have gotten some compensation from the government. When health problems are passed onto the next generations via the gene pool, or due to exposure to the toxic materials used in the production of the bomb via air and water etc., there is never an admission of wrong-doing or need for compensation by the government, no matter how serious the birth defects or health effects may be.

4|16A For these and many other reasons, CACC stands opposed to any new construction or testing of atomic or hydrogen bombs in the United States. We also request a further 90 day extension on this comment period, and would request that the federal government put notices in newspapers in all cities over 20,000 people, so that the general population is aware of this attempt to use our tax dollars to further poison our communities and the land and water.

Cumbow, Kay
Page 4 of 4

PC_1419

Kay Cumbow, Chair
Citizens for Alternatives to Chemical Contamination
8735 Maple Grove Road
Lake, MI 48632-9511

Curley, John
Page 1 of 1

PC_1401

Levens, Matthew

From: jrcurley2000@yahoo.com
Sent: Tuesday, April 08, 2008 8:14 AM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

I think it is good the Department of Energy is planning to re-evaluate our nation's nuclear weapons component.

1|3A Fundamentally, we probably have more than enough nuclear weapons to constitute a reliable and credible nuclear deterrent into the future.

2|9B Our national defense would in these times be better served by protection of our existing nuclear weapons arsenal and negotiations and cooperation with other nations to ensure such weapons don't fall into the wrong hands.

Thank you for allowing me to comment on the "Complex Transformation" project.

Sincerely,
John Curley
50 Old School Rd.
Selkirk, NY 12158

cc:
Senator Charles Schumer
Representative Michael McNulty
Senator Hillary Clinton

Curry, D.
Page 1 of 1

PC_846

Levens, Matthew

From: D. Alan Curry [wintersoldier@yahoo.com]
Sent: Thursday, March 27, 2008 4:40 PM
To: ComplexZ030
Subject: plaguery

D. Alan Curry
99 S. Pearl St.
Albany, NY 12207-1438

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I am strongly opposed to any plans to build any nuclear facilities anywhere in the U.S. Period. Really, haven't nuclear weapons done enough damage to the world already ?

Sincerely,

D. Alan Curry

Curry, Ron
Page 1 of 2

PC_968

NEW MEXICO
ENVIRONMENT DEPARTMENT

Office of the Secretary

BILL RICHARDSON
Governor

Harold Runnels Building
1190 Saint Francis Drive (87505)
P.O. Box 26110, Santa Fe, NM 87502
Phone: (505) 827-2855 Fax: (505) 827-2836
www.nmenv.state.nm.us

RON CURRY
Secretary
JON GOLDSTEIN
Deputy Secretary

March 27, 2008

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager,
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, D.C. 20585

RE: NEW MEXICO ENVIRONMENT DEPARTMENT COMMENTS ON DRAFT COMPLEX TRANSFORMATION SUPPLEMENTAL PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Dear Mr. Wyka:

The New Mexico Environment Department (**NMED**) submits the following comments on the Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement (Complex Transformation SPEIS, DOE/EIS-0236-S4). NMED understands that this SPEIS analyzes the potential environmental impacts of numerous alternatives to "continue transformation of the nuclear weapons complex to be smaller, and more responsive, efficient, and secure in order to meet national security requirements." (Abstract, Cover Sheet to SPEIS Summary, December 2007).

1|4A While these goals may be laudable in general terms, it is in the details to the plans for Los Alamos National Laboratory (**LANL**) that NMED objects. Currently, LANL maintains production capabilities for limited quantities of plutonium components (i.e., pits) for delivery to the stockpile. The SPEIS states that one of the perceived needs for action is to provide adequate production capacity for a presumed smaller stockpile, and assumes the need to develop a manufacturing capacity to produce anywhere from 50 to 125 new weapons annually (Summary, Section S.2.3). NMED supports the No Action Alternative with respect to pit production at LANL.

2|15A Otherwise, NMED supports any alternative that consolidates the complex (including LANL) to be more efficient, and to generate less hazardous and radioactive waste. However, any cost savings realized through this consolidation must be used to fully fund LANL's cleanup obligations to the State.

3|7J

Protecting our Environment, Preserving the Enchantment

Curry, Ron
Page 2 of 2

4|9B1 At a time when the federal government is coming up short on needed cleanup funding at LANL and other Department of Energy (**DOE**) sites, DOE should not even consider increased pit production. DOE has a long history in New Mexico of paying lip service to cleanup, manifested in budget shortfalls in environmental management year after year. This is precisely why NMED put a state-enforceable fence-to-fence cleanup order in place in 2005. DOE and its contractor signed this Order, signifying their pledge to all New Mexicans that they are finally serious about cleanup.

5|14M2 Unfortunately, in the three years since the parties entered into this historic Order, the DOE and the Laboratory have missed several milestones and failed to substantially comply with the technical requirements on several others. NMED recognizes that insufficient budget is an important factor in driving further noncompliance. It is, however, by no means the only factor, as disagreements over technical approach, inadequate project oversight, management breakdowns, and mistakes in execution have emerged as other important factors. To the extent budget shortfalls have been the cause, the solution is simple: increase funding. The milestones in the Order were carefully selected, balancing protection of human health and the environment – NMED's primary interest – with the budget limitations of conducting the needed work at a site with the Laboratory's complexity and scope – DOE and the Laboratory's primary interest. Renegotiating the milestones undermines the interests of New Mexicans who put environmental protection first.

6|14M13 Each year New Mexicans see the overall LANL budget increase; each year the cleanup budget falls further and further short of what is needed to conduct the work. Before it looks at new missions or expanding existing missions, the federal government must meet and fund its cleanup commitments to the people of New Mexico. It is unconscionable that the DOE and its contractors at LANL are even considering funding additional pit production while at the same time refusing to put the required funding towards cleanup. They cannot expect the citizens of New Mexico to continue to potentially be exposed to new pollution when their 60 year legacy of contamination remains unaddressed.

NMED, and the State of New Mexico, are gravely concerned that increased pit production at LANL will only further divert needed funding and management attention from these crucial cleanup activities. For this reason, we strongly oppose any increases in pit production capability, or any expansion of LANL's mission in general. Addressing and correcting LANL's legacy of pollution should be job number one for the lab. It is the lab's legal and moral responsibility to implement the historic 2005 fence-to-fence clean up order quickly and completely.

Sincerely,

Ron Curry
Cabinet Secretary

Curtis, Janet
Page 1 of 1

PC_516

Buenaflor, Justin

From: janet curtis [jan2curtis@aol.com]
Sent: Tuesday, February 19, 2008 4:07 PM
To: Complex2030
Subject: money for warheads

janet curtis
7680 rhinestone circle
reno, NV 89511-1342

February 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|1J Building this new plant would send a contradictory message to other countries, such as Iran, who may be seeking nuclear weapons. While the U.S. is asking others to forego developing nuclear arsenals, we are simultaneously trying to increase our own capacity to build new nuclear weapons. This is dangerous thinking as usual..."On and on the weary litany of purblind negativity proceeds."

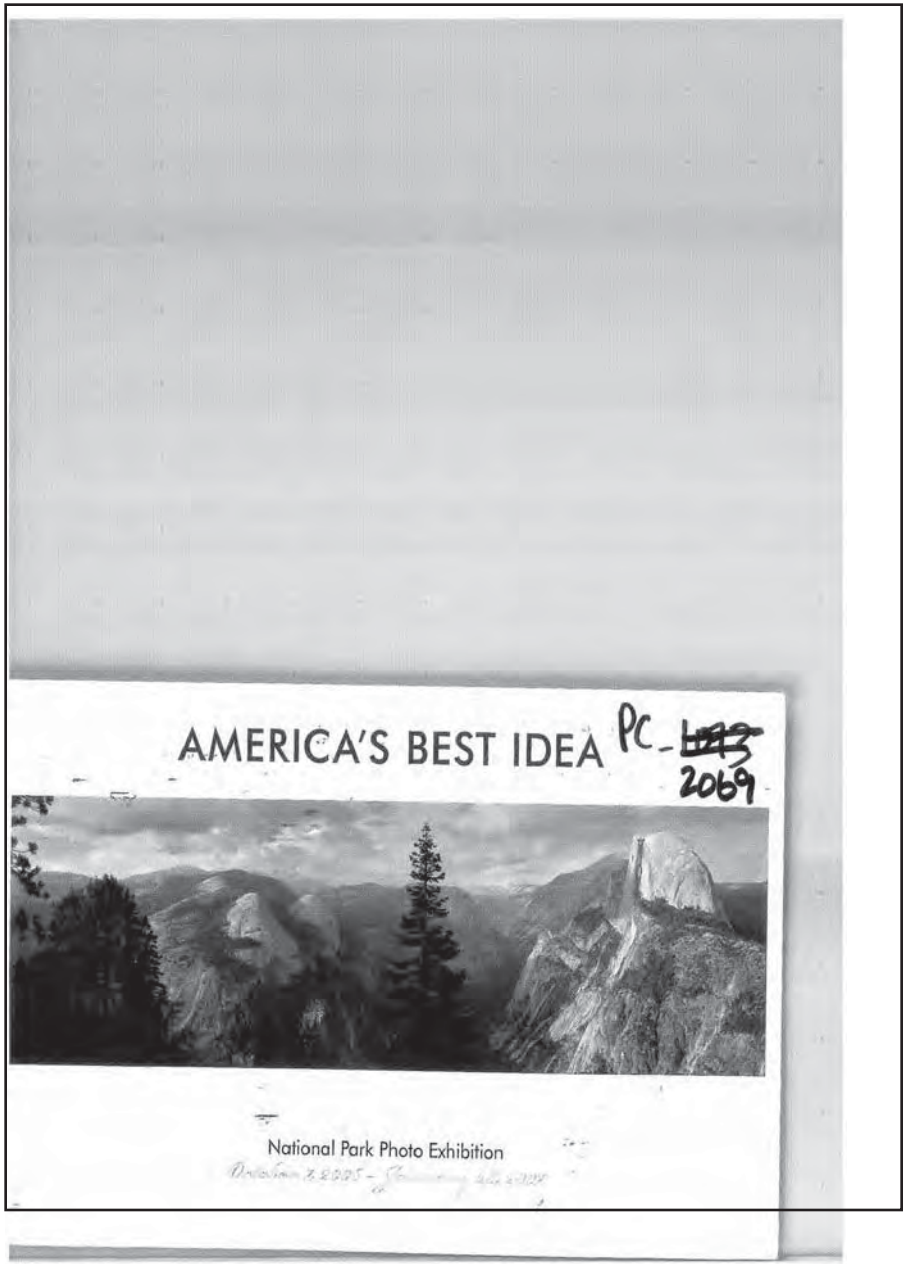
2|8A; 3|16A Congress rebuked the Energy Department's last attempts to upgrade the arsenal by defunding the Reliable Replacement Warhead and last year's proposed mega-scale bomb plant. The CMRR project is another irresponsible new program that Congress should reject.

Sincerely,

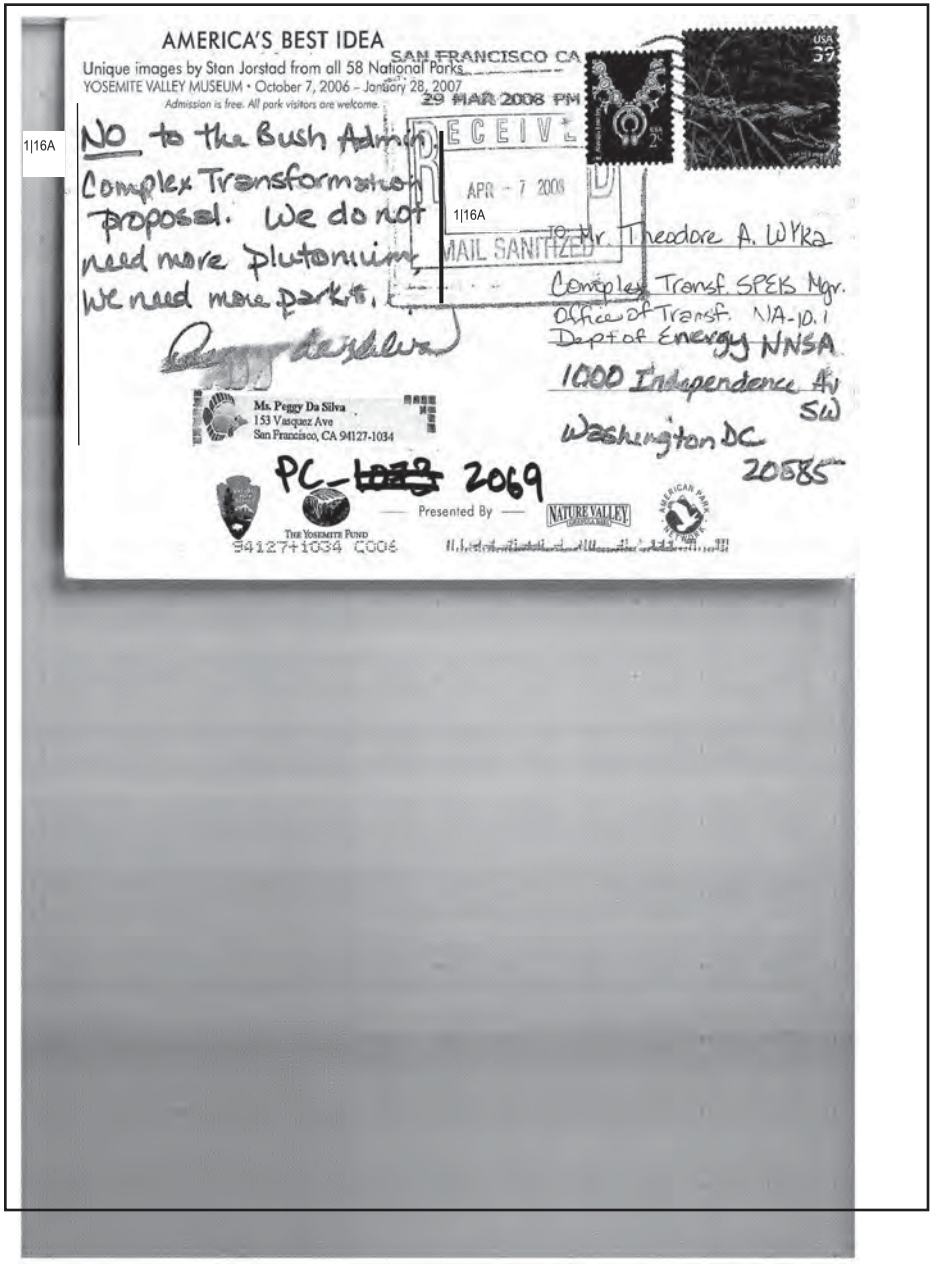
janet
775 852-1196

1

Da Silva, Peggy
Page 1 of 2



Da Silva, Peggy
Page 2 of 2



Dagen, Michael
Page 1 of 1

PC_140

Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement—U.S. Department of Energy National Nuclear Security Administration

Written Comment Form

Must be received on or before April 10, 2008.

1|10I I am for the Complex to be built and used at the Oak Ridge Site.

Michael Dagen

Please use other side if more space is needed.

Comment forms may be mailed to:
Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Comment forms may be faxed to:
(703) 931-9222
or sent by electronic mail to:
complextransformation@nnsa.doe.gov

You may also submit comments through the project website which can be found at:
http://www.complextransformationspeis.com

Dagenhart, William
Page 1 of 2

PC_4

Diversified Consulting Inc.
110 Newton Lane, Oak Ridge, TN 37830
865-483-8801. 800-531-7084 fax
dagenhartwk@bellsouth.net

February 28, 2008

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager,
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, D.C. 20585

Subject: Written Comments on the "Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement"

Dear Mr. Wyka:

1|10I My company is very supportive of the U.S. Department of Energy/NNSA Y-12 Complex and its mission. This facility's mission is very important to the United States' security and will remain so for the foreseeable future I am owner and president of DCI and a retired plasma and nuclear physicist from ORNL after 37 years of employment. I am very familiar with Y-12 and its mission since my offices were there for all but about 4 years of my employment.

1|10I (cont.) 2|14H In the important and very much needed transformation to modern facilities it is important to us that the uranium facilities stay in Oak Ridge. I do hope that as Y-12 modernizes that it will be possible to make the calutron facilities including 9204-3 available as a historic site. As an amateur historian I think that it is very important that the public be able to see the K-25 site gaseous diffusion process, the calutron process, and the graphite reactor. It would make a very valuable set of tourist sites for Oak Ridge.

Page 1 of 2

Dagenhart, William
Page 2 of 2

1|10I (cont.) The vast majority of Oak Ridge citizens support Y-12 and its mission. Those who display the WWII's atomic bomb victims and destroyed property
3|20.0 try to distort history by not displaying all the many millions of lives and property that were save by the atomic bombs use that greatly exceeded that lost to the two atomic bombs. I am a lifelong dedicated United Methodist Christian, but do not believe in unilateral disarmament as some of my UMC leaders do.

Thank you for your consideration of my views,

William Kelly Dagenhart

Dr. William Kelly Dagenhart

President and Owner of Diversified Consulting Inc.

Page 2 of 2

Dahlgren, Joy
Page 1 of 1

PC_1112

Levens, Matthew

From: Joy Dahlgren [joy@lucasvalley.net]
Sent: Thursday, March 27, 2008 2:14 PM
To: Complex2030
Subject: Bush's Latest Nuclear WeaponsPlan

Joy Dahlgren
1200 Idylberry Road
San Rafael, CA 94903-1005

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A; 2|10B Please actively oppose the Bush administration's Complex Transformation plan to build a new nuclear weapons plant at the Los Alamos National Laboratory in New Mexico. This plant would produce plutonium pits, the primary detonators in modern nuclear weapons. Congress rebuked the Energy Department's last attempts to upgrade the arsenal by defunding the Reliable Replacement Warhead and last year's proposed mega-scale bomb plant. The CMRR project is another irresponsible new program that should be rejected.

Sincerely,

Joy Dahlgren

Dais, Corrine
Page 1 of 1

PC_422

Levens, Matthew

From: Corrine Dais [cdais@sssf.org]
Sent: Friday, March 14, 2008 11:20 AM
To: Complex2030
Subject: Nuclear Weapon Plant

Corrine Dais
2733 W. Lapham
Milwaukee, WI 53215-1944

March 14, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

2|1J Building this new plant would send a contradictory message to other countries, such as Iran, who may be seeking nuclear weapons. While the U.S. is asking others to forego developing nuclear arsenals, we are simultaneously trying to increase our own capacity to build new nuclear weapons.

3|3A We already have enough nuclear weapons to destroy the Earth. We should get rid of them and not build new ones

Sincerely,

Corrine Dais
4-4-389-9538

1

Dale, Ron
Page 1 of 1

Page 1 of 1

PC_1670

Levens, Matthew

From: ron dale [ronfdale@yahoo.com]
Sent: Saturday, April 05, 2008 3:25 PM
To: Complex2030
Subject: No to "Complex Transformation

Theodore Wyka
Complex Transformation SPIES Document Manager
U.S. Department of Energy
1000 Independence Ave. SW
Washington, DC 20585

Dear Mr. Wyka:

1|16A I oppose the plan to build new nuclear weapons-Complex Transformation -for these reasons:

2|1E A. It is **ILLEGAL** The NPT (Nuclear Non-Proliferation Treaty), to which we are signatory and thus bound by law, forbids it.

3|20.0 B. It is **IMMORAL.** To threaten the existence of life on the planet or even its radical dimminishment is a self--evident evil to most of the world's inhabitants. To those with a religious viewpoint is the greatest of all evils and a blasphemy to God.

3|20.0 (cont) C. It is **NON-DEMOCRATIC.** It has been a matter of record that the majority of nations and peoples of the world oppose such nuclear activities.

4|13A1 D. It is **OPPOSED BY FORMER PROPONENTS OF NUCLEAR WEAPONS.** Such noted long-time insiders of American foreign policy as Henry Kissinger George Shultz, Sam Nunn, William Perry, and others now advocate the complete elimination of nuclear weapons because they do the opposite of what is claimed for them. They do not provide security but rather threaten it in an even greater degree.

1|16A (Cont..) There is a sense of urgency that with nuclear weapons we are quickly running out of time to solve the problems they produce. There is not a greater evil in this world than such weapons, and contemplating their "upgrate" - a euphemism for "increase" - is nothing more than insanity -an insight so beautifully said by the 9-year old testifying at the hearings in Oak Ridge Tenn. when she began her statement: "**ARE YOU INSAME**'

Thank you,

Ron Dale
28038 Universal Dr.
Warren MI, 48092 (586)-751-1199

5/16/2008

Dallmann, Patricia

Page 1 of 1

PC_1177

Levens, Matthew

From: Patricia Dallmann [patricia.dallmann@gmail.com]
Sent: Thursday, March 27, 2008 12:25 PM
To: Complex2030
Subject: Against CMRR Project

Patricia Dallmann
144 Seville St.
Philadelphia, PA 19127-1812

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|1J; 2|16A I oppose the building of a plant for production of plutonium pits for nuclear weapons. I am also against planning to modify already existent nuclear facilities. Building new plutonium pits would deter the pursuit of peace with countries such as Iran. What can rationalize our increase of nuclear weapons, while we require other countries to desist from pursuing nuclear capability? CMRR project is one in a series of poor uses of our wealth for weaponry.

Sincerely,

Patricia Dallmann

1

Danielson, Judy

Page 1 of 1

PC_1114

Levens, Matthew

From: Judy Danielson [ericorjudy@yahoo.com]
Sent: Thursday, March 27, 2008 11:39 PM
To: Complex2030
Subject: No funding for nuclear weapons research

Judy Danielson
2455 Race St.
Denver, CO 80205-5643

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|14K 2|16A As a long-time resident of Denver, CO, who worked for years to rid our community of the Rocky Flats plutonium pit plant, I want to register my strong opposition to relocating or rebuilding a nuclear plant anywhere else. Plutonium production was a hazard to our local environment and left the workers with serious and sometimes fatal uncompensated health problems.

3|3A In a world made much more dangerous by the presence of nuclear arsenals, that of the US being the biggest, it also makes no sense to increase the numbers of "weapons that we hope will never be used". As the most "powerful" nation, we should rather be a model for disarmament of these

4|1J Weapons of Mass Destruction.

5|9B I strongly oppose any funding for nuclear weapons research or development. This is a deadly program, an irresponsible use of our precious tax dollars in this time of many important economic needs.

Sincerely,

Judy Danielson
303-377-8367

1

Datso, Tsultrim

Page 1 of 1

PC_2136

Levens, Matthew

From: TsultrimDatso@cs.com
Sent: Thursday, April 10, 2008 6:15 PM
To: Complex2030
Subject: Public comment

Please log this as public comment on President Bush's nuclear weapons Complex Transformation Proposal:

1|1F; 2|1J 3|14O; 4|9B

I strongly oppose this proposal. It proliferates nuclear weapons rather than reducing them. It violates the Nonproliferation Treaty. It will encourage other nations to develop further nuclear weapons, thus accelerating the nuclear arms race and endangering life on earth. Adding the capacity for producing 50 to 80 plutonium pits annually is a misguided use of funds and threatens not only human lives, but the environment. Rather than bolstering the most extreme weapons in our military arsenal, we need to use our power and resources to build a world that is sustainable and meets the needs of its inhabitants. There are many more important global challenges such as food supply, eradicating disease, and creating gainful employment, to name a few. </HTML>

1

Davidson, Carl

Page 1 of 2

Page 1 of 1

PC_1889

Levens, Matthew

From: Carl Davidson [cdavidson@igc.org]
Sent: Sunday, April 13, 2008 8:47 AM
To: Complex2030
Subject: PA Peace Action Memo: Contact Senator Casey
Attachments: caseymemo.jpg

1|2O

5/19/2008

Davidson, Carl
Page 2 of 2

PC_1889

Coalition for Peace Action

Washington D.C.
383 Russell Senate Office Building
Washington, D.C. 20510
Phone: (202) 224-6324
Toll Free: (866) 802-2833
Fax: (202) 228-0604

Harrisburg
22 S. Third Street, Suite 6A
Harrisburg, PA 17101
Phone: (717) 231-7540
Toll Free: (866) 461-9159
Fax: (717) 231-7542

Philadelphia
2000 Market Street, Suite 1870
Philadelphia, PA 19103
Phone: (215) 405-9660
Fax: (215) 405-9668

Pittsburgh
Regional Enterprise Tower
425 Sixth Avenue, Suite 2490
Pittsburgh, PA 15219
Phone: (412) 803-7370
Fax: (412) 803-7379

Northeastern PA
409 Lackawanna Avenue, Suite 301
Scranton, PA 18503
Phone: (570) 941-0999
Fax: (570) 941-0997

Erie
17 South Park Row, Suite B-150
Erie, PA 16501
Phone: (814) 874-5090
Fax: (814) 874-5094

Central PA
817 E. Bishop Street, Suite C
Bellefonte, PA 16823
Phone: (814) 357-0314
Fax: (814) 357-0318

Lehigh Valley
940 Hamilton Street, Suite 301
Allentown, PA 18101
Phone: (610) 782-9470
Fax: (610) 782-9474

Call or Write Senator Casey!
We Need An Exit Strategy From Iraq!
Lead Them Home, Bob!

At a one hour meeting with a delegation of peace activists from Coalition for Peace Action, Code Pink, Granny Peace Brigade and Penn Action on Monday, March 31st Senator Casey agreed to meet with a team of our policy experts to explore a possible plan for safe withdrawal from Iraq.

We are assembling a team to meet with his foreign policy staff this month.

He needs to hear from you soon!

We want a "FRIENDLY PUSH" to get the Senator to lead our troops home from Iraq!

Here's the message. It's simple.
Put it in your own words!

Iran is the Key to Iraq

This week, members of Congress spent long hours questioning generals and administration officials about U.S. strategy in Iraq. According to the top general in Iraq, the war isn't going to end soon. "We haven't seen any lights at the end of the tunnel," General David Petraeus said. The general went on to blame many of the problems in Iraq on Iran. President Bush this morning added his voice to the chorus blaming Iran for the problems in Iraq and insisted that Congress should now approve more money for war.

The tragedy is there is a way to achieve peace in Iraq. The administration needs to be willing to stop blaming Iran and start working with that country. Yet administration officials this week appeared intent on ratcheting up the diplomatic and military pressure on Iran in testimony that was at times confusing and contradictory, the top U.S. officials said Iran was both responsible for inciting some of the recent fighting in Iraq and responsible for negotiating a ceasefire to stop the violence.

If Iran has this much influence, shouldn't the United States start talking to Iran about how to end the Iraq war? Negotiations between the U.S. and Iran, without preconditions, were a key recommendation of the bipartisan Iraq Study Group. A bipartisan group of senators and many people in the U.S. military also have endorsed negotiations.

Take Action

Urge your senators to cosponsor legislation introduced by Pennsylvania Senator Robert Casey (S. 2130) that would organize a diplomatic offensive in the region to talk with Iraq's neighbors and help bring an end to the war in Iraq.

This legislation will not end the war in Iraq, but it will encourage the administration to engage in the type of substantive diplomatic negotiations that could open up the possibility of a way out of Iraq. If the administration can't see light at the end of the tunnel, then perhaps Congress needs to begin looking for that light.

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Other Iraq Facts:

- Iraq is in shambles with 650,000 to 1 million Iraqis dead or wounded, 4 million displaced, families and communities ripped apart.
- Nearly 4,000 U.S. military personnel killed and over 30,000 wounded, many then neglected by our government.
- Over $500 billion spent on death and destruction in Iraq.
- Addiction to petroleum contributing to extreme climate changes and continued abuses of our natural environment, while U.S. corporations reap huge profits as they plan to control Iraq's oil.
- Torture, illegal surveillance, and erosion of civil liberties.
- And now threats of an attack on Iran and escalation of the U.S. military operation in Afghanistan.

Davidson, Phyllis
Page 1 of 1

PC_1190

Levens, Matthew

From: Phyllis Davidson [pkdpkd@verizon.net]
Sent: Thursday, March 27, 2008 6:35 PM
To: Complex2030
Subject: Nuclear Weapons

Phyllis Davidson
428 Bigham St
Pittsburgh, PA 15211-1410

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I am against any action by our government to promote production of nuclear weapons including any modification of existing facilities to make it possible to easily make nuclear weapons.

2|1J How in the world can the U.S. get upset about any other country's attempt to explore nuclear weapon options when our government does the same?

1|16A cont. Please do not support any action that pushes the world towards a nuclear collision. You can not say it is for our defense. Ours is the only nation so far that has dropped nuclear bombs on others. We have no credibility!

Thank you for considering my comments.

Sincerely,

Phyllis Davidson

Davies, Penny
Page 1 of 1

PC_1837

Levens, Matthew

From: pjdavies [pjdavies@valornet.com]
Sent: Wednesday, April 02, 2008 3:26 PM
To: Complex2030
Subject: Comments

Dear Mr. Wyka:

Due to the number of speakers at the Espanola hearing last week I was not able to comment by speaking. However, I would like to comment in writing. I live and work in Espanola and feel that the proposal would greatly affect this area as well as Los Alamos itself.

1|14O One of the main reasons I am opposed to the proposal is because of the increased pollution it would bring. Radioactivity is a silent killer.
Already LANL is not meeting its requirements to clean up its mess after 60 plus years of polluting our air, water, and food supply. The earth is in crisis now from human activities and we don't need to add to its burden of pollution. We need to be good stewards of the Earth so our great great grandchildren have a safe, healthy place to live. I don't see the point of increasingly polluting this beautiful part of planet Earth so we can have more warheads in the nuclear arsenal.

2|3A Which brings me to my next point.do we really need all these pits to make more warheads?
We certainly have more than enough to totally decimate all of us living on the planet.
3|5C.1 The present number of pits are projected to last at least 100 years. We don't need to be
4|9H spending taxpayers' money on something not necessary when there are so many other pressing needs of our people.

Thank you for your consideration of my comments.

Dr. Penny J. Davies
PO Box 1202
Santa Cruz, NM 87567

(505) 753-6260

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Davis, James
Page 1 of 1

PC_1997

Levens, Matthew

From: James C. Davis [suandjim@comcast.net]
Sent: Wednesday, April 30, 2008 2:54PM
To: Complex2030
Subject: Nuclear Weapons

James C. Davis
10736 Midsummer Drive
Reston, VA 20191-5115

April 30, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A Please vote against and funds for "modernization" or any "improvements" in nuclear weapons.
These Weapons of Mass Destruction shound be elimated, not expanded or "improved". Please work to eliminate nuclear weapons. How can we
2|1J expect the rest of the world to reduce the threat of nuclear war if the U.S. continues to expand our nuclear arms?

Sincerely,

James C. Davis
703-391-9133

Davis, Kathy
Page 1 of 1

PC_441

Buenaflor, Justin

From: Davis, Kathy (9KD) [davissk@y12.doe.gov]
Sent: Wednesday, February 27, 2008 2:30 PM
To: Complex2030
Subject: Draft Complex Transformation SPEIS

1|7N; 2|15A 3|10I

As a 20 year employee of this facility (Y-12 National Security Complex)
- I, Most Assuredly, completely Support Y-12's Mission regarding the Preferred Alternative Plan which makes Y-12 The BEST site for building the Uranium Processing Facility.
Please do everything possible to keep this work in Oak Ridge, Tennessee.

Thanks for this opportunity!
S.K. Davis
115 Tiffany Place
Oak Ridge, TN 37830

1

Davis, Morton
Page 1 of 1

PC_1654

Levens, Matthew

From: morton@mortondavis.com
Sent: Saturday, April 05, 2008 12:15 AM
To: Complex2030
Subject: Complex Transformation SPEISComments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|2U Why don't you just go ahead and kill all of us you bastards, and get it over with! Thank you.

Sincerely,
Morton Davis
Box 5571
Petaluma, CA 94955

cc:
Senator Dianne Feinstein
Senator Barbara Boxer
Representative Lynn Woolsey

De St. Croix, Lisa

Page 1 of 1

PC_2040

Levens, Matthew

From: Lisa de St. Croix [lisadestcroix@hotmail.com]
Sent: Monday, April 28, 2008 8:54 AM
To: Complex2030
Subject: New Mexico Complex

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager, Office of Transformation, NA-10.1 U.S. Department of Energy/NNSA 1000 Independence Avenue, SW Washington, D.C. 20585

Dear Mr. Wyka,

1|4A The Citizens of New Mexico need time to bring the important question of the proposed Complex Transformation to our Legislators. The "No Action Alternative" is the only respectful alternative option to follow at this time. It is important for our political
2|1C leaders to be involved, and to be in favour of such an important undertaking. Congressional races are up for elections and the outcome will instate a new political landscape in New Mexico. A new President will write a new Nuclear Posture Review. It is very unwise for NNSA to begin to embark upon a project of such magnitude at such an unstable time in our politics, environment and economy.

3|7J The only "Action Alternative" that will benefit the well being and safety of the citizens of New Mexico, and the one that the future generations whole heart-idly support is the is "Fence to Fence Clean Up". This is the "Action Alternative" requested by the New Mexico Environment Department. Please respect the rights of "Life, Liberty, and Pursuit of Happiness" of our future generations.

Sincerely,
Lisa de St. Croix

1

De Stefano, Ron

Page 1 of 1

PC_1209

Levens, Matthew

From: Ron De Stefano [peacepipers2@yahoo.com]
Sent: Thursday, April 03, 2008 7:53 PM
To: Complex2030
Subject: Enough is Enough

Ron De Stefano
40 Garden Ave
West Paterson, NJ 07424-3325

April 3, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|1J How much more of this madness must we take.We are supposed to be disarming not arming.Your hypocrisy is incredible.Are you ro longer afraid that this weaponry will get into the hands of terrorists or maybe it already has.Is this what is meant by spreading democracy?The planet will soon put you in your place.

Sincerely,

Ron De Stefano

Debella, Anthony

Page 1 of 1

PC_1012

UNOFFICIAL BALLOT
NATIONAL REFERENDUM ON
THE FUTURE OF NUCLEAR WEAPONS

INSTRUCTIONS TO VOTERS: USE BLACK OR BLUE PEN ONLY. To vote on Measures A and B, fill in the oval after the word "Yes" or "No." You may add your own comments below.

SUBMIT COMPLETED BALLOT TO DOE/NNSA BY APRIL 30, 2008

Mail: Mr. Theodore Wyka, Complex Transformation SPEIS Document Manager; Office of Transformation, NA-10.1; U.S. Department of Energy/NNSA; 1000 Independence Ave., SW, Washington, DC 20585
Fax: (703) 931-9222 • **E-mail:** ComplexTransformation@nnsa.doe.gov

MEASURES SUBMITTED TO THE VOTERS

NATIONAL

1|9A **A** Shall the United States proceed with a $150 billion plan to modernize its nuclear weapons research, development and manufacturing complex in order to replace its existing nuclear weapons and establish the capacity to build new types of nuclear weapons by the year 2030 ("Complex 2030")? YES ○ NO ●

2|1F **B** Shall the United States, in compliance with its obligation under the Nuclear Non-Proliferation Treaty, commit to the global elimination of nuclear weapons no later than 2030 by initiating negotiations leading to conclusion of a verifiable treaty, under strict and effective international control? YES ● NO ○

3|9B COMMENTS: Instead of replacing 26,000 weapons of mass destruction and genocide, how about investing 150 Billion to promote peace through diplomacy AS the alternative to Nuclear Arms proliferation. FAR greater positive Results would be realized including, most importantly, SAVing our troubled planet and the WAR MONGERS hides.

NAME Anthony M. DeBella

ADDRESS 6726 Daily Rd.
Rome, New York 13440

SIGNATURE Anthony M. DeBella DATE April 21, 2008

Decker, Hannah

Page 1 of 1

PC_492

Buenaflor, Justin

From: Hannah Decker [hsdecker@uh.edu]
Sent: Friday, February 22, 2008 11:32 PM
To: Complex2030
Subject: New Nuclear Weapons

Hannah Decker
2001 Holcombe
Houston, TX 77030-4222

February 22, 2008

Complex Transformation Department of Energy

1|16A Complex Transformation Department of Energy:

I live in Houston and am a college history professor. I am against rebuilding our nuclear arsenal. Also, do not build a plant to produce plutonium pits for nuclear weapons!

Sincerely,

Hannah Decker

1

Decorah, Pavita

Page 1 of 1

PC_824

Levens, Matthew

From: bluedeer2@yahoo.com
Sent: Monday, April 07, 2008 2:20 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|14O Please listen to good sense: there is no way to stop radioactive material from poisoning the earth and everyone who comes in contact with it. The mining of uranium kills people.
2| 14M.3 The tailings kill people. There is no time-proof way to store the radioactive waste. It Is Not Safe Energy. We need a new WPA to build renewable energy facilities, public transportation, etc.
3|1N We need innovative ideas to solve the problems man has created. Please don't go backwards.

Sincerely,
Pavita Decorah
POBox 414
Crestone, CO 81131

cc:
Senator Wayne Allard
Representative John Salazar
Senator Ken Salazar

1

Defoggi, Virginia

Page 1 of 1

PC_1335

Levens, Matthew

From: djdefoggi@earthlink.net
Sent: Tuesday, April 08, 2008 2:01 PM
To: Complex2030
Subject: Revise the Complex Transformation SPEIS

Administrator Thomas P. D'Agostino
National Nuclear Security Administration Department of Energy Washington, DC 20585

Dear Administrator D'Agostino,

1|16A NO MORE NUKES - Please.

Sincerely,

Virginia DeFoggi
1210 N 16
Boise, ID 83702

1

Degan, Janet
Page 1 of 1

PC_305

Janet Degan
2125 Paseo Primero
Santa Fe, NM 87507
March 15, 2008

Mr. Theodore Wyka
Complex Transformations SPEIS Document Manager
Off. of Transformation, NA-10.1
US DOE/NNSA
1000 Independence Ave. SW
Washington, DC 20585

Re: PEIS for Expanded Bomb Production in NM

Dear DOE,

1|7O I object to expanded bomb production.

2|16A And I object to expanded bomb production in NM. Sandia and LANL with the increase of nuclear activity (testing and manufacturing) will create an unacceptable additional impact to the urban areas of Los Alamos, Santa Fe and Albuquerque. Any increase in scientific activity in New Mexico, a state committed to peace and a pristine landscape

3|14O should be focused on environmental remediation

4|9B of pollution caused by nuclear weapon production and testing. And also an increase in how to decommission and decontaminate the existing arsenal of nuclear weapons.

Sincerely,
Janet Degan

Deleon, Paul
Page 1 of 1

PC_1831

Levens, Matthew

From: Paul DeLeon [deleonpknxv@discoveret.org]
Sent: Sunday, April 06, 2008 2:04 PM
To: Complex2030
Subject: Oak Ridge atom bombs

Dear DOE bomb-makers,

1|16A; 2|9H; 3|14O I live downwind of the Oak Ridge nuke plants. I am totally opposed to your plans to continue polluting my state and threatening the world with nuclear weapons. These weapons are a tremendous burden on taxpayers, a destabilizing factor in the world and a immediate danger to the folks who make them. We know that the materials will be dangerous for thousands of years, but at least we could spend these billions of dollars starting to dismantle and store them as safely as possible. Stop making bombs!

Paul deLeon, 630 Watauga Av., Knoxville TN 37917

1

Dellinger, Lorina
Page 1 of 4

PC_1884

Levens, Matthew

From: Wyka, Ted
Sent: Wednesday, April 02, 2008 11:16 AM
To: Complex2030
Subject: FW: Comments Pursuant to the National Environmental Policy Act, to Identify Environmental (including socioeconomic) Issues on Behalf of Nye County

Attachments: 08-0060JE.pdf

-----Original Message-----
From: Lorina Dellinger [mailto:ldellinger@co.nye.nv.us]
Sent: Tuesday, April 01, 2008 7:50 PM
To: Wyka, Ted
Cc: Morgan, Darwin J; 'Eastley'
Subject: Comments Pursuant to the National Environmental Policy Act, to Identify Environmental (including socioeconomic) Issues on Behalf of Nye County

Mr. Wyka,

The purpose of this email is to advise you that the Nye County Board of County Commissioners, at its April 1, 2008 meeting, approved comments pursuant to the National Environmental Policy Act, to identify environmental (including socioeconomic) issues on behalf of Nye County for Proposed Action and alternatives proposed by the National Nuclear Security Administration
(NNSA) potentially affecting the Tonopah Test Range and the Nevada Test Site. Attached please find Nye County's comments. Should you have any questions or need additional information please contact me.

Regards,

Lorina Dellinger

Lorina Dellinger

Nye County Administration

Administrative Assistant to County Manager

P.O. Box 153

101 Radar Road

Tonopah, NV 89049

(775) 482-7319 - Phone

(775) 482-8198 - Fax

1

Dellinger, Lorina
Page 2 of 4

<mailto:ldellinger@co.nye.nv.us> ldellinger@co.nye.nv.us

PC_1884

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***

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Dellinger, Lorina
Page 3 of 4

PC_1884

NYE COUNTY

Board of County Commissioners
Nye County
Tonopah, Nevada

Tonopah Office
101 Radar Road
Tonopah, NV 89049
Phone (775) 482-8191
Fax (775) 482-8198

April 1, 2008

Mr. Theodore A. Wyka
Complex 2030 SEIS Document Manager
Office of Transformation
US Department of Energy
1000 Independence Ave., SW
Washington, D.C. 20585

Dear Mr. Wyka:

Nye County appreciates the opportunity to comment on the Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement (DOE/EIS-0236-S4). We support the efforts of DOE to enhance the Stockpile Stewardship program to ensure that the nation's nuclear arsenal is sufficiently safe, secure, and reliable to meet national security objectives, but take strong exception to the preferred alternative to close the Tonopah Test Range.

As the situs jurisdiction for the NTS and TTR, Nye County has a long history of supporting DOE activities at these sites. All we have ever asked is that we be treated with fairness and respect as we serve the nation's defense needs. Primary among our requests is that we not lose any jobs when the DOE issues its final ruling on the transformation plan. We need those jobs, Mr. Wyka. We have endured the long-standing injustice that has ensured that the majority of federal investment in these sites has migrated to Clark County, who bears no burden in return for this benefit. To further punish a community and county that have served the nation's defense needs at every turn would be the ultimate betrayal.

15A

As I stated during the public hearings in Tonopah, Las Vegas and Washington, D.C., we would like to be selected to receive the CNPC with its 4,500 operations workers. We certainly have the room. The combination of the NTTR and the NTS represents one of the largest unpopulated land areas in the United States, comprising more that 3.5 million acres. We also have the trained construction and operations workers.

While I will not repeat each point that I made during the public hearings, I cannot overlook the fact that the *Independent Business Case Analysis of Complex Transformation Flight Test Facilities*, prepared for NNSA, December 2007 (page vi), states:

08-0060IE

Dellinger, Lorina
Page 4 of 4

PC_1884

Mr. Theodore A. Wyka
April 1, 2008
Page 2

> *Considering the collective impacts of cost (using the cost standard deviation) and mission risks, the most favorable alternative for both periods is to upgrade the TTR with HTM, reduce the number of structures to a minimum, and institute campaign operations whereby TTR is fully active part of the year and in custodial standby for the remainder (Alternative 2.2.2).*

Nye County agrees with this analysis; it is obvious that not only is the TTR the best place to do this work, but there would be no risk to mission objectives which, as you know, cannot be said of any of the other alternatives. Of the seven alternatives under consideration, only those that recommend upgrading the TTR fall into the "green" category. To additionally quote the business case analysis: *"Closure of TTR may be regretted if more rigorous NNSA testing requirements surface in the future."*

15A (cont.)

While the town of Tonopah and Nye County needs the jobs, America, in the context of our overall national security needs, requires safe, reliable testing of the devices that remain the ultimate foundation of that security.

Sincerely,

Joni Eastley

Joni Eastley, Chairman
Nye County Board of County Commissioners

08-0060IE

Dempsey, Mike

Page 1 of 1

PC_1037

Dear NNSA/DOE,

1|15A Thank you for giving me the chance to give my input tonight. I wholeheartedly support the plan to reduce the footprint of the United States nuclear weapons complex. We have enough nuclear weapons for the current world climate, but we do need to maintain and upgrade them, probably for a long time. We would love to continue our work here in Los Alamos.

2|13A The most important reason that the United States needs to maintain and refine our capability to design, manufacture, test, and improve our nuclear weapons, is that the world is full of maniacs who would love to destroy liberty, freedom, our way of life, and enslave the entire world. I say with full belief, that as long as there are nuclear weapons in the world, that the United States MUST have the best and most reliable weapons on the planet.

Why can rogue, terrorist or unstable state have a nuclear weapons capability, (Iran, North Korea, and Pakistan) and the United States, which is the brightest beacon of freedom and liberty in the world, cannot maintain this capability?

We have not used our nuclear weapons in anger in 63 years. We ended a war we did not start with our weapons, and saved maybe a million lives by doing so.

There may be many people in the United States (and Japan) who would never have been born if we had attempted a ground invasion of Japan to end WWII. My fathering-law would surely have been one of those killed. He was piloting an LSU (Landing Ship Universal) around Okinawa bay when the two atomic bombs ended the war. He was walking around Nagasaki 3 month later. My wife might never have been born, or perhaps my self, as my father may have recalled to serve yet again, this time in the in the Pacific theater. How many other Americans would have been killed if we had not ended the war early? How many would never have been born.

1|15A (cont) I worked in the weapons manufacturing field here at Los Alamos for 11 years, in the pit manufacturing building, providing radiation protection services. I still work and live in Los Alamos, setting up cargo monitors trying to interdict illicit shipments of radioactive material to the United States. I know we can do the job best, can do it safely and with environmental awareness, and do it for as long as needed.

In closing, I would like to mention comments from Gene Shoemaker, an astrophysicist who first identified Meteor Crater AZ for what it is (a meteor crater), and the co-discoverer of the Shoemaker-Levy comet which crashed into Jupiter on 1994.

Gene said that he was glad we had nuclear weapons, and that he believed that if required, they could be used to nudge an asteroid or comet which was on a collision course with earth to a new orbit which would prevent it from striking the earth.

Think about that, nuclear weapons save mankind again.

Sincerely,

Mike Dempsey
300 Connie Ave.
Los Alamos, NM 87544
505-572-3726

Los Alamos, NM

Dennis, Dianna

Page 1 of 1

PC_444

Buenaflor, Justin

From: dennisservices@yahoo.com
Sent: Saturday, February 23, 2008 3:56 PM
To: Complex2030
Subject: no nukes please

Theodore Wyka, Complex Transformation SPEIS Manager Office of Transformation, NA-10.1 U.S. Department of Energy/NNSA Washington, DC 20585

Dear Mr. Wyka,

1|16A Nuclear weapons need to be eliminated world wide (and nuclear plants to) and put on the history shelves never to be learned how to make a nuclear bomb again if you ask me. It is just wrong!
thank you

2|7O The DOE needs to abandon its Cold War mindset. The United States can and will maintain a reliable nuclear arsenal for many years and does not need to build new nuclear weapons. The focus should be on shrinking the still-oversized nuclear weapons complex and on maintaining the safety and security of existing weapons as the size of our nuclear stockpile is reduced.

Sincerely,
Dianna Dennis
222 a.F. Moore rd
Spring Hope, NC 27882

1

Dennis, Jon
Page 1 of 1

PC_1396

Levens, Matthew

From: Jon Dennis [jon_dennis@peacenail.com]
Sent: Tuesday, April 08, 2008 3:49 PM
To: Complex2030
Subject: Reject "Complex Transformation' plan to build nuclear weapons

Jon Dennis
1022 East B Avenue
Hutchinson, KS 67501

April 8, 2008

Theodore A Wyka
Complex 2030 SEIS Document Manager
Office of Transformation, U.S. Department of Energy, NA 10.1 1000 Independence Avenue, SW.
Washington, DC 20585

Dear Theodore Wyka:

1|16A The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal.

Martin Luther King says that "A nation that continues to spend more money on military defense than on programs of social uplift is approaching spiritual death." The $150 BILLION dollars which Complex Transformation would spend would further transform our country into something that lies in direct opposition to the spirit in which America was founded--a war machine that is ever-ready to destroy millions upon millions of innocent lives. Even if these weapons are never used against a military opponent, their testing and procurement will continue the United States' 63 year long tradition of poisoning its
2|14O own and others' land, disrupting the delicate desert and island ecosystems, and forcing American and Native
American downwinders to breathe highly carcirogenic fallout. Complex Transformation would restate to all other nations what the United States has, in effect, stated since its bombings of Hiroshima and Nagasaki: that the ability "strategically" vaporize millions of innocent human beings is worth more to us than .

Given our past history of illegal and precarious war-making, it would be foolish to begin a program to further the technologies of the deadliest weapons that humans have ever devised. Given our disregard of international law and our lack of reverence for human
3|9B life, I am far from assured that these weapons would be deployed only as a second-strike retaliation. I can think of countless ways to spend $150 BILLION dollars that would affirm and preserve life, and further enact our nation's belief that all men and women "are endowed by their Creator with certain uralienable Rights, that among these are Life, Liberty and the pursuit of Happiness." Weapons of mass destruction fundamentally challenge all three of these rights and are not consistent with the virtues that we claim as a nation.

4|1J By building up its nuclear arsenal right now, the US is essentially telling the world, "Do as I say, not as I do."

Prayers and Blessings,

Jon Dennis
620.802.3732

Deolloqui-Turner, Mimi
Page 1 of 1

PC_1162

Levens, Matthew

From: MimideO531@hotmail.com
Sent: Saturday, March 29, 2008 11:55 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Theodore Wyka, Complex Transformation SPEIS Manager Office of Transformation, NA-10.1 U.S. Department of Energy/NNSA Washington, DC 20585

Dear Mr. Wyka,

I applaud the Department of Energy for moving forward with plans to consolidate and reduce the facilities, workforce, and redundant capabilities within the nation's nuclear weapons complex.

1|1J However, Complex Transformation puts too much emphasis on recreating the unnecessary capability to research, develop, and manufacture new types of nuclear weapons. The United States still maintains thousands of nuclear weapons and has thousands more in storage--more than enough to maintain a credible nuclear deterrent for the foreseeable future. We do not need the capability to make more or newer nuclear weapons.

In addition, Complex Transformation undermines U.S. efforts to stop the spread of nuclear weapons around the world. In addition, Complex Transformation undermines U.S. efforts to stop the spread of nuclear weapons around the world. It sends the wrong message to the world by instilling a false sense of confidence in the ability of these weapons to increase security.

2|9B; 3|3A Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE should focus on shrinking the still-oversized nuclear weapons complex and on maintaining the safety and security of our existing weapons arsenal as the size of our nuclear stockpile is reduced.

Sincerely,
Mimi deOlloqui-Turner
531 South Pearl Street
Denver, CO 80209

1

Depew, Joan
Page 1 of 1

PC_1103

Levens, Matthew

From: Joan Depew [jedepew@earthlink.net]
Sent: Thursday, March 27, 2008 3:29 PM
To: Complex2030
Subject: Reject "Complex Transformation" plan to build nuclear weapons

Joan Depew
2142 E. Crary St.
Pasadena, CA 91104-1826

March 27, 2008

Theodore A Wyka
Complex 2030 SEIS Document Manager
Office of Transformation, U.S. Department of Energy, NA-10.1 1000 Independence Avenue, SW.
Washington, DC 20585

Dear Theodore Wyka:

1|16A The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal.

1|16A (cont.); 3|9B; 4|1J A resounding NO to Complex Transformation! We don't need a "new generation" of nuclear weapons. We need our resources to go to humane pursuits. It's time to get real!

By building up its nuclear arsenal right now, the US is essentially telling the world, "Do as I say, not as I do."

Sincerely,

Joan Depew
626-221-7977

1

Destefano, Linda
Page 1 of 1

5031 Onondaga Rd.
Syracuse, NY 13215-1403
April 26, 2008

PC_985

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation
NA=10.1
U.S. DOE/NNSA
1000 Independence Ave., S.W.
Washington, D.C. 20585

Dear Mr Wyka:

16A I am vehemently opposed to the proposal to do R&D and - utimately - production of a new generation of nuclear weapons. I pay hefty federal taxes, which I do not want used to make the world more dangerous by generating more nuclear weapons.

Our government should be doing its part in reducing the number of nuclear weapons in the world.

Sincerely,

Linda A DeStefano

(Ms.) Linda A. DeStefano

Deveney, Kenneth
Page 1 of 1

PC_1422

Levens, Matthew

From: ken [kenndev@yahoo.com]
Sent: Tuesday, April 08, 2008 1:24 AM
To: Complex2030
Subject: Comment on new Oak Ridge plant

Dear Mr. Wyka,

1|16A
2|9B
3|13A.1

Nuclear weapons are madness. They make us less safe. The money would be better spent on new, safe methods of energy production.

Kenneth Deveney
Ashland, OR

You rock. That's why Blockbuster's offering you one month of Blockbuster Total Access, No Cost.
http://tc.deals.yahoo.com/tc/blockbuster/text5.com

1

Dewhurst, David
Page 1 of 1

AUG 28 1997 12:02 FR TO 912025867754 P.02/02

David Dewhurst
Lieutenant Governor of Texas
President of the Senate

The Capitol
Austin, Texas 78711-2068
512-463-0001

1-800-441-0373
Fax: 512-936-6700
Dial 711 for Relay Calls

April 7, 2008

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Re: Complex Transformation Supplemental Programmatic Environmental Impact Statement (Complex Transformation SPEIS, DOE/EIS 0236-S4)

Dear Mr. Wyka:

Thank you for the opportunity to comment on this matter. The Department of Energy's Complex Transformation Supplemental Programmatic Environmental Impact Statement (SPEIS) is of great importance to the Amarillo community.

1|10.F

I strongly support Pantex maintaining its current functions, advocate for Pantex receiving the new functions and facilities listed in the preferred alternatives for the SPEIS, and urge DOE to reject any option that would result in the reduction or cessation of functions at Pantex.

The Pantex plant enjoys tremendous public and bipartisan political support for existing and new missions and can ably perform those missions at the lowest costs to taxpayers.

Thank you again for this opportunity to comment. Please do not hesitate to contact me if I can answer any questions or further illustrate my support for Pantex.

Sincerely,

David Dewhurst

David Dewhurst
Lieutenant Governor

** TOTAL PAGE.02 **

Dickson, Mary
Page 1 of 5

PC – 903

Mary Dickson
417 8th Avenue
Salt Lake City, UT 84103
(801) 581-3263
sitkala@earthlink.net
870 words

Nuclear Testing Affects All Americans

By Mary Dickson

I carry a credit card sized map of the United States in my wallet.

It's from Richard L. Miller's book, *Under the Cloud: The Decades of Nuclear Testing*, and it shows where radioactive fallout went during the 12 years of atmospheric testing from 1951-1962 at the Nevada Test Site. Utah and Nevada are almost completely blacked out, and the black ink spreads as far east as New York and as far north as Canada.

I carry that map as a way of bearing witness and as a warning to remain vigilant. As part of the "War on Terror," we are seeing preparations for a new round of nuclear testing at the Nevada Test Site, along with hollow assurances that it will be safe. 1|7M.1

I don't need any reminders of what fallout did to people living in those areas of black on Miller's map. There is another map I carry, one that is drawn by the scars on my body. My thyroid cancer at age 29 was one of the most common cancers arising from exposure to fallout. In the following years, other tumors led to a hysterectomy. As a child, I lived under the clouds from atomic testing. Like my friends, I ate the snow, I drank the milk and I ate the vegetables. 2|14O

I keep a growing list of people from my childhood neighborhood in Salt Lake City who have become sick or died. It includes my sister, who lost her life three years ago, and 42 people we grew up with along the rim of Parley's Canyon. We are walking witnesses that radiation works in strange ways. It doesn't kill you out right. It attacks cells that mutate and sometimes take years to manifest as cancer, leukemia and other auto-immune disease. The genetic damage it causes can be passed on to future generations. Not only does the long lag time between our exposure to fallout and our illness make it hard to prove they are linked, it also makes it easier to forget us and the fallout that we are convinced made us sick. Had downwinders across this country become ill or died immediately following those blasts in the Nevada desert, our numbers would have been considered a national catastrophe.

More than 100 nuclear blasts were conducted above ground at the Nevada Test Site. When atmospheric testing was banned in 1962, tests continued to be conducted

Dickson, Mary
Page 2 of 5

underground until 1992. Many of the 804 underground tests leaked, putting American civilians in harm's way. We became the expendable victims of the Cold War.

Sadly, the vast majority of downwinders in this country do not even realize they are downwinders. Most Americans mistakenly assume that atomic testing affected only Southern Utah. Those are the only stories they've heard. Radiation does not respect arbitrary lines on a map. It is picked up by the jet stream and carried across the country. That's how it got to Albany, Utica and Troy, New York. Albany journalist Bill Heller, who wrote *A Good Day Has No Rain*, documented how fallout doused upstate New York in the aftermath of a test called Simon, detonated on April 25, 1953 in the Nevada desert. Radioactive fallout from that test was picked up by the jet stream and rained out on upstate New York during an extremely violent thunderstorm. Queens County in New York twice ranked number one in terms of fallout in the entire country.

It's impossible to know how many cancers or other illnesses across this country may be linked to fallout. According to a 15-year study by the National Cancer Institute, as many as 75,000 cases of thyroid cancer alone likely are related to testing. Declassified documents show that government officials knew the facts about fallout and that they systematically lied to the American people for decades, assuring us "there is no danger." That's why we downwinders take no comfort from our government's assurances that should testing resume it will be underground and pose no danger. We remember other undergrounds tests that vented, including the notorious 1970 Baneberry shot which spewed radioactive debris 10,000 feet into the skies, where it was picked up by the jet stream and tracked all the way to Canada. The U.S. Congress Office of Technology Assessment released a study in 1989 concluding that "there can never be 100 percent assurance that an underground test will not leak." Anything short of 100 percent assurance is simply not acceptable. 2|14O (cont.)

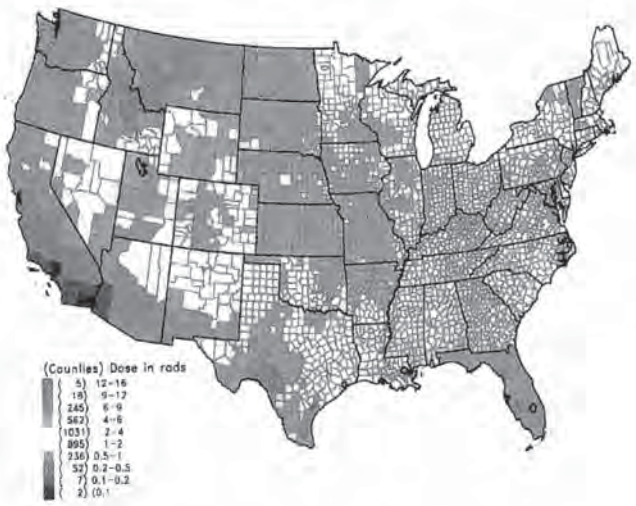
As downwinders, we have earned the right to be outraged at this administration's callous abandonment of the hard-won ban on nuclear testing. At the President's request, Congress lifted the ban on "mini-nukes," fully funded research for a new "bunker buster" nuclear weapon, and authorized spending $25 million to upgrade the Nevada Test Site so that it can be ready to resume underground testing. The wheels have been set in motion.

If our government resumes nuclear testing, we could again become expendable in the name of "national defense." As my friend who is also a downwinder says, "nuclear testing has nothing to do with the war on terror; it is terror itself." If we learned anything from being the unwitting subjects of the massive experiment of atomic testing, it is that we are all downwinders. 3|13A.1; 1|7M.1 (cont.)

Mary Dickson is a downwinder and writer in Salt Lake City, Utah.

Dickson, Mary
Page 3 of 5

Figure 1: Per capita thyroid doses resulting from all exposure routes from all tests



Dickson, Mary
Page 4 of 5

Good morning. My name is Richard Miller. By profession I am an environmental professional and some time author of books on nuclear testing. I am a former government employee with the occupational safety and health administration, US labor dept. of labor. In my capacity as an OSHA field professional I evaluated over 500 worksites for toxic exposures and related health hazards. In 1979 I directed the field epidemiology study of 28 cases of glioblasoma multiforme on the Texas Gulf coast. For which I was awarded an exceptional service award from OSHA and a commendation from the director of NIOSH. The investigation itself was eventually published in the Am J of Ind Med.

In 1986 Macmillan published my first book on nuclear testing—Under The Cloud. The book included data on nuclear fallout and particularly trajectories of nuclear clouds as they moved across the country. For the first time I learned that nuclear debris traveled to nearly every county in the United States. At the time I wanted to learn if fallout was associated with cancer, but the data was not available.

In 1997 the NCI published its report on fallout—a detailed county-by-county estimate of I-131 values. I downloaded the data, plugged it into Microsoft Excel and set to work. By 1997 the cancer data was available from another government site—the CDC WONDER site—which gave adjusted cancer rates per 100,000 by county, age weighted and standardized to 1970.

Late in 1999 I applied statistical software such as Statistica, Systat, and Egret to the two data sets, looking for associations. Eventually, using the Hicks Tables I was ab le to parse many of the other radioisotopes from the I-131 values. While the process was cumbersome, it was not mathematically difficult. The satt procedure involved Spearman correlation, Poisson Regression, Logistic Regression, Pooled Standard Error and Multiple Adaptive Regression Spline Analysis. I found strong associations between fallout and cancer—not just in Utah, but across the entire United States.

I learned that each nuclear test is unique in its radioisotope spectrum

That rainouts are a major factor in fallout deposition.

That Iowa and Missouri are among the hottest fallout states in the nation.

That McPherson Kansas is the hottest county for curium 242.

That Adams county Idaho was the hottest fallout county in the nation seven different times.

That Archuleta County CO was Number 1 five times and Bergen County NH was Number 1 in fallout four different times.

I learned that Howard county Iowa received 950 microcuries per sq meter in just one day—950 uCi/sq meter on Jul 8, 1962---more than Nye county Nevada received in any ONE day.

Dickson, Mary
Page 5 of 5

I learned that overall, the hottest state for fallout is not Nevada, but Iowa.

The statistical analysis revealed that breast cancer among white females in the 1980-89 and 1990-98 decades appears to be strongly associated with rainfall during the nuclear test period—as well as with deposition of the following radioisotopes: Be7, Mn54, W185 and Co60.

The statistical analysis also revealed strong associations between white female colon cancer and Co60, Be7, Am241 and Eu155.

The link between one isotope—Ba139 and male colon cancer for 1990-1998 is so strong that the correlation returns a Z score of 19.

Thus, I urge the Academy to consider expanding RECA to cover not only N. Utah but also to hot fallout zones in the rest of the United States—places like Washington County NY, Knox and Lewis counties in MO, and Howard, Worth and Mitchell counties in Iowa.

Moreover, I would welcome and would cooperate fully with any researcher seeking to replicate my work. To that effect I have already published The US Fallout Atlas Vol 5—which consists of calculation results that constitute the core of my work.

I believe it is time we carefully evaluate the fallout deposition history not only in Utah, but in the rest of the country. It would give us a unique big picture view of an interesting period of our nation's history and could possibly shed light on the etiologies of some unusual cancers seen in the fallout zones—such as soft tissue sarcomas. However, the greatest contribution would be that of identifying and understanding some of the risk factors associated with our American population—a function that would allow physicians such as Dr. Childress to properly assess risk profiles in patients and thus aid in their practice of preventative medicine.

Dishman, Taskel
Page 1 of 1

PC_760

Levens, Matthew

From: Taskel Dishman [tld@iopener.net]
Sent: Tuesday, November 28, 2000 4:21 PM
To: Complex2030
Subject: $3 billion in our account, yet no COLAs

1|20

Hi, it has been a great pleasure serving my country in the Korean war and then 37 years at Y-12. Since I left Y-12 in 1990, things have not been so good. As I'll tell you, the/we retirees have been used and now abused. Our government can do better and you've been sent into the area to find ways to help us, the area and the program; I wish you much success ... success we've not seen from the people we send to Washington to represent us or the contractors that have been selected since about 1990. Please take steps to stop punishing the old people that many, have given their all for the country .....!

> >

> > Over the years, 12,000 good people spent their careers working for the DOE > > contractors in Oak Ridge supporting the nation's defense, and now those > > people are suffering great financial injustice. While the old contractor > > Union Carbide was in charge, retirees were given periodic increases to keep > > them from falling too far behind inflation. But since 1984 when new > > contractors took over, no new money has been put in the fund. People who have > > been retired for 20 years have suffered so much and in that time, > > lost at least HALF their buying power. Meanwhile, not paying us, the pension fund > > financial managers have done so well that there are hundreds of millions of > > dollars extra, beyond all projected needs under the current scheme. We need > > some of that money given to help out current retirees. DOE and the > > contractors should be investing some NEW money into the pension fund for > > their current employees, not coasting along with the old money and > > withholding it from those already retired who need help with their painful living > > costs. When you pay $3.00 for gas, we already pay the equivalent of $6.00 and > > so it is with everything we buy!

> >

> > Do those managers know how badly our retirees are suffering with no > > cost-of-living increases? Some months ago they sent information on the new > > dental and eye coverage insurance options, which of course were more > > expensive, and said that if our check was not sufficient to cover the cost, > > we would have to send THEM the extra money! With medical insurance taking > > all the check for some, how do they think we can pay our other bills for food, > > housing and energy? Even more important, do they care?

> >

> > Some have estimated that, if more regular pension adjustments had been made > > to retirees over the last 20 years or so, there would have been more than a > > billion dollars fed into our local economy-money that would have been spent > > and taxed, helping everyone in the area. Some local governments surely > > could have used their share to help pay their teachers and law enforcement > > officers better. Yet the local leaders who know of the situation have not > > made an effort to help us and their community's economy. It is a mystery > > why the LOCAL leaders and our FEDERAL representatives have not helped us.

> >

> > We need you all, the larger East Tennessee community, to be aware of our > > situation and ask questions about it to our government leaders. Let them > > know that the situation is widely recognized, people are talking about it, > > and something should be done about it. It won't cause another tax, the money > > is already there in the pension fund and our getting justice may lower local > > taxes. See the CORRE web site (www.corre.info) for more facts.

> Please help us and the people in the area find justice after s many years.....!

> TL Dishman, Knoxville, 37 years Y-12 after Korean war service

>

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Ditmanson, Dale
Page 1 of 2

PC_44

United States Department of the Interior

NATIONAL PARK SERVICE
Great Smoky Mountains National Park
107 Park Headquarters Road
Gatlinburg, Tennessee 37738

IN REPLY REFER TO:

L76

January 31, 2008

Theodore A. Wyka
Complex Transformation SPEIS Document Manager
Office of Transportation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Ave, SW
Washington, DC 20585

Dear Mr. Wyka:

Great Smoky Mountains National Park (Park) received National Nuclear Security Administration's (NNSA) draft Complex Transformation Supplemental Programmatic Environmental Impact Statement (SPEIS, DOE/EIS-0236-S4). This study assesses potential environmental impacts for transforming America's nuclear weapons complexes to one that is smaller, more efficient, more secure and better able to respond to the changes in national security requirements. The document includes discussion of the Y12 National Security Complex in Oak Ridge, Tennessee, the complex closest to the Park.

1|15A As a Corridor Board Member, we wish to express support for the modernization efforts of Y12. It is very important that Y12 operations continue to be upgraded and enhanced, while still providing for national security. It is equally important that the environmental

2|7J cleanup of the site must be included as a key component in this evaluation.

A fresh look at the nation's Y12 National Security Complex is a positive step to improving the efficiency of its operation and how it fits into the overall program. Modernization of Y12 will clearly indicate a commitment to the community to preserve its economy, and our nation's security while preserving the environment. We wish to emphasize that work to enhance the facility should include efforts to streamline and

1|15A (cont.) phase out old antiquated operations and should include comprehensive environmental

3|14I remediation.

The Y12 National Security Complex has long been a key partner in the Tennessee Valley and a major player in America's national defense. Great Smoky Mountains National Park has benefited from having scientists associated with the Oak Ridge Facility available for consultation. Y12 has and will continue to be an important contributor to

TAKE PRIDE IN AMERICA

Ditmanson, Dale
Page 2 of 2

2

our region and nation over the years with effective modernization. We support the transformation of Y12 into a more modern, cost effective and responsive entity.

Thank you for your consideration.

Sincerely,

Dale A. Ditmanson
Superintendent

Dolan, Judy
Page 1 of 1

PC_1407

Levens, Matthew

From: Judy Dolan [jdolan@sommerbanard.com]
Sent: Tuesday, February 19, 2008 3:41 PM
To: Complex2030
Subject: Nuclear Waste

Judy Dolan
12639 Feldspar Rd.
Indianapolis, IN 46236-9366

February 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

2|8A Congress rebuked the Energy Department's last attempts to upgrade the arsenal by defunding the Reliable Replacement Warhead and last year's proposed mega-scale bomb plant. The CMRR project is another irresponsible new program that Congress should reject.

Sincerely,

Judy Dolan

Domenici, Pete
Page 1 of 6

PETE V. DOMENICI
NEW MEXICO

United States Senate
WASHINGTON, DC 20510-3101

COMMITTEES
ENERGY AND NATURAL RESOURCES
APPROPRIATIONS
BUDGET
HOMELAND SECURITY AND GOVERNMENTAL AFFAIRS
INDIAN AFFAIRS

April 8, 2008

Thomas D'Agostino
Administrator
National Nuclear Security Administration
US Department Energy
1000 Independence Avenue, SW
Washington, DC 20585

Dear Administrator D'Agostino:

I would like to thank the Department and the NNSA for all its hard work in developing the proposed complex transformation initiative. The proposals included in the "preferred alternative" represent a thorough review of the program, facilities and mission of the nuclear weapons complex. Correctly, the NNSA has proposed an aggressive strategy to consolidate and dispose of excess special nuclear material that consumes an extraordinary amount of federal resources to meet security requirements.

1|15.O, 2|10.B, 3|8.A For the most part, I support the plan of action described in the "preferred alternative." In particular the support for the Chemistry and Metallurgy Research Replacement (CMR-R) facility and the goals of the Reliable Replacement Warhead (RRW) program. However, there are several areas of concern that I wish to call to the attention of the Department.

As the complex is transformed it must not measure success only in terms of floor space and manpower reductions but also in terms of enhancements to the science base that is the lifeblood of stockpile stewardship. The preferred alternative falls short in this regard. 4|10.G High performance computing is not supported at Sandia National Laboratory. Much needed investment in scientific facilities at Los Alamos National Laboratory, specifically the necessary refurbishment at LANSCE, is also missing. The enduring national security mission of the laboratories can only be fulfilled if their high level of scientific excellence is sustained. 2|10.B (cont.)

5|14.M Key elements of the national security mission touch on complex transformation and should also be considered. Plutonium disposition is a major U.S. nonproliferation initiative. Sustained investment in facility construction is necessary for its completion. As consolidation proceeds at the Sandia California site, its mission should be reconsidered to 6|10.G.1 ensure the resulting arrangement is sustainable.

Domenici, Pete
Page 2 of 6

7|15.A.1
8|14.I

More generally, complex transformation under the "preferred alternative" will be a major undertaking. During its implementation, care must be taken to avoid unintended consequences. Job reductions of the magnitude contemplated could cripple key mission areas and must be managed carefully.

9|2.E

As the end of the public comment period draws near, I offer additional comments in the following attachment. Some have called for an extension to the existing comment period which, as you know, exceeds the statutory requirement. I believe the Department has met its obligations in this regard and has been highly accommodating in its pursuit of public input to date. As such there is no need to extend the comment period beyond a week or two which would only serve to delay the review process.

I encourage the Department to adopt the changes I recommend and proceed quickly with its decision on the SPEIS so that we can begin to realize the benefits of a more capable and responsive infrastructure that we both desire.

Sincerely,

Pete V. Domenici
United States Senator

Cc: Ted Wyka, Office of Transformation NA-10.1

Attachment

Domenici, Pete
Page 3 of 6

Attachment

Comments on the SPEIS for Complex Transformation
Senator Pete V. Domenici

CMR-R

I support consolidating the remaining plutonium operations at Los Alamos, which since its inception during the Manhattan project, has been the leading plutonium research facility in the U.S. Independent analyses also demonstrate that completion of all three phases of the CMR-R facility as proposed in the "preferred alternative" is the most cost effective solution. The construction of this facility will be costly, but it is primarily due to high security and safety requirements, including seismic and state-of-the-art air handling requirements.

Worker safety and security are two areas where we must not cut corners. It is unacceptable to continue to utilize the existing CMR facility any longer than absolutely necessary. This facility was built in 1952 and doesn't provide modern safety and security features that the New Mexico workforce deserves and should expect. The Defense Nuclear Facilities Safety Board has directed the NNSA to close the existing facility by 2010 for safety reasons.

2|10.B (cont.)

Today, Los Alamos serves as the only pit manufacturing capability in the nation, albeit at a fraction of the capacity that was maintained at the Rocky Flats plant in Colorado. So long as our country maintains a nuclear deterrent, we will need some basic level of production capacity to support that mission.

Opponents have incorrectly argued that the CMR-R facility constitutes a new pit production facility at Los Alamos. This is not accurate, and I believe a deliberate attempt to confuse the issue. NNSA has been very clear that the only location in the complex that will manufacture nuclear pits will be Technical Area 55 and not CMR-R. The new facility will provide essential chemistry and analytical support to the existing production mission in Technical Area 55 behind the security perimeter.

With regard to the pit production capacity, it is important to note that Congress has given careful consideration to this matter. In the fiscal 2006 Energy and Water Conference, we eliminated the funding for a new modern pit facility. In fiscal year 2008 Consolidated Appropriations Act (P.L. 110-161), Congress directed the NNSA to limit their potential pit production capacity to no greater that 80 pits per year. This is consistent with the "preferred alternative," which proposes a production capacity of 50-80 pits per year.

Domenici, Pete
Page 4 of 6

RRW

I believe that the RRW study, which Congress initiated in the fiscal year 2005, has enabled scientists and policy makers to consider even safer, more secure and ultimately lower cost ways to produce the replacement systems necessary for our stockpile, all while maintaining the high level of reliability demanded. Design changes can reduce the complexity of the stockpile and the national infrastructure that supports it. The prospect for enhanced use controls is particularly attractive. Completion of the RRW feasibility study will enable policy makers to make informed, rather than emotional, decisions about the nuclear deterrent.

3|8.A (cont.)

I am encouraged by the Department's efforts to minimize the use of hazardous materials in the weapons complex. It is imperative that the Department continue to pursue technology improvements as part of the life extension program that will improve worker safety. The integration of improved warhead security features should also be a priority.

High Performance Computing

I find no scientific or economic justification for discontinuing the investment in high performance computing and simulation capability at each of the three national security laboratories. Despite its claim to support a capability based approach, the SPIES undermines Sandia National Laboratories computing capability without any explanation of how the lab will compensate for this loss.

Moreover, there is no strategy within any of the supporting documents that provides a long-term vision for advanced computing architecture and algorithm development necessary to sustain NNSA's leadership in world class computing and simulation. Development of the high performance computing capabilities by the three national labs has made the stockpile stewardship program a success and enabled the U.S. to maintain a moratorium on underground testing. It would be unwise to neglect this vital capability.

4|10.G (cont.)

The Department should reject its proposal to consolidate its computing investments from three to two laboratories, and instead should outline a strategy to sustain the long term investments at each of the labs and to develop a joint research and development program between NNSA, the Office of Science and U.S. industrial partners to drive the development of advanced computing architectures and algorithms consistent with the direction of the fiscal year 2008 Omnibus Appropriations. Further, the NNSA should specifically address the computing needs of the nonproliferation programs, which require different data processing and algorithms.

LANSCE

The SPEIS does not give adequate consideration to the investment in the overall science mission necessary to sustain cutting edge science at the national laboratories. The NNSA should be commended for its support of the existing facilities, including Z Machine, the National Ignition Facility, DARHT, and MESA. All of which already, or soon will,

2|10.B (cont.)

contribute to the science-based stockpile stewardship program as well as broader scientific and energy research endeavors.

However, facilities such as the Los Alamos Neutron Science Center, which supports both weapons and non-weapons missions, need a long term investment strategy to ensure their availability for Stockpile Stewardship activities and to serve as a magnet to attract top scientists. I believe that Los Alamos is well positioned to lead advanced research and development efforts focused on evaluating material behavior in extreme environments including high radiation and pressures.

2|10.B (cont.)

I suggest that the NNSA develop and implement a long-term science strategy for each of the three laboratories, similar to the 20 year investment strategy developed by the Office of Science, including a specific plan to invest in near term science capabilities at Los Alamos.

MOX

In order to achieve lasting savings from complex consolidation, excess nuclear material must have a final disposition pathway. It has long been decided that the Mixed Oxide Fuel (MOX) Facility under construction at the Savannah River Site, South Carolina, would transform our nation's surplus plutonium into civilian reactor fuel. The successful execution of this program is important in terms of fulfilling our international nonproliferation commitments as well. There continue to be difficulties in maintaining progress with this effort. The Department should do all it can to ensure that the MOX facility is completed and the plutonium disposition program proceeds on schedule.

5|14.M (cont.)

Sandia California Site

I believe that the NNSA should take a more strategic view of its plans under the "preferred alterative" for the Sandia California site. I support the proposed consolidation of the classified activities and weapons engineering mission to a fewer number of buildings on the site, thus reducing the overall security footprint. However, in doing so the mission for the remainder of the site needs better definition. An effort should be made to ensure its sustainability through the joint efforts of NNSA and DOE.

6|10.G.1 (cont.)

I recommend the Department build upon the existing capabilities of the state-of-the-art Combustion Research Facility on the site. By integrating the relevant offices within the Department of Energy, as well as engaging university and private sector participants in the San Francisco Bay area, the Department can promote a collaborative effort to transform our transportation sector through a combination of basic and applied science. Sandia California, can also serve as a major location for collaboration for non-weapons scientific research within Lawrence Livermore National Laboratory, similar to the gateways provided by the Office of Science nanotechnology centers.

Domenici, Pete
Page 6 of 6

Comment Period

Based on the high degree of public engagement that has been achieved, evidenced by the large number of comments received during the comment period on the Notice of Intent and the well attended meetings conducted across New Mexico on the SPEIS, I believe the NNSA has provided adequate time for public comment and review and should not extend the comment period beyond a week or two.

The Department of Energy and the NNSA, along with the national laboratories and the manufacturing facilities in the complex, have worked very hard to develop a proposal for complex transformation that was inclusive of a wide range of views and opinions. Beginning in October 2006 the NNSA published its first Notice of Intent, which outlined the initial draft of the Complex Transformation proposal. After digesting 33,000 written requests and conducting 12 separate hearings at each site, the NNSA published the Supplemental Programmatic Environmental Impact Statement in December 2007, which incorporated several recommendations from the public comments.

9|2.E (cont.)

While the National Environmental Policy Act requires a 45 day minimum comment period, the NNSA has provided 90 days for review and comment since its release and in the end will have conducted 20 community meetings nationwide, including 7 hearings in New Mexico. I also appreciate the fact that you expanded the site hearings to include Espanola, New Mexico, a community that contributes heavily to the laboratory workforce and its success as a scientific center of excellence.

Taken together the Department has gone out of its way to solicit and accommodate input from the public. I trust that it will take these comments into account as it moves forward, acting on them where appropriate as it has done in the past.

Dorinson, Cathleen
Page 1 of 1

Dear Mr Leyka

1|16A; 2|7F; 3|1E

Please shrink our overstreed nuclear stockpile & concentrate on maintaining security at our existing weapons rather than making any new ones. Abide by the Comprehensive Test Ban Treaty!

Cathleen Dorinson

Ms. Cathleen K. Dorinson
PO Box 267
Pt Reyes Sta, CA 94956

PC_910

Dorre, Lawrence

Page 1 of 1

PC_1789

Levens, Matthew

From: Lawrence Dorre [ldorre@dcn.org]
Sent: Sunday, March 30, 2008 9:53 PM
To: Complex2030
Subject: Reject "Complex Transformation" plan to build nuclear weapons

Lawrence Dorre
1213 Drexel Drive
Davis,, CA 95616-2122

March 30, 2008

Theodore A Wyka
Complex 2030 SEIS Document Manager
Office of Transformation, U.S. Department of Energy, NA–10.1 1000 Independence Avenue, SW.
Washington, DC 20585

Dear Theodore Wyka:

The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal.

1|14O Complex Transformation is going to lead to more nuclear tests. We have damaged our environment immeasurably by past nuclear tests and we haven't learned yet how to clean up the mess effectively.

2|1F When are we going to get serious about nuclear disarmement and about our own responsibiliries under the Nuclear Non-Proliferation Treaty? One day, given time, we will suffer a nuclear tragedy that will dwarf Hiroshima, if we don't get rid of nuclear arms for good. How can we expect Iran, North Korea or others we consider rogue states to behave responsibly on this matter if we ourselves are unwilling to do so?

3|1J By building up its nuclear arsenal right now, the US is essentially telling the world, "Do as I say, not as I do."

Sincerely,

Lawrence Dorre
530 756 9619

1

Dotson, Robert

Page 1 of 1

PC_704

Levens, Matthew

From: Robert Dotson [Rdotson@TDS.NET]
Sent: Saturday, March 01, 2008 2:05 PM
To: Complex2030
Subject: Complex Transformation

Dear Sirs:

I have been a resident of and practiced medicine in Oak Ridge for more than twenty-five years. Because I was unable to attend the recent hearing in Oak Ridge concerning this matter, I wanted to take this opportunity to register my thoughts concerning the various "Complex Transformation" proposals under consideration.

1|16A Let me be brief and to the point. We do NOT need more bomb plants nor do we need jobs based on this insanity. While our country is decrying the alleged attempts of other
2|1F nations to build nuclear devices, we are continuing to violate the Nuclear Proliferation Treaty - and, apparently, at an accelerating pace! We demonstrate no regard for
3|1J international law in our foreign policy, so why should others?

1|16A (cont.) 4|9B This proposed modernization of our nuclear weapon plants is immoral and, frankly, insane. We need to be figuring out how to use our resources for the betterment of mankind, not for bringing about Armageddon.

In Peace and Hope...
Robert S. Dotson, M.D
200 New York Avenue
Suite 130
Oak Ridge, Tennessee
37830

(865)483-6399 office
(865)483-6396 fax

1

Dotterer, Carol
Page 1 of 1

PC_45

Mr. Wyka- I'm writing to you to urge you to please NOT construct a new bomb complex in Oak Ridge, TN. This is pure nuclear proliferation an d it makes our country/ our world LESS SAFE not more!!!!!!!!!!!!!!!!!

As concerned citizens, we say NO-this is NOT responsible, intelligent action. It will haunt us in years to come if we decide wrong-

Please do the right thing-thank you.

Sincerely
Carol Dotterer
Ruth Kirk

1|16A 2|13A 3|13A-1

Doubleday, Jay
Page 1 of 1

PC_1378

Levens, Matthew

From: Jay Doubleday [jdoubled@ktc.com]
Sent: Thursday, February 21, 2008 7:37 PM
To: Complex2030
Subject: Nuclear disarmament, not new weapons

Jay Doubleday
1559 Indian Creek Loop
Kerrville, TX 78028-1766

February 21, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

2|1J I am also opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal.

Building this new plant would send a contradictory message to other countries, such as Iran, who may be seeking nuclear weapons. While the U.S. is asking others to forego developing nuclear arsenals, we are simultaneously trying to increase our own capacity to build new nuclear weapons.

The United States should accept the recommendaation of four distinguished political leaders (George P. Schultz, Willam J. Perry, Henry A. Kissinger and Sam Nunn), who recommended in 2007 and again in 2008, that there be a "global effort to reduce reliance on nuclear weapons, to prevent their spread into potentially dangerous hands, and ultimately to end them as a threat to the world."

3|1F The United States and other nuclear powers promised to work toward a nuclear-free world when the anti-proliferation treaty was ratified in 1968. It is high time that more progress be made in that direction. No additional nuclear weapons!

Sincerely,

Jay Doubleday
830-896-5418

1

Dougherty, Greg
Page 1 of 1

PC_1838

Levens, Matthew

From: politics@molsoft.net
Sent: Friday, April 04, 2008 8:26 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

Hello Sir,

15A Please ignore everything these idiots at Credo are blasting at you. I strongly support making a new generation of nuclear weapons, and I'm glad you're working on that.

Sincerely,
Greg Dougherty
Heller Dr
Santa Cruz,, CA 95064

cc:
Senator Dianne Feinstein
Senator Barbara Boxer
Representative Sam Farr

1

Dow, Jerry
Page 1 of 1

Jerry Dow

Bureaucracies and Metrics
Addressing Real Change PC_1052

1|1K Traditionally, bureaucracies replace the original mission for which they were founded with a new mission of protecting the structure, the budget, the habits, and the culture of the bureaucracy as it has currently evolved. That is why it is so difficult to achieve real change when a bureaucracy is no longer achieving its original mission. In such cases, it takes tremendous leadership and cheerful persistence to insist on real change. It also makes effective use of metrics critical. Metrics requires a profound commitment to the principle that the mission of the system defines its shape and its habits. This allows senior leaders to shine the light of reality on the areas in which the bureaucracy has substituted its own comfort and self-protection for achieving the mission for which it exists and for which it is being paid.

While there is something powerful and productive about the concept of evidence-based government that uses metrics developed by senior leadership to measure progress, identify problems, and lead the team in developing new strategies and new solutions, it is not magic. It simply takes a combination of leaders with determination and courage and professional experts with deep knowledge of their subject and of the system they are trying to improve.

Bureaucracies
White House
Congress
NNSA/DOE including site offices
DOD
Contractors (Plants + Labs)
Contracts
DNFSB + other regulators
Grey Beard panels (review groups)

Livermore, CA

Drake, Kelly
Page 1 of 1

PC_2028

Levens, Matthew

From: KELLY DRAKE [seminary012@aol.com]
Sent: Monday, April 14, 2008 5:45 PM
To: Complex2030
Subject: STOP STOP

KELLY DRAKE
500 pasco st
bald knob, AR 72010-3411

April 14, 2008

Complex Transformation Department of Energy

1|16A Complex Transformation Department of Energy:

I OPPOSE BOMBS. STOP IT!!

Sincerely,

KELLY DRAKE

Drake, Kelly
Page 1 of 1

PC_1421

Levens, Matthew

From: KELLY DRAKE [seminary012@aol.com]
Sent: Tuesday, April 15, 2008 9:12 PM
To: Complex2030
Subject: STOP IT

KELLY DRAKE
500 pasco st
bald knob, AR 72010-3411

April 15, 2008

Complex Transformation Department of Energy

1|16A Complex Transformation Department of Energy:

STOP THIS NOW STOP!!

Sincerely,

KELLY DRAKE

1

Dreicer, Jared
Page 1 of 1

PC_1074

Buenaflor, Delight

From: Jared Dreicer [jdreicer@lanl.gov]
Sent: Wednesday, March 12, 2008 4:37 PM
To: DIV.Complex.Transformation
Subject: Form Post from Firefox

Last Name=Dreicer
First Name=Jared
Email Address=jdreicer@lanl.gov
Street Address=1321 Sage Loop
City=Los Alamos
State=NM
ZIP Code=87544
Comments=I fully support the NNSA's preferred alternative for Complex transformation, in particular the role for Los Alamos. As a native New Mexican (born and raised in Los Alamos) I understand the importance of the Laboratory from both a global and national security perspective and for its important contribution to the economic health of northern New Mexico. The preferred alternative is the best approach for the nation to decrease the number of nuclear weapons while addressing environmental concerns, and resolving fiscal funding constraints.

-- 1|15A

****

Jared S. Dreicer, Ph.D.
Senior Technical Advisor, PADSTE
Voice: 505-667-0005 Fax: 505-667-5450

PO Box 1663, MS A127
Los Alamos National Laboratory
Los Alamos, NM 87545

(If foreign correspondence: TSPA)

****

1

Dreyer, M.L.
Page 1 of 1

PC_231

21710 Sussex
Oak Park, MI 48237
13 March 2008

Mr. Theodore Wyka,
Complex Transformation SPIES Document Mgr.
U.S. Department of Energy
1000 Independence Avenue SW
Washington, D.C. 20585

Dear Mr. Wyka,

1|16A As a U.S. citizen and registered voter, I am writing to express my strong opposition to the draft proposal named "Complex Transformation".

2|1F Does the Nuclear Non-Proliferation Treaty still exist? If so, why are we even talking about this proposal?

3|14O I am concerned about the negative environmental impact of "Complex Transformation", including the waste of time, money and energy that it would entail.

The proponents of this proposal need to simmer down and stop using up our resources on their expensive war games.

Sincerely,

M.L. Dreyer

Driessen, Joseph
Page 1 of 1

PC_1105

Levens, Matthew

From: joedriessen@aol.com
Sent: Saturday, March 29, 2008 8:04 PM
To: Complex2030
Subject: Draft Complex Transformation SPEIS Comments

Theodore Wyka:

1|16A I am writing this letter to voice my strong opposition to "… rebuilding the entire nuclearweapons complex with new facilities for maintaining an enduring stockpile of nuclear weapons… and designing, producing, and testing thermonuclear weapons of mass destruction" (DOE Proposal).

2|20; 3|1J The Second Vatican Council document, (The Pastoral Constitution on the Church in the Modern World, No. 8l states: The (nuclear) arms race is one of the greatest curses on the human race, an act of aggression against the poor and a folly which does not provide the security it promises" If we build this new complex we will stimulate and heighten the nuclear arms race and make the world a much more dangerous place for all peoples. We will only he heading more speedily to world annihilation! What folly! What madness! The U.S. signed the Nuclear Non-Proliferation Treaty and that is what we need to work for – an end to all nuclear weapons throughout the world. Complex Transformation is the wrong way to go.

2|20 (cont.) In 1983 the U.S. Catholic Bishops made clear nuclear weapons can never be used. They offered a "strictly conditioned moral acceptance " of nuclear deterrence as an interim not long-term policy. They strongly stated that it must be a step on the way toward progressive disbarment".

1|16A (cont.); 3|1J (cont.) As a member of Pax Christi USA I strongly agree with and support their Statement "Gods Promise Endures: The Challenge of Peace Today." It states in part "As Catholic Christians and followers of the nonviolent Jesus, we reject this "institutionalization of nuclear deterrence as nothing less than nuclear terrorism" and "We call on the Bush Administration to abandon the $150 billion Complex Transformation program as a provocative and unnecessary invitation of a new nuclear arms race, and as such, an unconscionable theft from the poor as articulated in Vatican11."

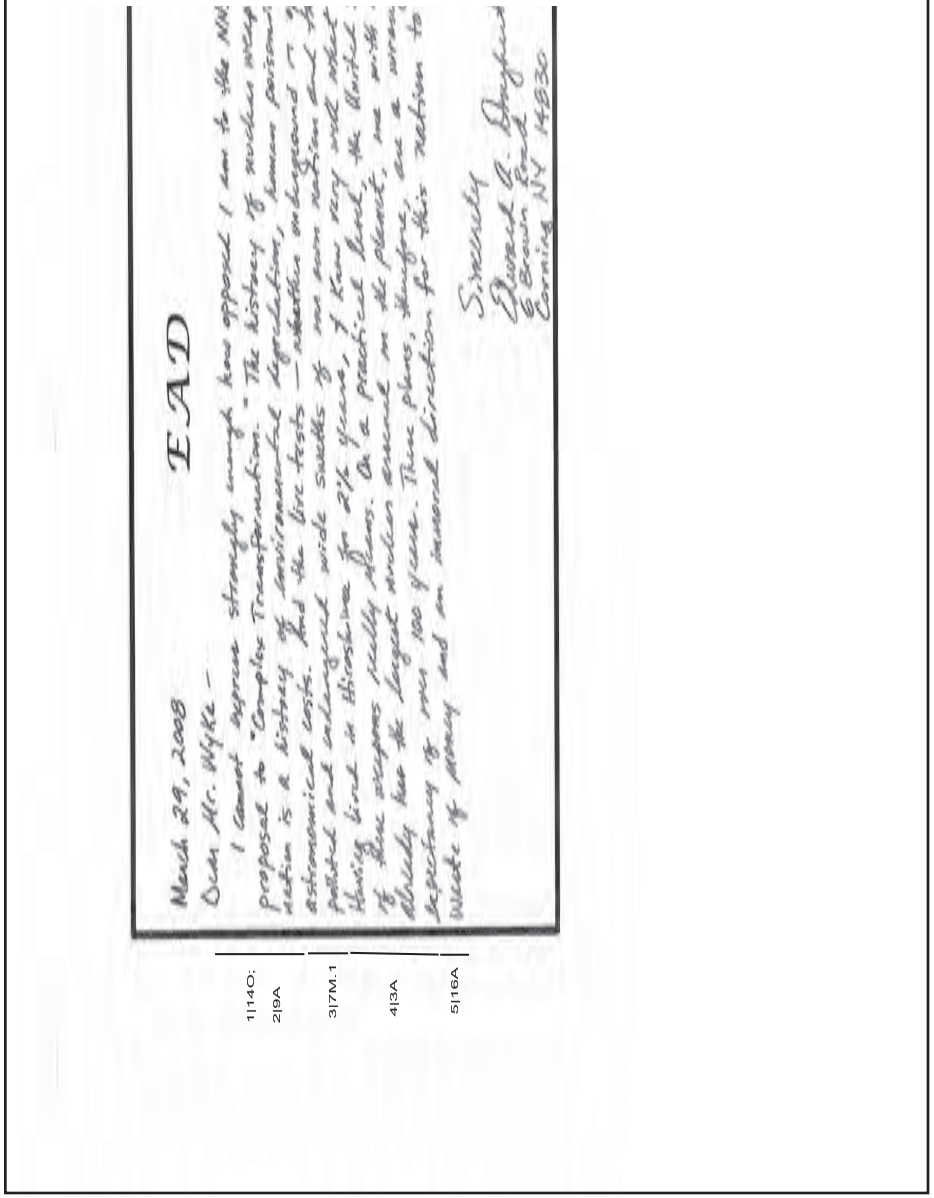
2|20 (cont.) It is immoral to contemplate, plan for, or create the means of destruction of all life and hold the world hostage to that threat through U. S., domination.

Sincerely,

Joseph G. Driessen SFO

Planning your summer road trip? Check out AOL Travel Guides.

Drugharty, Edward
Page 1 of 1



5/15/2008

Dudley, Cosette
Page 1 of 1

PC_303

Re: Department of Energy
"Complex Transformation"
Office of Transformation
NA-10.1

Cosette Dudley
51 Catalpa Drive
Atherton, California 94027

March 13, 2008

Dear Mr. Wyka - Department of Energy,

1|16A — It is my firm opinion that the United States does not need to design new types of nuclear weapons or produce new warheads; the so called "Complex Transformation" program should not be pursued. Since America is

2|1J — attempting to prevent other nations's development of nuclear weapons, we should curtail rather than change and expand our own; therefore "Complex Transformation" is counter-productive. It is/would be an incitement to other nations to build their own. America would be much more secure if we encouraged the

3|13A.1 — elimination of nuclear weapons, starting by getting rid of some of the many thousands we maintain, and not beginning any new developments of others.

1|16A(cont.) — It appears to me that America at this time is heading into a Cold War mentality, and this should be stopped, not encouraged. We do not need to rebuild, revamp or add to our already large nuclear stockpile. Complex Transformation should not go forward.

Sincerely,
Cosette A. Dudley

Duncan, John
Page 1 of 3

PC_18

FEB-26-2008 15:43 FROM:DUNCAN KO 8655448708 TO:7039319222 P.1/3

JOHN J. DUNCAN, JR.
2nd District, Tennessee

2207 Rayburn House Office Building
Washington, DC 20515-4202
Phone: (202) 225-5435
Fax: (202) 225-6440

800 Market Street, Suite 110
Knoxville, TN 37902
Phone: (865) 523-3772
Fax: (865) 544-0720

707 East Broadway
Maryville, TN 37804-5762
Phone: (865) 984-5484
Fax: (865) 984-0521

6 East Madison Avenue Courthouse
Athens, TN 37303-4297
Phone: (423) 745-4611
Fax: (423) 745-8029

Congress of the United States
House of Representatives
Washington, DC 20515-4202

COMMITTEES
TRANSPORTATION AND INFRASTRUCTURE
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Aviation
Highways and Transit
RESOURCES
SUBCOMMITTEES
National Parks, Recreation, and Public Lands
Forests and Forest Health
GOVERNMENT REFORM
SUBCOMMITTEES
National Security, Emerging Threats and International Relations

FACSIMILE COVER SHEET
CONGRESSMAN JOHN J. DUNCAN, JR.
KNOXVILLE DISTRICT OFFICE

DATE: February 26, 2008
TO: MR Ted Wyka
FROM: Rep John J. Duncan, Jr. (Jonathan Griswold)
SUBJECT: Y-12 SPEIS

PAGES TO FOLLOW: 2

NOTES:

IF YOU DO NOT RECEIVE THE CORRECT NUMBER OF PAGES, PLEASE CONTACT THE APPROPRIATE PERSON AT (865) 523-3772

E MAIL: www.house.gov/writerep PRINTED ON RECYCLED PAPER HTTP: www.house.gov/duncan

Duncan, John
Page 2 of 3

FEB-26-2008 15:43 FROM:DUNCAN KO 8655440720 TO:7039319222 P.2/3

JOHN J. DUNCAN, JR.
2nd District, Tennessee

2207 Rayburn House Office Building
Washington, DC 20515-4202
Phone: (202) 225-5435
Fax: (202) 225-5640

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Phone: (865) 984-5444
Fax: (865) 984-5021

3 East Madison Avenue Courthouse
Athens, TN 37303-4227
Phone: (423) 745-4671
Fax: (423) 746-9035

Congress of the United States
House of Representatives
Washington, DC 20515-4202

COMMITTEES
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Highways and Transit - Ranking Member
Water Resources and Environment
Aviation

NATURAL RESOURCES
SUBCOMMITTEE
National Parks, Forests, and Public Lands

OVERSIGHT AND GOVERNMENT REFORM
SUBCOMMITTEES
National Security and Foreign Affairs
Government Management, Organization, and Procurement

February 20, 2008

Mr. Ted Wyka
National Nuclear Security Administration
NA-10.1
1000 Independence Avenue, SW
Washington, D.C. 20585

Dear Mr. Wyka:

I am pleased to write you in support of the Y-12 National Security Complex and hope my comments will be included in the National Nuclear Security Agency's (NNSA) Complex 2030 Programmatic Environmental Impact Statement.

1|15A
2|10I

Oak Ridge, Tennessee has been home to the Department of Energy (DOE) since the Manhattan Project. During this time, our Nation's nuclear policy has changed in many ways, and each time the dedicated staff of Y-12 has always met all the needs of DOE's mission. This region stands ready to continue to do so.

Y-12 is an integral part of our Nation's nuclear weapons complex, and has manufactured components of every weapon in our nuclear arsenal. Y-12 also has the distinction of being recognized as the U.S. Center of Excellence in Uranium, and I am aware that Complex 2030 supports that mission. In fact, Y-12 is often referred to as The Fort Knox of enriched uranium.

1|15A (cont)

I fully support the Department's transformation plans to make the nuclear weapons program smaller, more responsive, and safer.

As modernization efforts progress across the DOE complex, I encourage DOE and NNSA to complete construction on the special materials storage facility at Y-12.

1|15A (cont)

Y-12 is well positioned to meet any challenge and accomplish any mission from DOE and NNSA. This region is also prepared to work with DOE's Environmental Management office to meet the clean up needs at Y-12.

E-MAIL: www.house.gov/wyrring PRINTED ON RECYCLED PAPER HTTP://www.house.gov/duncan/

Duncan, John
Page 3 of 3

FEB-26-2008 15:44 FROM:DUNCAN KO 8655440720 TO:7039319222 P.3/3

1|15A (cont.)

As DOE and NNSA move forward with Complex 2030, it is my sincere hope that you carefully consider Y-12's record of distinction.

With kindest regards, I am

Yours truly,

JOHN J. DUNCAN, JR.
Member of Congress

JJD:jg

Dunham, Robert
Page 1 of 2

PC_705

Levens, Matthew

From: Robert Dunham [rob.dunham@e2.com]
Sent: Wednesday, March 19, 2008 4:40 PM
To: Complex2030
Subject: Comment in favor of SPEIS preferred Alternative

Attachments: Comment for Complex Transformation SPEIS.doc

Comment for
plex Transforr

Attached please find my comments in favor of the Complex Transformation Preferred alternative, and the timely documentation of a ROD to allow implementation.

Rob Dunham
E2 Consulting Engineers, Inc.
NM/ TX Operations Manager
183 Central Park Square
Los Alamos, NM 87544
E2: 505-661-6601
LANL Site Office: 505-665-3638
Cell: 505-690-3693
rob.dunham@e2.com

1

Dunham, Robert
Page 2 of 2

PC_705

Comment for Complex Transformation SPEIS

I am a subcontractor working within the nuclear weapons complex, but more importantly I am the father of two active teenage boys.

Our family enjoys and respects the rights, freedoms, and safety afforded us by our national security programs including our nuclear deterrents.

I wish to be recorded as very much in support of the preferred alternative to establish and maintain distributed centers of excellence for the weapons complex, and maintain R&D efforts.

I ask that you make a timely conclusion to move toward a record of decision (ROD) to allow implementation of the preferred alternative.

My income and the health and safety of my children depend on the results of such a ROD which provides for:

1|7N
2|15A

- The Ability of DOE/NNSA to properly secure all attractive SNM
- The efficient use of personnel with special skills, and costly clearances
- The efficient use of limited operations and capital funds
- The efficient use of government controlled lands
- The sustainable commitment to reduce active footprint of nuclear facilities
- The sustainable commitment to clean-up un-used facilities
- The sustainable commitment to establish, utilize and maintain modern facilities and technologies to better protect the health and safety of the committed workforce, the off-site individuals, and the environment.

3|14.0 The plans addressed in the EIS should be applauded for providing a path to reduce the current weapons complex impact on the environment.

This effort in establishing a plan for the next generation of the nuclear complex is a great step forward. It will not appease those who would like to see an end to the nuclear weapons, and the magical elimination of tons of plutonium. Yet, it is a great step in acknowledging the need for NNSA/DOE to be better stewards of our planet.

Robert Dunham
160 Kendall Drive
Los Alamos, NM 87544
505-672-2267

Dunn, Terri
Page 1 of 1

PC_1581

Levens, Matthew

From: blazingcolors@gmail.com
Sent: Saturday, April 05, 2008 10:43 AM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|16A We do not want new nuclear weapons - we want to feed starving children. HELLO?

Sincerely,
Terri Dunn
P.O. Box 7342
Ruidoso, NM 88355

cc:
Senator Pete Domenici
Senator Jeff Bingaman
Representative Steve Pearce

1

Duport, Susan
Page 1 of 1

PC_1235

Levens, Matthew

From: Susan Dupont [b000632sd@sbcglobal.net]
Sent: Saturday, March 29, 2008 9:03 PM
To: Complex2030
Subject: Proposed Nuclear Weapons Buid-up

Susan Dupont
6861 Crocus Court; #4
Greendale, WI 53129-2344

March 29, 2008

Complex Transformation

Dear Complex Transformation:

1|1O Lets move forward, not backward, as the plan for rebuilding our potential for nuclear weapon build-up proposes. We invaded Iraq because of what was said to be their possession of weapons of mass destruction.

How can we justify developing the capacity for build-up of more weapons of mass destruction ourselves? If invading another country is justifiable because of their alleged possession of weapons of mass destruction, are we not asking for invasion from other countries ourselves, especially by increasing the likelihood of a build-up of the stockpile we already have?
Not only that, if the proposed plan is accepted, we are encouraging other countries to develop more nuclear weapons, either to maintain the balance of power or to use them against this country in a preemptive war.

2|9B We should continue efforts to reduce nuclear stockpiles and stop further development of nuclear capabilities worldwide. The billions of dollars could be put to moral uses, and for the advancement of mankind, not for the destruction of mankind.

3|16A I appeal to you to accept the challenge to build a better world and to stop the proposed plan for expansion of nuclear capabilities and support continued efforts to reduce nuclear stockpiles.

Sincerely,

Susan Dupont

Sincerely,

Susan Dupont

Durante, Tom
Page 1 of 1

PC_1247

Levens, Matthew

From: Tom Durante [mario@gbis.com]
Sent: Saturday, March 29, 2008 5:21 PM
To: Complex2030
Subject: Nuclear Weapons Program

Tom Durante
1075 West 12th St.
Reno, NV 89503-2604

March 29, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I am writing to you today to voice my opposition to the proposal to build a plant for the production of plutonium pits. It is my understanding that this would be for the eventual development of nuclear weapons. While the United States is telling other countries not to
2|1J build nuclear weapon plants, to do so ourselves would be contradictory as well as an invitation for other countries to build their own nuclear arsenal.

1|16A (cont) Again, I write to you today as a Nevadan against this proposal.

Thank you for your time and efforts.

Sincerely,

Tom Durante, LCSW
775-787-6564

1

Durnan, J
Page 1 of 1

PC_1373

Levens, Matthew

From: J. Richard Durnan [durnanjr@earthlink.net]
Sent: Tuesday, April 29, 2008 6:09 PM
To: Complex2030
Subject: Stop the CMRR Project

J. Richard Durnan
3650 26th Place West #402A
Seattle, WA 98199-2128

April 29, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|13A.1 If there is one thing that we have learned since we first used nuclear weapons in 1945, it is that they make the world an infinitely more dangerous place.

2|16A There is absolutely no justification for our country to restart the manufacture of nuclear weapons. Were we true to our most dearly-held values, we would be dismantling our nuclear arsenal.

Only by eliminating our nuclear weapons can we lead the world to nuclear disarmament. To go in the opposite direction, as proposed by the Bush administration, is to insanely prepare the way for a disastrous future.

2|16A (cont.) Please follow the sane and humane course of action: do everything in your power to stop the CMRR project.

Thank you.

Sincerely,

J. Richard Durnan
206-282-4454

1

Dygert-Gearheart, Anita
Page 1 of 1

PC_281

March 27, 2008

Theodore Wyka
Complex Transformation SPEIS Document Manager
U.S. DOE
1000 Independence Ave. SW
Washington D.C. 20585

Dear Mr. Wyka,

As a 63 year old citizen of the USA,
1|1F I respectfully ask that my country
abide by the 1970 Nuclear Weapon
Non-Proliferation Treaty. Specifically,
I am requesting that new nuclear
weapons facilities not be built at
Oak Ridge, Tennessee or Los Alamos.
2|16A I want my country to be the
leader in the elimination of the potential
use of nuclear weapons and the
destruction of Mother Earth.

Sincerely,
Anita Dygert-Gearheart
adygertgearheart@hotmail.com
PO Box 3124 Ashland, OR 97520

Dyke, James
Page 1 of 1

PC_1059

Written comment for the public hearings in New Mexico to receive input as part of the National Environmental Policy Act (NEPA) process to support NNSA complex transformation.

James Dyke
jdyke@att.net
2005 Calle de Sebastian, Santa Fe, NM 87505

1|15A Given that the United States includes nuclear weapons as part of the national security posture, it is necessary to have the resources, facilities and workforce to meet this national mission. As a native of New Mexico and a resident of Santa Fe, I fully support the decision by NNSA to name Los Alamos National Laboratory as the Center of Excellence for Plutonium. This decision will leverage the existing capabilities at LANL and will continue LANL's leadership in plutonium science.

The most important resource is the workforce. LANL has attracted both from within New Mexico and throughout the nation, talented scientists, technologists and engineers with the skills and knowledge to work safely with plutonium to meet the programmatic needs. It is imperative that NNSA continues to provide facilities that meet current safety practices so that the LANL workforce can carryout these missions, including the completion of both buildings of the CMR Replacement Project.

Thank you for the opportunity to provide this input.

James Dyke

Los Alamos, NM (PM)

Dziak, John

Page 1 of 1

PC_1779

Levens, Matthew

From: Physicians for Social Responsibility [webmaster@psr.org] on behalf of John Dziak [jjd264@psu.edu]
Sent: Friday, April 04, 2008 2:59 PM
To: Complex2030
Subject: Please do not produce new nuclear warheads

Apr 4, 2008

Mr. Theodore Wyka
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Wyka,

1|16A Please accept this comment on the Draft Complex Transformation PEIS (DOE/EIS-0236-S4). I wanted to write to ask that whatever plan is finally adopted regarding "Complex Transformation," not entail the production of any new nuclear warheads, even as replacements.

2|1J I feel that the production of new warheads would be a terrible blow to international nonproliferation efforts. The United States would basically be telling Iran, North Korea, Pakistan, India, and everyone else to "Do as we say, not as we do," and "we're allowed to have these weapons because our country is good, but we won't let you have them." For this we would most likely be despised as hypocrites, not honored as leaders or peacekeepers, and other countries will want to build up their stockpiles. Furthermore, we would risk re-starting the Cold War. After all, the enemies our soldiers are currently actually fighting are stateless terrorist bands, to which a nuclear deterrent seems useless -- so China and Russia will see our renewed arsenal as really threatening them

instead. So far from improving America's security, we will indirectly imperil the human race by furthering the spread of war and destruction.

3|14O These might seem like geopolitical concerns rather than environmental ones, but I think that in a broad sense nuclear weapons are the ultimate environmental threat. Thank you so much for your consideration of this extremely vital issue.

Sincerely,

Dr. John Dziak
110 E Foster Ave Apt 314
State College, PA 16801-4926

1

Dzindzeleta, Mercedes

Page 1 of 1

PC_1906

Levens, Matthew

From: Mercedes Dzindzeleta [mrdztea@gmail.com]
Sent: Tuesday, February 19, 2008 6:32 PM
To: Complex2030
Subject: NO more war ....

Mercedes Dzindzeleta
611-1/2 7th Street
Racine, WI 53403-1129

February 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I need you to oppose any proposal to build more nuclear weapons. And to oppose building a plant to produce nuclear weapons.

NO nuclear weapons. NO more nuclear usage. NO more nuclear waste.

Oppose any and all efforts to build nuclear weapons and plants.

Sincerely,

Mercedes Dzindzeleta
262 632 2986

1

Eagleson, Mary
Page 1 of 1

PC_662

Levens, Matthew

From: MLEagleson@aol.com
Sent: Sunday, March 16, 2008 4:26 PM
To: Complex2030
Cc: nita.lowey@mail.house.gov; Senator_Clinton@clinton.senate.gov; senator@schumer.senate.gov
Subject: Comments on Complex Transformation

To Whom It May Concern:

1|16A
2|1J

I am deeply concerned about the plans to build a new facility for the production of nuclear weapons triggers. Rather than replacing the ageing U.S. nuclear arsenal, we should be negotiating the reduction in weapons numbers around the world.

How can we insist that countries like Iran and Korea not build nuclear weapons when we, who still have more than enough to destroy the world, are planning to build more? Likewise, how can we encourage India and Pakistan to back away from nuclear brinkmanship if we are upgrading our arsenal?

Sincerely,
Mary Eagleson
113 Greenacres Ave.
White Plains NY 10606

It's Tax Time! Get tips, forms and advice on AOL Money & Finance.

Eastes, Glen
Page 1 of 2

PC_11 2-29-08

Mr. T. Wyka

I see in the paper - Knoxville News Sentinel that there is some discussion about the Y-12 plant at Oak Ridge, TN.

1|16A
1. I see no need for anymore atomic weapons.

2. We do need some more power in this county at several locations.

2|1N
3|9B
3. We have several navy ships that are nuclear powered. Is it possible that some of these units could be built and installed at locations that have the water supply necessary. Maybe Oak Ridge could build these.

4. What I would really like to see at Oak Ridge is a huge shoe factory. If China gets mad at us, we are barefoot in 6 months. over

Eastes, Glen
Page 2 of 2

5. I am serious. I am 80.

Glen Eastes
4993 Fairview
Lenoir City TN
37772

MS Mathematics
Purdue University
1963

2937
OL
LB
3b977

L 1977

Eastley, Joni
Page 1 of 3

PC_1039

I am Joni Eastley, Chairman of the Nye County Board of Commissioners. I'm proud to represent Nye County District II, in which lies the Town of Tonopah and the Tonopah Test Range. Ninety-seven (97) percent of Nye County lands are subject to federal agency controls, most of which are the Nevada Test and Training Range, home of NNSA's Tonopah Test Range facilities, and the Nevada Test Site. Both have had a significant impact on our economy. We have for example, been subject to several federally-induced boom and bust cycles.

Our county has served the nation's defense needs at every turn. We were home to aircrew training in WWII, nuclear weapons testing since the 1950s, considered as the home for MX, host to the Stealth Fighter program when it was classified and the designated site for the Nation's geologic repository for nuclear waste. We have yet to shy away from doing our patriotic duty. All that we have ever asked is that we be treated with fairness and respect.

Nye County will be submitting formal, written comments on the Complex Transformation. My remarks today will update those that I provided at the Tonopah and Las Vegas hearings and summarize our county's position on this proposed action.

We appreciate that the multifaceted Complex transformation was made as simple as possible in the Draft Complex Transformation PEIS. With several different alternatives to consider, I know that this was a difficult task. Obviously, Nye County has preferences among those alternatives, and we want you to know what they are.

During the public scoping meetings, emphasis was placed on the environmental impacts, which of course are important. My responsibility, though, is to anticipate and respond to potential impacts that result from the final selection of any of the alternatives that don't include "No Action". Faced with the risks and opportunities, Nye County contracted last year with the Center for Economic Development at the University of Nevada to produce a report on the estimated economic impacts on northern Nye and Esmeralda Counties. I will leave a copy today.

Washington DC

Eastley, Joni
Page 2 of 3

certainly have the room. The combination of the N11K and the N15 represents one of the largest unpopulated land areas in the United States, comprising more that 3.5 million acres. And we have the trained construction and operations workers.

Second: Your own sanctioned independent analysis concludes that the TTR is the best place to do this work. Why would you do anything else? The conclusion from NNSA's *Independent Business Case Analysis of Complex Transformation Flight Test Facilities* report states; "Considering the collective impacts of cost (using the cost standard deviation) and mission risks, the most favorable alternative for both periods is to upgrade the TTR with HTM, reduce the number of structures to a minimum, and institute campaign operations whereby the TTR is fully active part of the year and in custodial standby for the remainder (Alternative 2.2.2)." Again, why are you considering options that are not consistent with the judgment of your esteemed independent panel of experts?

I note that the "Operate TTR in Campaign Mode" alternative would still entail the loss of jobs at TTR. We oppose this action based, obviously, on the loss of jobs, but my constituents and I would appreciate a more detailed explanation of "Campaign Mode" and how you would make that function as well as how you would minimize the jobs that would be lost. Current operations include "work for others" that offset, at least in part, overall costs to NNSA. When you account for the business case analysis conclusion, why would we even consider alternatives that have the potential to compromise the safety, surety and reliability of our nuclear arsenal, for what one of my constituents noted is "...less than the salary of one mediocre professional baseball player..." or, about $7 million-- a good portion of which is offset by your "work for others program".

2|16A

Eastley, Joni
Page 3 of 3

rescue team, volunteer firefighters and EMTs. These are mentioned in the PEIS. What isn't mentioned are the number of spouses who volunteer with the PTA or are teachers in our local schools. They operate family-owned businesses. They fill critical positions in our county and state offices. In short, the direct and indirect impact of discontinuing NNSA operations at TTR would be devastating to the Tonopah economy and way of life, and put at risk the continued viability of the seat of Nye County government.

If however, the only alternative is for the migration of any and all other NNSA activities to the NTS, then I have no choice but to support it, because the jobs will stay in Nye County. However, it is essential that all reasonable and responsible efforts be undertaken to ensure that this migration accrue to the benefit of Nye County, home to every square inch of the Nevada Test Site, as opposed to the long-standing injustice that has ensured that the majority of federal investment migrate to Clark County, who bears no burden in return for this benefit.

1|15A (cont)

Again, I appreciate the opportunity to once again submit comments for the record. Nye County's more comprehensive written comments will address the issues I've touched on in greater detail and will be provided prior to the closure of the comment period.

I will close with an admonition. In the context of our overall national security needs, nuclear weapons remain the ultimate foundation. If TTR is the best place for flight testing gravity delivered nuclear weapons then why – to paraphrase Benjamin Franklin - Any society that would give up a little national security to gain a little money will deserve neither and lose both.

Eastley, Joni
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PC_1076

NYE COUNTY

Board of County Commissioners
Nye County
Tonopah, Nevada

Tonopah Office
101 Radar Road
Tonopah, NV 89049
Phone (775) 482-8191
Fax (775) 482-8198

April 1, 2008

Mr. Theodore A. Wyka
Complex 2030 SEIS Document Manager
Office of Transformation
US Department of Energy
1000 Independence Ave., SW
Washington, D.C. 20585

Dear Mr. Wyka:

Nye County appreciates the opportunity to comment on the Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement (DOE/EIS-0236-S4). We support the efforts of DOE to enhance the Stockpile Stewardship program to ensure that the nation's nuclear arsenal is sufficiently safe, secure, and reliable to meet national security objectives, but take strong exception to the preferred alternative to close the Tonopah Test Range.

1|15A
2|7N
3|6C

As the situs jurisdiction for the NTS and TTR, Nye County has a long history of supporting DOE activities at these sites. All we have ever asked is that we be treated with fairness and respect as we serve the nation's defense needs. Primary among our requests is that we not lose any jobs when the DOE issues its final ruling on the transformation plan. We need those jobs, Mr. Wyka. We have endured the long-standing injustice that has ensured that the majority of federal investment in these sites has migrated to Clark County, who bears no burden in return for this benefit. To further punish a community and county that have served the nation's defense needs at every turn would be the ultimate betrayal.

4|14I

As I stated during the public hearings in Tonopah, Las Vegas and Washington, D.C., we would like to be selected to receive the CNPC with its 4,500 operations workers. We certainly have the room. The combination of the NTTR and the NTS represents one of the largest unpopulated land areas in the United States, comprising more that 3.5 million acres. We also have the trained construction and operations workers.

5|10D
6|5D

While I will not repeat each point that I made during the public hearings, I cannot overlook the fact that the *Independent Business Case Analysis of Complex Transformation Flight Test Facilities*, prepared for NNSA, December 2007 (page vi), states:

08-0060IE

Eastley, Joni
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Mr. Theodore A. Wyka
April 1, 2008
Page 2

3|6C (cont)

Considering the collective impacts of cost (using the cost standard deviation) and mission risks, the most favorable alternative for both periods is to upgrade the TTR with HTM, reduce the number of structures to a minimum, and institute campaign operations whereby TTR is fully active part of the year and in custodial standby for the remainder (Alternative 2.2.2).

3|6C (cont)

Nye County agrees with this analysis; it is obvious that not only is the TTR the best place to do this work, but there would be no risk to mission objectives which, as you know, cannot be said of any of the other alternatives. Of the seven alternatives under consideration, only those that recommend upgrading the TTR fall into the "green" category. To additionally quote the business case analysis: *"Closure of TTR may be regretted if more rigorous NNSA testing requirements surface in the future."*

3|6C (cont)
4|14I (cont)

While the town of Tonopah and Nye County needs the jobs, America, in the context of our overall national security needs, requires safe, reliable testing of the devices that remain the ultimate foundation of that security.

Sincerely,

Joni Eastley

Joni Eastley, Chairman
Nye County Board of County Commissioners

08-0060IE

Ebbitt, Joan

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PC_1819

Levens, Matthew

From: MJEbbitt@aol.com
Sent: Friday, March 28, 2008 10:57 AM
To: Complex2030
Subject: (no subject)

March 28, 2008 Theodore Wyka Complex Transformation SPEIS Document Manager U.S. Department of Energy 1000 Independence Avenue, SW Washington, DC 20585
Re: Draft Complex Transformation SPEIS Comments Dear Mr. Wyka, As part of the Supplemental Programmatic Environmental Impact Statement
(SPEIS) process for the National Nuclear Security Administration's (NNSA) Complex Transformation, in which the Department of Energy is proposing to rebuild "the entire nuclear weapons complex with new facilities for maintaining an enduring stockpile of
1|7O nuclear weapons…," I am writing to oppose these plans and to ask that NNSA consider a "No Production" alternative instead.
The plan to build new nuclear weapons is frivolous, profoundly dangerous, illegal, and
2|5C1 immoral. It is frivolous because we all ready have sufficient nuclear weapons with a life expectancy of over 100 years and capable of destroying the earth and all life on it several times over.
It is profoundly dangerous because it increases the likelihood of use of nuclear weapons
3|3A1 and provokes a new arms race, with the U.S. threatening first strike use of nuclear weapons against any country of its choosing.
It is illegal because it violates the Nuclear Non-Proliferation Treaty, to which the U.S.
4|1F is a signatory, making it U.S. law.
It is immoral to contemplate, plan for, or create the means of mass destruction of all
5|16A life and hold the world hostage to that threat through U.S. domination.
Further, the expense of continuing to build and maintain nuclear weapons robs the human
6|9B family of sustenance and survival.
Very truly yours,
Joan Ebbitt
1240 Buckingham Ct.
Adrian, MI 49221

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(http://home.aol.com/diy/home-improvement-eric-stromer?video=15&ncid=aolhom00030000000001)

1

Ebersole, Laurence

Page 1 of 2

PC_591

Levens, Matthew

From: Larry Ebersole [wordheath@gmail.com]
Sent: Wednesday, March 19, 2008 7:29 PM
To: Complex2030
Cc: wordheath@gmail.com; marylia@earthlink.net; james.allen@mail.house.gov; nate_caminos@cantwell.senate.gov
Subject: Comment Regarding Complex Transformation: Please Include in the public testimony

Laurence H. Ebersole
4739 University Way #1356
Seattle, WA 98105 (usa)
Email: wordheath@gmail.com

To: Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1, DOE/NNSA
1000 Independence Avenue, SW. Washington, D.C. 20585

Dear Mr. Wyka; March 19,2008

I am a longtime San Francisco resident now in Seattle.
I moved to San Jose, California with my parents at age five. I remember the nuclear clouds of radiation, we school children were warned about - back then there were clouds of radioactive materials, "blowing in the wind"; clouds of radioactive contamination in the rain ("What have they done to the rain?"). There were concerns about milk, about the folly of the 'duck and cover' exercises at school. No, this is not some artifact out of Sci-Fi, or an anecdote from one of Kurt Vonnegut's novels. These radioactive saturated clouds, were due to above ground nuclear warhead test-effects.
1|1J I believe this is when I first became concerned about nuclear weapons, their effects and the need to abolish these weapons of mass destruction.

Nuclear warhead abolition is my preference, not complex transformation. Nuclear warhead abolition is the direction to pursue. This direction is affirmed in parts of international law, presumably binding on
2|16A the United States. As you may have heard, the 1996 World Court Advisory Opinion, calls on the nuclear states to strive for nuclear disarmament; so does the Nuclear Nonproliferation Treaty. I think there is a human rights perspective that is applicable, as well. I fail to understand now, how the proposed complex transformation, will aid nuclear disarmament or any humane social purpose. The plan appears
3|1F to be
a New Age sounding method to continue the design, fancier-testing, and construction of nuclear warheads.

4|14K As I am sure you have heard from the public testimony, there are public health dangers that accompany the continued modernization of nuclear warheads.
I think, too, there is a better use of the social funds proposed for the Complex Transformation.
5|8B Simply, consult with the communities of down winders in Nevada, in Livermore, and throughout the nation. I think many of the current or former down winders would prefer, federal funds be used for public health programs, green-color job development for youth (and for oldsters), support for higher education, the arts, and for diplomacy. I can name other suggestions

5/14/2008

Ebersole, Laurence
Page 2 of 2

PC_591

5|8B (cont) but I hope you get the idea. We can all choose different priorities for tax dollars. Who needs to modernise weapons of mass destruction so badly now? Not Iraq.

I ask you to help implement the testimony you receive, from the fearless and incredible Tri-Valley Cares, Physicians for Social Responsibility and Western States Legal Foundation, respectively. Please be on the side of nuclear disarmament, not continue the problem of nuclear weapons systems.

I appreciate the chance to comment on an alternative to proliferation as usual.

Sincerely,

Laurence H. Ebersole (MA)
Counselor & Advocate
(Human rights poet, Poets Against War)

cc: (Maralia Kelly, Executive Director, Tri-Valley Cares;
James Allen, District Director, Congressman McDermott;
Nate Caminos, Outreach Director, Senator Cantwell)

Eby, Lois
Page 1 of 1

PC_1438

Levens, Matthew

From: Lois Eby [leby@wildblue.net]
Sent: Friday, April 25, 2008 2:46 PM
To: Complex2030
Cc: Senator Bernie Sanders; Senator Leahy
Subject: Oppose Complex Transformation 2030

Mr. Theodore Wika,

1|1J; 2|16A I am shocked to learn of this proposal to spend $150 billion to build a plant which is to produce up to 125 new nuclear warheads per year! Our urgent national need, for our security, is to lead the way in support of international nonproliferation treaties which seek to reduce nuclear arsenals. The abolition of nuclear weapons should be our goal. How can we lead the way when we are the worst offender?!
With our present arsenal, we have no moral authority at all to oppose Iran, Syria and North Korea in their efforts to acquire nuclear weapons. "Complex Transformation" will only make matters worse.

3|9B In addition, the United States is already deeply in debt, in large part due to the fact that we spend more than all the rest of the world put together on our military. This outrageous proposal makes my heart weep for us and for our future generations.

In short, I beg you to oppose, defeat, give up "Complex Transformation 2030."

Lois Eby
Wolcott, VT 05680

1

Ecklein, Joan
Page 1 of 1

PC_2010

Levens, Matthew

From: joan .ecklein [joanecklein@comcast.net]
Sent: Wednesday, April 30, 2008 3:14 PM
To: Complex2030
Subject: comments:Draft Complex Transformation SPEIS Comments

April 29, 2008

Complex Transformation SPEIS Document Manager

Office of Transformation,NA-10.1

Department of Energy

1000 Independence AVE., SW

Washington DC 20585

Dear Theodore A.Wyka

1|13A; 2|3A The atomic era opened in 1945 when I was 10 years old. All my adult life has been spent in terror that these weapons would once again be used. They are, as you well know, a threat to all life on earth. We currently have enough atomic weapons to blow up the earth many times over. Ten thousand of our 30,000 weapons are certified annually for reliability. We have thousands of them on hair trigger alert patrolling the oceans.

3|1K; 4|9H; 5|1J I am writing this letter because I am appalled that the Bush Administration wants to appropriate $155 billion in taxpayer money to begin work on a new generation of nuclear weapons. We DON'T NEED NEW WEAPONS. We need to abolish all those weapons that we have and insist with inspection that the rest of the world do so also. Our actions only spur on other countries to try to obtain such weapons and those that have them to maintain and upgrade them.

6|1F Congress should legislate the elimination of our nuclear stockpiles in accordance with our obligation under the Nuclear Nonproliferation Treaty , not create new weapons.

7|16A I implore you to use all your influence to stop funding of the program known as "Complex 2030" and work for abolishment of all nuclear weapons.

I would appreciate a reply stating your position on the Nuclear Bombplex 2030 legislation and what you are doing to eliminate nuclear weapons

Sincerely,

Joan Ecklein

Professor of Sociology University of Mass Boston (retired)

1

Edson, Betty
Page 1 of 1

PC_1718

Levens, Matthew

From: Betty Edson [betty.edson@gmai.com]
Sent: Wednesday, April 02, 2008 5:02PM
To: Complex2030
Subject: Complex

Betty Edson
4 Edgewood St.
Randolph, VT 05060-1372

April 2, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

Dear Friends -

1|16A I am more than strongly opposed to the administraton's proposal to build a plant to produce plutonium pits for nuclear weapons. Please, please, do not allow this to happen.

2|1J I am so hoping that our country might step, at last, into a place of true moral leadership by working to rid the world of nuclear weapons, rather than adding to them.

Sincerely,

Betty Edson
802-728-4057

Edwards, Don

Page 1 of 1

PC_449

Buenaflor, Justin

From: Don Edwards [warthog1@citlink.net]
Sent: Friday, March 14, 2008 7:17 PM
To: Complex2030
Subject: Draft Complex Transformation

Please take time to consider the other side of the argument. I don't mean the protest aspect, but the National safety aspect.
1|13A1 Our nuclear weapons are vital to our National security as a deterrent first, and a weapon last.
The fact that we have a nuclear arsenal has most likely saved many American lives.
Please don't let the protestors sway your decisions. We need your work, and all you do for the security of our Country.
2|1B My family supports DOE and urges you to continue to maintain our nuclear capability. We are the greatest Country on earth, and with your help, we can continue to protect our people.

Don Edwards
Northville, NY

1

Edwards, Jean

Page 1 of 1

PC_1096

Levens, Matthew

From: Jean Edwards [edwardsfor@bellsouth.net]
Sent: Friday, April 11, 2008 10:24 PM
To: Complex2030
Cc: Jean Edwards
Subject: No to new nuclear warheads

Dear Friends: We understand your mission to move ever forward in nuclear development. However, we sadly fear that you are on the wrong track.

1|1F We think it would be unwise to convert our current nuclear warheads to more powerful ones. This would be a further violation of the Nuclear Prolification Treaty. It would also lead to more unrest in the world. Let us simmer down and try to make friends instead of enemies.

2|16A You realize of course that we would not dare to use one of these warheads. Think about what would happen. When we bombed Nagasaki, Japan, for example, half of the doctors were killed; 50,000 people died at the center of the destruction; school children died at their desks. The list goes on and on. How could we ever cause such terrible destruction and misery again? If we must never use these bombs, then why must we make them?

Please think carefully. We need to get rid of these bombs. Thank you for reading.

Jean Edwards
Office Coordinator
Fellowship of Reconciliation, Louisville Chapter
502-458-8056

1

Edwards, Michael
Page 1 of 1

PC_151

KnoxvilleChamber
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17 Market Square, #201
Knoxville, TN 37902-1405
p. 865.637.4550
f. 865.523.2071
www.knoxvillechamber.com

February 22, 2008

Mr. Ted Wyka
U.S. Department of Energy
National Nuclear Security Administration
Office of Transformation NA-10.1
1000 Independence Avenue, NW
Washington, D.C. 20585

Dear Mr. Wyka:

Thank you for the opportunity to share our comments on the National Nuclear Security Administration's Complex 2030 programmatic environmental impact statement. Like others in DOE communities around the nation, we have followed the Department's plans to reduce the size and scope of the complex, while maintaining those critical capabilities needed to keep our nation secure. We have reviewed the plans you presented at your hearing in Oak Ridge in November 2006, and read the recommendation you issued in early January 2008.

1|7N
2|15A
We support the NNSA's proposed plan to maintain a uranium center of excellence for the complex in Oak Ridge, Tennessee, known as Distributed Centers of Excellence, which is the preferred alternative. This includes the safe and secure storage of special nuclear material and the work Y-12 performs in manufacturing of secondaries and cases for the NNSA.

3|10I
Y-12 is, and we hope will continue to be for the next generation, a key component of the nuclear weapons complex. Known as the Fort Knox of enriched uranium, Y-12 has manufactured components of every weapon in the stockpile, and is currently recognized as the U.S. center of excellence in uranium. The Complex 2030 plan supports that ongoing mission.

4|3A
- We support the transformation of the nuclear weapons complex to make it smaller, more responsive, safer and more secure.

2|15A (cont)
- We support the NNSA's work to modernize the Y-12 Complex, including the completion of the special materials storage facility at Y-12, and the construction of a new uranium production facility.

5|7J
- As part of this activity, we want to work with NNSA and DOE's environmental management program to finish the clean-up needed on the site.

Thank you for the opportunity to comment on this matter.

Sincerely,

Michael Edwards
President and CEO

The Chamber is an equal service provider.

Proud to be in The Innovation Valley

Edwin, Marjorie
Page 1 of 4

Thank you, Mr. Wyka, for listening to everyone, and for thinking my hand as I left near the end of the hearing.
M.S.E.

PC_310

MARJORIE SWANN EDWIN
612 Washington Street, Apt. A
Santa Cruz, California 95060
831-466-9809
mswannedwin@earthlink.net

April 2, 2008

Mr. Ted Wyka
National Nuclear Security Agency
Office of Transformation NA-10.1
1000 Independence Avenue, S.W.
Washington DC 20585

Dear Mr. Wyka:

On March 19 of this year, I attended the afternoon public hearing in Livermore in response to the invitation for comments on your agency's Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement. Since the three minutes allotted to each commentator was not sufficient for most of us to complete our comments, I am adding to my comments by means of this written communication.

First, I should say that I am not a scientist, an engineer, a physicist, a weapons expert, or an employee of any weapons-producing agency or company. So there might be a tendency on the part of yourself and your colleagues to discount – write off – any comments that I or many others at these hearings might make.

However, I am a concerned citizen of the United States, a mother, and a grandmother. I am a person who has spent 73 years of my life studying, practicing, writing and speaking about – even going to jail and prison for – alternative methods of resolving human problems – be they on a basic family or neighborhood, or more importantly, on a national and international level. As I said during my three minutes, there ARE viable alternatives to war, mass killing, destruction, and other forms of violence which plague humankind, and these alternatives have been shown to be effective in actual human conflicts, including war. It is not imperative that we depend on ever more deadly weapons to maintain order, peace, and security in the world.

1|16A

The above statements, obviously, are not direct comments on the Complex Transformation Environmental Impact Statement which was distributed to us, and on which we were asked to comment. However, it is not appropriate to comment only on the Impact Statement and the plans behind it, without also considering the context of our country's production and maintenance of a nuclear arsenal and delivery systems. The context is all-important for the survival and security of not only U.S. citizens, but for all other

Edwin, Marjorie
Page 2 of 4

human beings on earth, for all other life forms, and for the environment. That's why I jokingly asked you to change the name of the agency – because, as I said, the words "nuclear" and "security" are incompatible – that is not a joke, but an obvious fact.

I graduated from Morgan Park High School on the south side of Chicago at age 16 in June of 1937. The salutatorian of our senior class was Tom Brill, a brilliant student who had majored in science and mathematics, whereas I majored in modern languages and history. I received a scholarship to attend Northwestern University; Tom went to the University of Chicago. A few years ago, there was an article in The New York Times about the anniversary of the first experimental nuclear explosion, led by Enrico Fermi, underneath the football stands at the University of Chicago. Accompanying the article was a photograph of the scientists who had been working on the experiment, accompanied by a chart listing the names of those in the photo. Sure enough, there was my old friend and classmate, Tom Brill. The salutatorian of our class had gone on to work on the development of the world's first atom bomb, while I, the valedictorian, had gone on to work actively in the nonviolence movements in this country – a symbolic contrast. (Not that I ever advocated "giving in" to the Nazis, or to any other forms of human degradation; on the contrary, I believe all forms of violence and slaughter of human beings must be vigorously opposed, even at the possible cost of one's life. And not that I dis-respect those who opt for war. I have worked with and counseled men and women on active duty, veterans, potential draftees, along with conscientious objectors, ever since World War II.)

Having provided that background, I want to go on to the question at hand – the continuing and "improved" production of nuclear weapons at the Livermore Labs and other facilities around the country. It sees to me that we in the United States – both those advocating for and those advocating against nuclear weapons – have to take into account the fact that our country is the ONLY nation ever to have used nuclear weapons, so far as I know. Not only at Hiroshima and Nagasaki, but as I said at the hearing, also in the form of depleted uranium weapons – in Serbia, Kosovo, in the First Gulf War in Kuwait and Iraq, and now heavily in Iraq. 2|7O

I have visited Hiroshima and Nagasaki, in 1964, almost 20 years after World War Ii was ended by the use of atom bombs on those two cities. The continuation of suffering was very evident – in the hospitals in both cities, in the fear of more and more nuclear weapons being produced by several countries, in the effects of the first atom bombs even on second, third, and fourth generation-descendants of people who had been the victims. Later that year, I coordinated the first visit to the U.S. of a large group of survivors. The World Peace Study Mission, as it was called, was comprised of 25 survivors from both cities, plus 15 interpreters from International Christian University in Tokyo.

The group was divided into three teams, and went across this country by different routes, stopping in large and small cities, and even some small towns. Each team was

Edwin, Marjorie
Page 3 of 4

accompanied by an Airstream trailer holding exhibits about the bombings and about the lives of survivors. The survivors did not talk mainly with people in the peace movement. Rather, they met and talked with their counterparts – the nuclear physicist with other scientists at labs and meetings; the teachers with classes in schools and teachers' gatherings; the farmers with farm groups and families; the social workers with agency staffs; the newsmen with journalists at newspapers and press conferences; etc. One team was hosted at a banquet by an American Legion Post in Kansas City, and veterans and "hibakusha" (survivors) took turns telling about their experiences in the war, each ending his or her report with the words "Never again!" One team met with President Truman at his home in Missouri; he did not apologize for ordering the bombs dropped, but said, "Our two countries should never have been at war; Japan and the United States had always been friends."

But the most striking part of that visit was the messages which team members kept getting, almost every day by telegram or phone call, about family members or close friends who had just died, or had gone yet again to the hospital. Almost twenty years, later, victims (and their children) were still suffering and dying. Such results were not confined to the Japanese victims. There were G.I.s in a P.O.W. camp in Hiroshima at the time the bomb was dropped; they too, if they survived, suffered many effects, as did men who had been on ships in the Pacific after the war when test bombs were exploded, and often people who worked in the plants making the bombs and components (Rocky Flats is a good example). It took the efforts of a World War II farmer from Iowa and his wife many, many years before they and their fellow members of the Atomic Veterans of America received recognition by the government that they too were victims and needed medical care. Actually, the farmer himself died before medical care for such veterans was put into place by the Veterans Administration, as probably did others whose names we do not know.

The use of depleted uranium weapons has the same history. Thousands of Iraqi children died during the period between the First Gulf War and the beginning of the present war from the lasting effect of these weapons. And thousands more are being affected by these weapons now. It is not just the immediate explosions; it is the air-borne articles and dust which spread over very wide areas. Scientists traced the fall-out from Three Mile Island and Chernobyl over hundreds of miles of Europe and the U .S., and correlated those wind patterns and fall-out with increased incidences of various types of cancer. Nuclear weapons are not like bullets, or even non-nuclear bombs, which affect relatively few people directly under fire; instead, they devastate broad areas for thousands of miles with long-lasting effects.

I am certain that you and others working on and with nuclear weapons know all this. Apparently you believe that the results are worth the cost. But it is my belief that the more intangible results -- the threat to world peace, the imitation by other countries (which the nuclear "haves" try to prevent by intimidation of the nuclear "have-nots" or "would-be haves"), the long-range effects on human and environmental health, the lack 3|14O

Edwin, Marjorie
Page 4 of 4

3|14O (cont.) of serious consideration of other means for dealing with international conflict – these are also the "fall-out" of continued research and development of ever more deadly nuclear weapons . They HAVE TO BE TAKEN INTO ACCOUNT in any consideration of further development and threatened use of nuclear weapons, and so should be an integral part of your evaluations of "environmental impact."

4|1F 5|1L In addition, of course, this country, along with others, agreed some years to a nuclear non-proliferation treaty. Most of us understood that to mean that the numbers of nuclear weapons and delivery systems would be reduced drastically, that no new developments would be undertaken, that the terrible threat of the "Cold War" with potential "mutual destruction" was over. However, as we have insisted on weapons being destroyed in the various components of the USSR and Russia itself, it seems that this country has not been keeping pace. Instead, we seem to be planning for new-generation weapons and improved delivery systems in our own country, and we are not "minding the store" on such dangerous allies as Pakistan, India, and Israel and their nuclear weapons. We openly threaten other nations which we suspect of developing their own arsenal, and the present administration started a whole major war on the premise that Iraq had "weapons of mass destruction" – which, as it turned out, it did not.

6|9B The present course of this country, in other words, seems to be pointed, intentionally or not, at future use of nuclear weapons, and perhaps chemical and biological weapons also, if an administration deems it "necessary" for whatever reason. This is total folly! It certainly is not the way to world peace. We need all the resources we are now spending on war and war preparation for many more useful things in this country and other countries: re-building of infra-structure; universal health care; decent housing; improved education; and above all, saving the environment by every means possible.

7|16L So I want to appeal to those of you working at these nuclear weapons establishments all over the country. Where are your consciences? Where is your common sense? Your moral values? I have already mentioned what could be done with all the money we now spend on weapons of all kinds. But can you think of how useful your intelligence and yours skills could be to solve some of the many problems and difficulties which beset this country and the world? Right now! – when we are in a desperate situation with regard to the environment, we need all hands on deck to make up for the years and centuries of neglect and mis-use. We have to figure our what to do – safely – with all the JUNK in the world – in our oceans, on the land, in the air. We have to determine how to stop polluting our water, our food, our air, our soil, our universe. We need to discover how to live in harmony, with our environment, and with each other.

6|9B (cont.)

6|9B (cont.) Are those not sufficient challenges that we can stop figuring out how to destroy each other and our world? I urge you to turn your agency into the International World and Environmental Safety Administration, and to put as much money, as much energy, as many brains into new directions as you have previously been putting into illusory "defense." Thank you, and sincerely,

Marjorie Swann Edwin

Egan, Jean
Page 1 of 1

2030 PC_314 Ballo

UNOFFICIAL BALLOT
NATIONAL REFERENDUM ON
THE FUTURE OF NUCLEAR WEAPONS

INSTRUCTIONS TO VOTERS: USE BLACK OR BLUE PEN ONLY. To vote on Measures A and B, fill in the oval after the word "Yes" or "No." You may add your own comments below.

MEASURES SUBMITTED TO THE VOTERS
NATIONAL

1|9A **A** Shall the United States proceed with a $150 billion plan to modernize its nuclear weapons research, development and manufacturing complex in order to replace its existing nuclear weapons and establish the capacity to build new types of nuclear weapons by the year 2030 ("Complex 2030")? YES ( ) NO (X)

2|1F **B** Shall the United States, in compliance with its obligation under the Nuclear Non-Proliferation Treaty, commit to the global elimination of nuclear weapons no later than 2030 by initiating negotiations leading to conclusion of a verifiable treaty, under strict and effective international control? YES (X) NO ( )

3|16A COMMENTS: Let us get out of the weapons business!

NAME Jean Egan
ADDRESS 3712 Tamul St
Austin Tx 78799
SIGNATURE Jean Egan DATE 3/16/08

Egan, Jim
Page 1 of 10

Exhibit Restored from Jim Egan, Painter
PC-97
Agronom
Hearing
2/28/08

Quote found in THE AENEID, by Virgil…in Latin, of course, originally:

1|20

> Gods of our fathers, Heroes of our Land….
> Do not prevent at least this youthful prince
> From saving a world in ruins…
> For right and wrong change places; everywhere
> So many wars, so many shapes of crime
> Confront us: no due honor attends the plow.
> The fields, bereft of tillers, are all unkempt….
> …throughout the world
> Impious War is raging.

(I.ls. 498-511)

A world in ruins, indeed!

Egan, Jim
Page 2 of 10

25

"War . . . Never Again!"

Thomas J. Gumbleton

. . . a solemn pledge which must change the future history of the world: No more war, war never again.
—Pope Paul VI, Address to the United Nations General Assembly, October 4, 1965

At 11:40 P.M. on December 31, 1999, I was in the forefront of a long procession of over four hundred people. We were walking through the Nevada desert toward the underground site used by the United States Department of Energy to do the testing necessary to maintain our nuclear arsenal in a state of constant readiness and to develop even more sophisticated and more destructive nuclear weapons. It was inspiring and hopeful to look back and see a very long line of people bearing lighted candles in an attempt, literally and figuratively, to dispel the darkness of this remote desert area. The darkness of the night was far more easily dispelled than the darkness hovering over our planet because of the nuclear arsenal that had its beginnings here.

At 12:01 A.M., January 1, 2000, I was the first of the hundreds arrested for crossing the line into the darkness of the test site. We were confronted by U.S. military troops and officers of the county sheriff department. After being warned not to cross the line, we knelt down to pray, arose, and walked on. The arrests followed immediately. For me this was the most appropriate place to be as the year, the century, and the millennium came to an end. The most important spiritual question of our time revolves around the development and use (as well as the intended future use) of nuclear weapons.

Albert Einstein, the scientist whose contribution to theoretical physics led to the development of the atomic bomb, came to understand the moral depravity of nuclear weapons and the unspeakable risk they presented to the very existence of the Earth. After the successful government testing of the weapons he declared, "With the development of nuclear weapons, everything has changed except our

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thinking." I felt that it was very important to be at the Nevada test site at the beginning of the new millennium to denounce the way of thinking that justified the development and the use of these weapons of mass destruction during the past century and to proclaim a commitment to enter the new century with the strongest possible determination to change our way of thinking, leading to the total abolition of these weapons.

This is a matter of the greatest urgency. By threatening the total destruction of the world and all its people we are, in fact, destroying ourselves spiritually. In *The Challenge of Peace*, the pastoral letter of the U.S. Catholic bishops written in 1983, we stated, "The nuclear age is an era of moral as well as physical danger. We are the first generation since Genesis with the power to threaten the created order." It is almost impossible to grasp the full dimension of the evil that is contained in the intent to use nuclear weapons. Such an act is the most complete repudiation of God that we as human creatures could ever do. God is love. St. John says so plainly, and Jesus revealed so clearly when he "pitched his tent among us." God's love is manifest to us through God's creative power. All of the universe, our world, and each human person is loved into existence by God.

But nuclear weapons are a direct challenge to God's creative love. An Indian writer, Arundahti Roy, put it this way: "The nuclear bomb is the most antidemocratic, antihuman, outright evil thing that man has ever made. If you are religious, then remember that this bomb is man's challenge to God. It's worded quite simply: 'We have the power to destroy everything that You have created.'"[1] And to emphasize the physical danger hanging over us, she goes on to say, "If you're not [religious], then look at it this way. This world of ours is four thousand six hundred million years old. It could end in an afternoon."[2]

If you feel that the nuclear threat is over because the Cold War is over, you should know that such an afternoon was within ten minutes of happening on January 25, 1995. Russian military radar detected the launch of a U.S. scientific rocket from a base in Norway, and mistakenly concluded that it might be the beginning of a surprise attack. President Yeltsin was notified and given less than ten minutes to choose from a range of responses that included launching four thousand nuclear warheads against the U.S. What happened in Moscow that morning is not exactly clear, but fortunately the Russians did not launch a nuclear attack. The next time we may not be so lucky.[3]

With thirty-five thousand nuclear warheads in the world, and more than five thousand of these warheads in the U.S. and Russian arsenals

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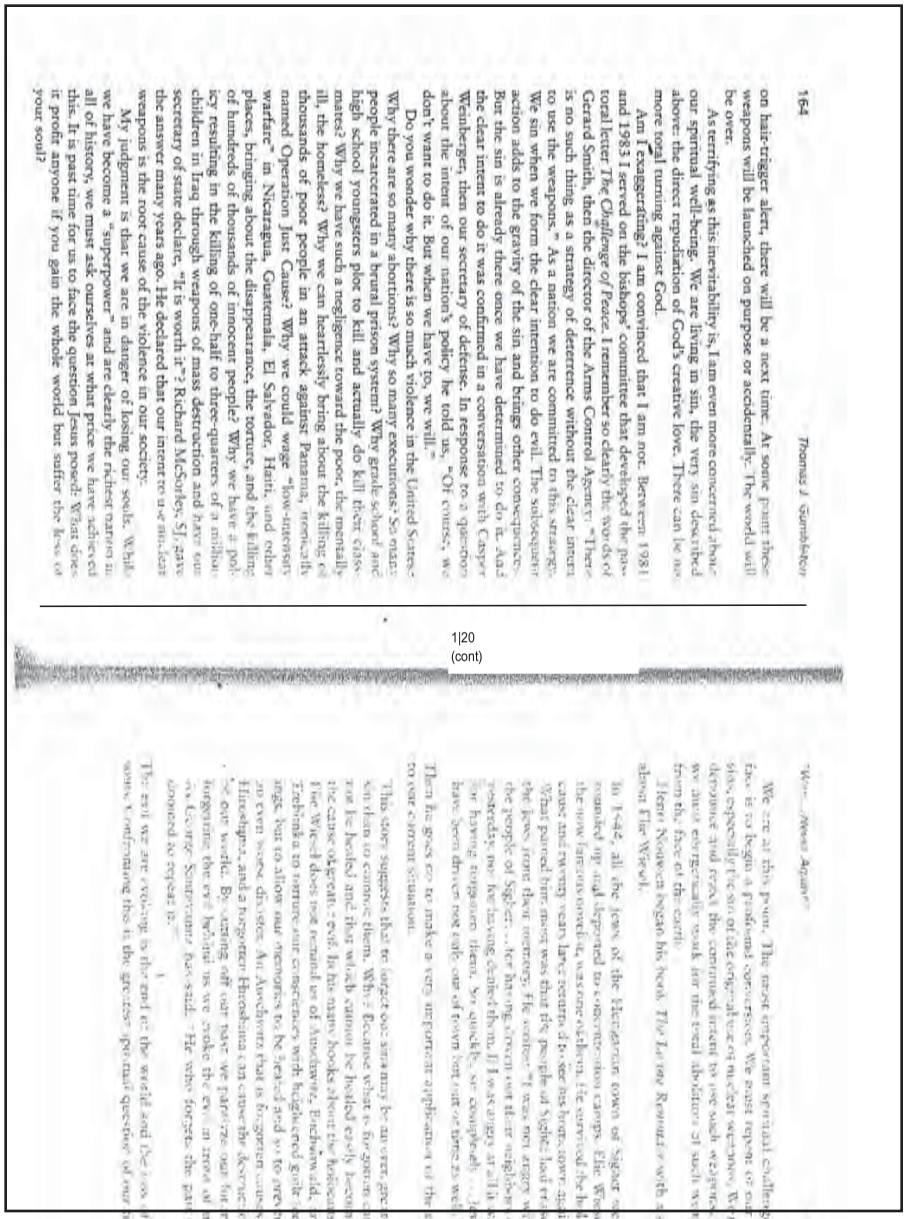

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on hair-trigger alert, there will be a next time. At some point these weapons will be launched on purpose or accidentally. The world will be over.

As terrifying as this inevitability is, I am even more concerned about our spiritual well-being. We are living in sin, the very sin described above: the direct repudiation of God's creative love. There can be no more total turning against God.

Am I exaggerating? I am convinced that I am not. Between 1981 and 1983 I served on the bishops' committee that developed the pastoral letter *The Challenge of Peace*. I remember so clearly the words of Gerard Smith, then the director of the Arms Control Agency: "There is no such thing as a strategy of deterrence without the clear intention to use the weapons." As a nation we are committed to this strategy. We sin when we form the clear intention to do evil. The subsequent action adds to the gravity of the sin and brings other consequences. But the sin is already there once we have determined to do it. And the clear intent to do it was confirmed in a conversation with Caspar Weinberger, then our secretary of defense. In response to a question about the intent of our nation's policy he told us, "Of course, we don't want to do it. But when we have to, we will."

Do you wonder why there is so much violence in the United States? Why there are so many abortions? Why so many executions? So many people incarcerated in a brutal prison system? Why grade school and high school youngsters plot to kill and actually do kill their classmates? Why we have such a negligence toward the poor, the mentally ill, the homeless? Why we can heartlessly bring about the killing of thousands of poor people in an attack against Panama, mentally named Operation Just Cause? Why we could wage "low-intensity warfare" in Nicaragua, Guatemala, El Salvador, Haiti, and other places, bringing about the disappearance, the torture, and the killing of hundreds of thousands of innocent people? Why we have a policy resulting in the killing of one-half to three-quarters of a million children in Iraq through weapons of mass destruction and have our secretary of state declare, "It is worth it"? Richard McSorley, SJ, gave the answer many years ago. He declared that our intent to use nuclear weapons is the root cause of the violence in our society.

My judgment is that we are in danger of losing our souls. While we have become a "superpower" and are clearly the richest nation in all of history, we must ask ourselves at what price we have achieved this. It is past time for us to face the question Jesus posed: What does it profit anyone if you gain the whole world but suffer the loss of your soul?

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Voices Against Violence 165

We are at this point. The most important spiritual challenge we face is to begin a fundamental conversion. We must repent of our past sinfulness, especially the sin of the original intent to use such weapons. We must repent and reject the continued intent to use such weapons. And we must courageously work for the total abolition of such weapons from the face of the earth.

Henry Nouwen began his book *The Road to Daybreak* with a story about Flat Weasel.

In 1942, all the Jews of the Netherlands were ordered to register. Nouwen explains that Dutch citizens responded with a strong sense of cooperation. Flat Weasel, the new citizen-friendly weasel-like version of the Dutch, was created. What seemed most was that the people of Nijmegen had refused the Jews from their territory. He continued, "I was not angry with the people of Nijmegen. . . . Her having chosen not to cooperate with the Nazis, her choosing to help the Jews, her choosing to risk her own life and the lives of her children, her having suffered deportation herself, all these have been driven not only out of town but out of there as well."

Then he goes on to make a very important application to the events of our current situation:

This story suggests that we forget our attempts to answer greatest sin than to commit them. What I became what is forgotten can not be healed and that which cannot be healed easily becomes the cause of greater evil. In his many books about the holocaust, Elie Wiesel does not remind us of Auschwitz, Buchenwald, and Treblinka to nurture our resentments with heightened guilt feelings, but to allow our memories to be healed and to prevent us even worse disasters. An Auschwitz that is forgotten could be a Hiroshima, and a forgotten Hiroshima can become the doorway to our worlds. By staying with our past we can free it from its destructive power and transform the evil behind us into a source of new life. Forgiveness does not make the evil done to us disappear, but it does open up a new future.

The evil we are evidencing in the world and the loss of our souls is unfortunately this is the greatest spiritual question of our time.

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A No Production Alternative

Purpose and Need

The National Environmental Policy Act requires federal officials to include all reasonable alternatives in the preparation of Environmental Impact Statements. In order to determine what alternatives are reasonable, federal officials must consider agency preferences and must conduct a public scoping process.

The result of the scoping process for the Complex 2030 SPEIS was unequivocal. The number of people who participated was unusually large—more than 33,000 comments were submitted into the record—and more than 90% of the comments urged consideration of a path away from weapons production and toward disarmament in keeping with US obligations under the Nonproliferation Treaty.

The Draft SPEIS does not present such an alternative. This deficiency should be rectified in the final SPEIS, which should include a fifth alternative (after No Action and the three others in the current draft): The Weapons Complex that produces No Bombs.

Before exploring this alternative, we should answer two questions: Is such an alternative reasonable? Could such an alternative meet the president's directive to secure our nation with the least possible number of bombs?

The first question can be answered in the affirmative. In fact, if we take seriously the commitments of the United States in the Nuclear Nonproliferation Treaty and the stated nonproliferation goals of the United States, a nuclear weapons complex that produces no bombs is not only reasonable, it is inevitable. This turns our question to timing, and we ask: is it reasonable to consider a weapons complex that produces no bombs *now*?

The second question points toward security considerations. Is it possible to meet the demands of the president's directive "to secure our nation with the least possible number of bombs" with a weapons complex that produces no bombs?

In answering these questions we return to the published opinions of key strategists and long-time policy insiders, Henry Kissinger, George Shultz, Sam Nunn, William Perry, Thomas Graham and others. One of the distinguishing features of their call for a practical approach to nuclear disarmament is a sense of urgency – not only is it reasonable to contemplate moving in this direction now, it is imperative.

Kissinger and the others have come to this conclusion precisely because they see that our security requires it. In other words, their answer to our second question—Is it possible to meet the president's directive?—also goes beyond the standard of "reasonable" to imperative. Few would argue that the list of people who developed the nine practical steps outlined in the *Wall Street Journal* are willing to sacrifice US security needs in pursuit of nuclear disarmament. The least possible number of bombs that will secure our nation, in the future that these men and women believe can not come too soon, is zero. It is also the maximum number.

In a world where the NPT is realized, what is left of the weapons production complexes of the Nuclear Weapons States will be an infrastructure and workforce dedicated to the disassembly, dismantlement, and disposal of weapons materials and components. This work will be conducted under international verification protocols in facilities that are transparent by design and safeguarded as far as possible from hostile attacks and disruption by natural phenomena.

The time to begin developing this vision is now, and the place to begin putting flesh on this vision is the current SPEIS on Complex Transformation.

What will a weapons complex that produces no bombs look like? Where will its facilities be located? What capabilities would be included? What workforce will be required and what skill sets must they have?

The National Environmental Policy Act does not require the NNSA to make a weapons complex that produces no bombs a preferred alternative, but it does require such an alternative to be fully analyzed as a "reasonable" alternative—unless the vast majority of the public and leaders such as Henry Kissinger, Sam Nunn, et al are unreasonable.

No Production Weapons Complex. Under the programmatic No Production Alternative, NNSA would continue to operate only those facilities required to achieve the safe, secure, efficient disassembly and dismantlement of nuclear weapons and the disposition/disposal of their constituent parts. Some facilities at

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2|70 (cont) each of the seven sites will be retired and infrastructure and funding will be required to assure their safe, secure and complete decontamination, decommissioning and destruction. Some sites may be closed entirely, others may require new construction to achieve efficiencies and improve safety.

Weapons Design and Certification. In a fully-compliant NPT world, the need for weapons design activities will disappear. Requirements will shift; some weapons design capacities will need to be maintained to address possible questions which arise during decommissioning, disassembly, dismantlement and disposition of the stockpile. Capabilities of the weapons labs may also be used in determining alternative uses for some materials or constituents currently used in nuclear weapons and addressing issues that may arise should such transformation activities be deemed advisable.

3|1F Maintaining three fully equipped national laboratories would not be necessary; consolidation of required laboratory-based activities in support of a No Production Alternative would result in considerable savings – economic as well as environmental, savings which could be dedicated to addressing environmental concerns at the sites which close.

Decisions about which of the three weapons labs should continue to operate in support of the No Production Alternative should be made on the basis of an analysis of the technologies available at each lab rather than considerations of politics.

2|70 (cont) **Plutonium Operations and Pit Manufacture.** Plutonium operations requirements in a No Production Alternative would be reduced to questions of safe extraction, processing and disposal of plutonium currently in pits, in storage, or in other NNSA inventories. The location of such operations would be determined by an analysis of current technical and infrastructure capacities. Any facilities (new or upgraded) which conduct plutonium operations should incorporate transparency in their physical infrastructure as well as the processes in order to facilitate international verification of plutonium handling.

Activities required for plutonium currently in warheads would include: disassembly of warheads and pit removal; staging of pits awaiting further dismantlement; dismantlement of pits; safe and secure storage of pit materials until disposition activities are completed.

The plutonium itself should be placed under international monitoring and administrative control at the earliest possible moment.

The need for pit manufacture in an NPT-compliant, No Production world will be eliminated. Facilities currently available for pit production at Los Alamos would be given consideration for any role required in the disposition of plutonium from retired warheads or in other NNSA inventories.

All other plutonium facilities would be decommissioned and scheduled for demolition.

Uranium operations and Secondary and Case Fabrication. Uranium operations in support of disassembly, dismantlement and disposition regimes would be located at the Y12 Plant in Oak Ridge, Tennessee, where considerable infrastructure, including a Uranium storage facility under construction, currently exists. Y12 is the only currently operating site with the technical capacity to undertake large scale uranium operations.

Current facilities at Y12 would be analyzed for suitability for uranium processing; the question of upgrading aging facilities vs. construction of a new uranium processing facility will be made only after a thorough cost/benefit analysis. In either case – retrofitting an older facility or constructing a new facility – all facilities will have transparency "designed-in" in order to facilitate international inspection of all stages of the uranium operations and eventually, international possession of all HEU.

Given the nature of thermonuclear secondaries, it would be expected that similar operations with other constituents – lithium, beryllium, etc – would be co-located with uranium operations, though evaluation of other options which might provide efficiencies or improvements in safety or security could be considered.

Weapons Assembly/Disassembly and High Explosives Production. The need for High Explosives Production for nuclear weapons would no longer exist under the No Production Alternative. If questions exist about stability of behavior of high explosives during disassembly/dismantlement operations or in current stockpiles of HEX, some bench-scale facilities might be maintained until such time as questions are satisfactorily resolved.

Weapons assembly operations would cease, and resources dedicated to assembly operations would transition to disassembly. Facilities for staging retired warheads awaiting disassembly, the actual physical disassembly, and staging constituent parts awaiting transportation or disposal would be co-located. While

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the Pantex facility seems an obvious choice to locate such facilities, consideration could be given to other sites which present efficiencies in operations or significantly reduce safety risks due to transportation. It does not seem likely that more than one facility would be required.

2|70 (cont) **Category I/II SNM Storage.** Co-location of storage facilities for some or all Category I/II materials under international administrative control will be analyzed in the SPEIS for a No Production Complex. Issues of safety and security which accompany transportation of Category I/II SNM will be evaluated against gains in efficiencies, safety, and long-term security before decisions are made.

This evaluation should incorporate site-specific evaluations at facilities currently handling Category I/II SNM and then be made on a programmatic basis.

Tritium Production and R&D. Tritium production will no longer be necessary in a fully NPT compliant weapons complex. Tritium production activities at the Watts Bar Nuclear Plant in Tennessee will cease and TPBars will be decontaminated, decommissioned, and destroyed.

Tritium operations at Savannah River will be scaled back – tritium extraction will cease.

Tritium should be treated to render it unusable in weapons and any residual tritium-containing materials should be placed in safe, secure storage under international administrative control and monitored throughout its decay cycle.

High Explosives R&D. High Explosives R&D will cease. See High Explosives Production above.

Flight Test Operations. Flight Test Operations for nuclear weapons delivery systems will cease. Decontamination, decommissioning and environmental restoration of all facilities will take place.

Hydrodynamic Test Facilities. High explosive experiments to study weapons physics and assess the performance of nuclear weapons will no longer be necessary. If other, non-military uses can not be found for equipment and facilities, they will be decommissioned and demolished.

Major Environmental Test Facilities. Environmental facilities used to test nuclear weapons will no longer be necessary and will transition to non-weapons work or will be decommissioned and demolished.

Non-nuclear production. Under the No Production Alternative, the Kansas City Plant will be included in the SPEIS. Any facilities at the Kansas City Plant necessary to support safe and efficient disassembly, dismantlement and disposition of the stockpile will be maintained; the result will be a dramatically reduced footprint for the Kansas City operations. Current plans for moving the Kansas City Plant will be abandoned; funding currently allocated for relocation of the Kansas City Plant can be dedicated to addressing environmental concerns at the current operating facility.

Benefits of the No Production Alternative

The No Production Alternative minimizes environmental impacts and joined with effective political leadership, can be the most effective in reversing or at least remediating the effects of past negative environmental impacts.

The No Production Alternative can enhance the economic status of the communities in which facilities are located, directing the energy and efforts of the workforce toward dismantlement of warheads and of the apparatus and infrastructure of design, production and testing. With competent political leadership and an involved public, positive benefits will be realized and negative impacts will be minimized or eliminated.

The No Production Alternative is the only alternative that corresponds fully with the United States' obligations under the nuclear Nonproliferation Treaty and the finding of the World Court in 1996.

The No Production Alternative provides the leadership called for by arms control, diplomatic and military leaders.

The No Production Alternative enhances security for the United States by braking immediately the global momentum toward nuclear proliferation and increasing security for every country.

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8th day center is a Catholic think tank based in Chicago area.

-----Original Message-----
From: Eighthday [mailto:bulletins@claret.org]
Sent: Friday, May 23, 2003 4:43 PM
To: bulletins-8thday@lists.claret.org
Subject: [bulletins-8thday] Facism -- 14 Characteristics

1|20 (cont)

FASCISM - 14 CHARACTERISTICS
Dr. Lawrence Britt - 5/2/03

Dr. Britt, a political scientist, published his article "Fascism Anyone?" in Free Inquiry magazine (Spring, 2003), a journal of humanist thought. He studied the fascist regimes of Hitler (Germany), Mussolini (Italy), Franco (Spain), Suharto (Indonesia), and Pinochet (Chile). Dr. Britt found the regimes all had 14 things in common, and he calls these the identifying characteristics of fascism.

1. Powerful and Continuing Nationalism - Fascist regimes tend to make constant use of patriotic mottos, slogans, symbols, songs, and other paraphernalia. Flags are seen everywhere, as are flag symbols on clothing and in public displays.

2. Disdain for the Recognition of Human Rights - Because of fear of enemies and the need for security, the people in fascist regimes are persuaded that human rights can be ignored in certain cases because of "need." The people tend to look the other way or even approve of torture, summary executions, assassinations, long incarcerations of prisoners, etc.

3. Identification of Enemies/Scapegoats as a Unifying Cause - The people are rallied into a unifying patriotic frenzy over the need to eliminate a perceived common threat or foe: racial, ethnic or religious minorities; liberals; communists; socialists, terrorists, etc.

4. Supremacy of the Military - Even when there are widespread domestic problems, the military is given a disproportionate amount of government funding, and the domestic agenda is neglected. Soldiers and military service are glamorized.

5. Rampant Sexism - The governments of fascist nations tend to be almost exclusively male-dominated. Under fascist regimes, traditional gender roles are made more rigid. Opposition to abortion is high, as is homophobia and anti-gay legislation and national policy.

6. Controlled Mass Media - Sometimes the media are directly controlled by the government, but in other cases, the media are indirectly controlled by government regulation, or sympathetic media spokespeople and executives. Censorship, especially in war time, is very common.

7. Obsession with National Security - Fear is used as a motivational tool by the government over the masses.

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8. Religion and Government are Intertwined - Governments in fascist nations tend to use the most common religion in the nation as a tool to manipulate public opinion. Religious rhetoric and terminology is common from government leaders, even when the major tenets of the religion are diametrically opposed to the government's policies or actions.

9. Corporate Power is Protected - The industrial and business aristocracy of a fascist nation often are the ones who put the government leaders into power, creating a mutually beneficial business/government relationship and power elite.

10. Labor Power is Suppressed - Because the organizing power of labor is the only real threat to a fascist government, labor unions are either eliminated entirely, or are severely suppressed.

11. Disdain for Intellectuals and the Arts - Fascist nations tend to promote and tolerate open hostility to higher education, and academia. It is not uncommon for professors and other academics to be censored or even arrested. Free expression in the arts is openly attacked, and governments often refuse to fund the arts.

12. Obsession with Crime and Punishment - Under fascist regimes, the police are given almost limitless power to enforce laws. The people are often willing to overlook police abuses and even forego civil liberties in the name of patriotism. There is often a national police force with virtually unlimited power in fascist nations.

13. Rampant Cronyism and Corruption - Fascist regimes almost always are governed by groups of friends and associates who appoint each other to government positions and use governmental power and authority to protect their friends from accountability. It is not uncommon in fascist regimes for national resources and even treasures to be appropriated or even outright stolen by government leaders.

14. Fraudulent Elections - Sometimes elections in fascist nations are a complete sham. Other times elections are manipulated by smear campaigns against or even assassination of opposition candidates, use of legislation to control voting numbers or political district boundaries, and manipulation of the media. Fascist nations also typically use their judiciaries to manipulate or control elections.

ACTIONS
1) Consider this article as you ponder the news events each day.
2) Share and discuss this article with friends, family, coworkers and your faith community.

Please spread this Bulletin widely: forward it or post it on conferences and e-mail lists.

Write to us relative only to Bulletins concerns (comments, suggestions, to subscribe or unsubscribe) at bulletins@claret.org .

Please direct all other correspondence to

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PRESBYTERIAN CHURCH (USA)

The 215th General Assembly (2003) calls on all nations to fulfill their commitments under the Nonproliferation Treaty and move to the abolition of nuclear weapons. As steps toward this goal, we call on the United States to do the following: • Renounce the first use of nuclear weapons. • Permanently end the development, testing, and production of nuclear warheads.

JEWISH PEACE FELLOWSHIP

The nature of war has changed dramatically in this century with the advent of weapons of mass destruction, making war itself the ultimate enemy of all humankind. We oppose the testing, deployment, and indeed the existence of nuclear weapons. We see in the current proliferation of nuclear weapons a very real threat to the continued existence of the human race. We base our opposition on Judaism's moral and religious tradition which obliges us to be concerned with all humanity and with the preservation of a sustainable planet, as well as on universal, humanitarian grounds.

THE EPISCOPAL CHURCH

Resolved, That the 72nd General Convention of the Episcopal Church support the goal of total nuclear disarmament, inasmuch as the production, testing and deployment of nuclear weapons continue, more must be done to achieve that nuclear disarmament, and be it further

Resolved, That this General Convention urge the Government of the United States to exercise leadership among the nations, especially the nuclear weapons states, by immediately initiating negotiations for an international Treaty on Comprehensive Nuclear Disarmament in all its aspects to include a deadline for the completion of nuclear disarmament, and be it further

Resolved, That this General Convention support the World Campaign to Abolish Nuclear Weapons and encourage Episcopalians to sign the Campaign's Citizens Pledge on Nuclear Weapons Abolition.

General Convention, 1997

UNITARIAN UNIVERSALIST CHURCH

BELIEVING that humankind is free to choose life, we denounce the blasphemy against life which is represented by the development, production, deployment and threatened use of nuclear weapons.

PLEDGING, in our religious principles, to protect the "... Earth and interdependence of its living system", we choose to create hope and the vision of a better world. We fulfill this pledge through our efforts to abolish all nuclear weapons from the face of the earth.

October 1983 General Resolution

THE LUTHERAN CHURCH (ELCA)

We call on the United States and Russia to fulfill their commitments under the Non-proliferation Treaty and move together with the other nuclear powers—step by carefully inspected and verified step—toward the abolition of all nuclear weapons. Working to achieve this goal, we call on the United States to permanently end the development, testing, and production of nuclear warheads. Work towards a peaceful reconciliation of the ongoing nuclear crisis on the Korean peninsula through multilateral negotiations.

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4|1J

DEFENDING GOD'S CREATION

Nuclear Proliferation shifts into high gear as the United states announces its plan to build Complex 2030—a complex of new facilities to design, build and produce nuclear weapons. The Y12 Plant in Oak Ridge, TN will be a key production facility, building nuclear bombs for the next century.

How will people of faith respond?

A Resource for the Faith Community's Response to the Global Nuclear Crisis

THE OAK RIDGE ENVIRONMENTAL PEACE ALLIANCE
October 2006

If you aren't addressing the great issues of the day, you aren't really living.
– William Sloane Coffin

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On October 19, 2006, the National Nuclear Security Administration announced plans for Complex 2030—a new nuclear weapons complex of labs, production and testing facilities.

The purpose of Complex 2030, according to NNSA, is to build a new thermonuclear warhead—the Reliable Replacement Warhead—that will be the cornerstone of the US nuclear arsenal for the next century. "These warheads will have the same military characteristics, be carried on the same types of delivery systems, and hold at risk the same targets as the warheads they replace, but they will be re-designed for long-term confidence..."

5|2C

The NNSA is seeking public comment on its plans—in writings and at hearings at select locations. The public hearing in Oak Ridge is Monday, November 13.

WHAT CAN YOU DO?

Tell someone else about this.

Go to a hearing, write comments and send them in. Join with other people of faith to speak with your Senators and Representative. Be loud and clear and honest and brave. Tell them we want true security, rooted in taking care of people in this country.

Support OREPA as we educate and organize.

Written comments and requests to be placed on the document distribution list can be sent to the Complex 2030 SEIS Document Manager by

e-mailing: Complex2030@nnsa.doe.gov

writing: Theodore A. Wyka — NO mail!!
Complex 2030 SEIS Document Manager
U.S. Department of Energy, NA–10.1
1000 Independence Avenue, SW.
Washington, DC 20585.

Additional information is available on Complex2030PEIS.com.

THE OAK RIDGE PUBLIC HEARING
November 13, 2006 *
11AM-3 PM & 6PM-10PM
Oak Ridge City Center Club Room, 333 Main Street.

OAK RIDGE ENVIRONMENTAL PEACE ALLIANCE
P.O. Box 5743, Oak Ridge, TN 37831 • 865 483 8202
orep@earthlink.net • www.stopthebombs.org

1|2O (cont)

THE WITNESS OF FAITH COMMUNITIES

Most US religious bodies have spoken forcefully and prophetically about nuclear weapons. Here is a selection of voices:

UNITED METHODIST BISHOPS

We believe that the spirit of the nuclear non-proliferation treaty is to reduce and eventually eliminate the possibility of a nuclear disaster. It means not only to stop the nations that do not currently have nuclear weapons from developing such weapons of mass destruction in the future, but also to reduce and eventually to eliminate all nuclear weapons, including the 10,000 possessed by the United States.

Therefore, we urge the governments of all nations developing or possessing nuclear weaponry to stop further development and to vow never again to use their nuclear arsenals as a way of solving international conflicts. We call upon these nations to begin immediate negotiations with the rest of the world toward a complete ban on nuclear weapons.

Adopted May 2005

ROMAN CATHOLIC CHURCH

The truth of peace requires that all—whether those governments which openly or secretly possess nuclear arms, or those planning to acquire them—agree to change their course by clear and firm decisions, and strive for a progressive and concerted nuclear disarmament.

Pope Benedict XVI, January 2006

If biological weapons, chemical weapons and now land-mines can be done away with, so too can nuclear weapons. Since nuclear weapons can destroy all life on the planet, they imperil all that humanity has ever stood for and indeed humanity itself.

Nuclear weapons are incompatible with the peace we seek for the 21st century. They cannot be justified. They deserve condemnation. The preservation of the Non Proliferation Treaty demands an unequivocal commitment to their abolition.

Archbishop Renato Martì
to the UN First Committee, October 15, 2001

MUSLIM AMERICAN SOCIETY

We should oppose the development, testing, and deployment of nuclear weapons on the following three principles:

Nuclear weapons are Haram (unlawful) because they are indiscriminate weapons of mass killing and environmental destruction. By their very nature, nuclear weapons cannot distinguish between military and civilian targets; everything, and everyone, is annihilated in a nuclear attack.

Testing and deploying nuclear weapons is contrary to international law.

Developing nuclear weapons threatens the health and economic well being of all human societies, even when these weapons are not used in war.

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PC_678

Levens, Matthew

From: Olaf Egeberg [olaf@changesahead.net]
Sent: Friday, February 22, 2008 9:51 AM
To: Complex2030
Subject: WMDs

Attachments: image001.gif

image001.gif
(316 B)

Theodore,

This article was written for 6.5 billion people. Hopefully, you'll find it to be an "activator" in article format. It's a device to trigger action towards having our world become WMD-free. It's an "activator" because it speaks to a DEEPER part of the reader than is usual:

1|16A

--deep enough to motivate many individuals whose job, in some way, supports having WMDs to withdraw their support (quit or be reassigned), starting right now.

--deep enough to motivate a change of mind with many individuals who are in power positions (government officials, politicians, military officers, etc.), motivating them to redirect WMD funding towards (A) immediately dismantling WMDs and (B) supporting those who lose their jobs as they go for new work.

--deep enough to motivate those of us who want a WMD-free world to be of real help to those who lose their job and need assistance in their transition into non-WMD employment.

--deep enough to motivate a world of people to take an evolutionary step into the WMD-free world that's waiting, a more secure planet for all our generations to come.

This article is adapted from the last few pages of the book: COMING HOME.
(The book is free and online.) I believe the article is controversial enough to build its own way into public attention -- once we give it a boost.

Best wishes,

Olaf

_____

WMD Free At Last

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Egeberg, Olaf
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Olaf Egeberg

PC_678

The intensifying WMD problem

We live with the increasing threat that someone is going to use a nuclear weapon. These weapons are proliferating. Information on how to build them is out now (on the Internet, of course) and stolen materials are available. On top of that some nuclear weapons ("suitcase bombs") have gone missing since the dismantling of the Soviet Union. And now we have suicide bombers who can take a small nuclear bomb wherever around our globe they are directed to go.

So more of these super-lethal bombs are out there now. And with this increase in nuclear weapons, I believe we're also getting an increase in governments, terrorist groups and crazed individuals who are willing to use them.

Along with nuclear weapons there is also the terrible threat of biological weapons and other "Weapons of Mass Destruction" (WMDs). It's, therefore, all WMDs that we need to address now. Because a single use of any one of these weapons could create the worst horror for millions of us in just a few seconds time. In that terrible moment countless unsuspecting and innocent persons, possibly you and/or I, would meet a violent death (or a drawn-out death from a biological agent). And for those who are exposed but not killed by the weapon, life would continue on from that moment as suffering, bone deep, physical and mental, suffering.

A FAMILY affair

The seriousness of a WMD event and the increasing likelihood that one will happen puts us now in an EMERGENCY situation, world-wide. This is a true emergency because NO ONE is in control. No nation or even association of nations is now able to stop the "illegal" development of WMDs. The instructions are on the Internet. No one is in charge and the danger is only getting worse. We're heading straight for an event in which a great number of us are going to die or be left with anguish and there is absolutely no need for that to happen.

Nuclear, biological and other weapons of mass destruction are just too terrible for us to have on this planet any longer. Their possession is no longer a particular government's or organization's affair. It's a family affair now (our global, Homo sapiens family). With their proliferation we're seeing an immense danger for all of us, world-wide. No one is in control.
It's time for our family to take charge of the WMD issue.

And because a single event is so horrific, and because the likelihood of one happening is getting closer and closer, then right now, this very minute, is the very best time for us, as a world-wide family, to begin dismantling our WMDs. This is an EMERGENCY! We have this unbelievable event ready to happen.
Is anything gained by waiting one day longer? Do you expect a better opportunity to come up at a later time? We have to snap out of our dream state now. SNAP! We're in a bad WMD situation and we have to act fast. This is the exact right time for the dismantling to begin.

Our NEW global situation

It's easy to understand how and why these weapons were developed, but their need is over now. Our world is in a new and different situation now that WMD-making secrets are out on the Internet and terrorists are now in the picture. What's even more important about our situation at this time, is that we're beginning to wake up to our greater possibilities here. So suddenly all WMDs are obsolete. They have NO place in the world of our bloom. Our life here together is too precious for us to allow this threat any longer, not even one second more.

It's, therefore, no longer right for any one of us to continue supporting any weapon of mass destruction (and thus the perpetuation of a WMD world).
Because we're a greater people who are here for a greater life than WMDs will allow us.

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It’s, therefore, no longer right for any politician, or representative, or government official or organization leader to support having WMDs. It’s not right for any president or leader of any country, or any military or paramilitary officer or anybody else to have the authority for perpetuating WMDs any longer. Our reality has changed.

The action required

We now need these people of power to start work right away towards the dismantling of the WMDs that their government or organization has been having up to now. We need these people to do what it takes to reassign all the funds that have been intended for supporting WMDs to now go (A) towards the elimination of WMDs and (B) towards the immediate support of those who lose or leave their WMD related job (supporting them in their transition into new employment).

And it’s not just the leaders and people of power who are responsible for stopping the WMD threat. If your work supports having WMDs in any way, then you are needed to withdraw your support now, too. That’s the action that’s necessary for this emergency to end.

Whether you are a secretary, or a mechanic, or a bookkeeper, or a janitor or an office manager whose work, in some way, supports having WMDs (and, therefore, the perpetuation of a WMD world), or if you are a driver, or military person, or contractor, or laborer, or scientist, or trash collector, or technician or any one else whose job supports the having of WMDs, please stop right now (as soon as it’s possible). Because that “stopping” speeds our move into the WMD-free world that’s waiting.

Our higher authority

It doesn't matter what you have been asked to do or how important the people are who expect your continued support for WMDs, you are acting from a higher authority now. You are acting for the family. More important than following the orders of a government or military official or of an official in any organization that uses terrorist tactics, is acting for the good of our family, our global promise – brothers and sisters, all. The security and wellbeing of our family means that no government or group can continue to hold on to its WMDs. They’re not allowed any longer.

So we have a much higher authority than any government or organization has over us. We have our precious family, world-wide that we’re all related to (as DNA proves), and we don’t want the family hurt.

So it doesn’t matter how big an official your boss is, or how much authority your government or organization has given him or her, you are your own person. Speak for the family.

“Boss, I can’t do this any more. Please have me assigned to work that doesn’t support having WMDs. WMDs are out of any nation’s control now and the chances of an event are only increasing with time. This disarmament occasion might be our LAST opportunity to eliminate these things. You and I are needed in the dismantling to remove our support, starting right now.”

That’s one way to end the WMD support-work that you have been doing. There are countless other ways, too. Say what you have to say and do what you have to do to remove yourself from doing WMD support-work any longer. Doing that adds its measure towards our emergency’s end.

Going first

Don’t expect a rush of approval for what you are doing. People who are first to withdraw their support have to do so even when others don’t yet understand. So greet the challenges that come from being the first (or among the first) person in your office, or your group, or your military unit, or your organization, to withdraw your support for WMDs. Because someone there, anyone, has to be the first eventually. You’ll be acting to end the emergency and to bring an important security to our family, all 6+ billion of us, family members every one. And what you do will make it, of course, a great deal easier for others to follow.

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Besides withdrawing your support from having WMDs, your attention is also needed for getting WMD funds redirected quickly towards the dismantling of these weapons, and towards giving you (and others who leave or lose their
WMD related job) support for your transition.

What’s more, if you leave or lose your job because it serves WMDs in some way, then ALL of us, not just the government, should be giving you support.
By your good act you have helped us in our need for a WMD-free world. We’d like to show our helpfulness, too. By withdrawing your work for WMDs, you give a gift of great value to the whole human family and to all our generations to come. Your actions take us all a step further into a world that’s safe, caring and free.

Getting support

It’s not an easy thing that you do, to be sure. We’re aware of that. There are all kinds of explanations, expectations and pressures for you to keep doing the work you have been doing. And you might have a big family to feed, or huge debt, or big expenses for housing, children’s education, transportation, health care and other important needs. Unless support is quick in coming, you might not have enough money to pay for these expenses.
In this temporary situation things will be tough before they get better.

All this is the very reason we non-WMD people need to be there for you, right away. Your difficulties can’t wait for government support to materialize. Let us know who you are so we can be useful. We want to learn how to be a supportive family now. This is an emergency.

Our neighborhoods can be especially useful at this time if they are organized to be helpful. And we’ll need websites that help us help you and others who have left or lost their WMD support job. We’ll need websites for getting new employment, and for getting training, if need be, and for finding financial assistance, helpful contacts, support people, housing opportunities, support groups and other forms of care. The more helpfulness we can give to all who leave WMD related jobs, the faster the exodus happens. By the largeness of our generosity we make it easier for the emergency to end quickly, and for these weapons to become history as we make our move now into a world that is WMD-free.

By withdrawing your support from WMDs you have a direct effect on bringing a more evolved world into being. And when we’re WMD-free, at last, and we’ve gotten used to being in that safety, people will look back to see how, after decades of their threatening presence, we became a WMD-free world. Many will be interested to know about those who brought their WMD support-work to end suddenly, and what it was like for those individuals who were among the first to stop. They will know that they have their security because of you.

Don’t worry at all about someone else taking your job when you leave.
Funding for that job ends as momentum builds and WMD funds are reallocated.
What’s more, anyone who has been touched by the “Wake Up” or by their own larger thinking, won’t even think of taking that job. Because the person who takes your job will be supporting the continuation of a WMD world and because of that she or he is a true accomplice in a most horrific crime against humanity when, not if, one of those things goes off anywhere world-wide. Anyone who takes up your old WMD related work will be supporting the intensifying likelihood of a great family tragedy. However, they will quickly follow you out of that work as soon we help them to understand that supporting WMDs any longer, perpetuating a WMD world, is a wrong, unevolved, unauthorized, unethical and hurtful thing to do.

What about “hold-outs?”

“But,” you might say, “what if most governments and groups dismantle their WMDs but not everyone follows? What if there are ‘Hold Out’ governments or groups that hang on to their WMDs so they can wave them at us and demand that we do what they want?”

We’ve long been perpetuating the belief that if we keep our WMDs, no other power would ever use theirs against us because the retaliation would be too terrible. But that belief doesn’t work any longer. These are different times now. We now have terrorist organizations (not just nations) that can bring on a WMD event. And these groups are rather secret and dispersed. If one unleashes its WMD among us, there’s no nation or place to bomb in retaliation. WMD retaliation is simply out of the question. The old belief

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doesn't hold up any more. So the basic rationale for continuing to have these things is now gone. Only vague, obsolete fears keep WMDs going.

Besides, any government, group or individual who holds out and keeps their WMDs after everyone else has dismantled theirs, can expect to be the target of a weapon 10,000 times more powerful than their WMDs. I'm talking about a world of people who now have the Internet so we can organize to radically isolate that government or group and give it a most miserable time until it is eager to join the rest of us in our move into a WMD-free world. How great the mistake would be to hold out and keep WMDs when our whole family of non-WMD people would feel seriously violated, mad and fired up to organize against you. That's a LOT of power. It doesn't matter at all how big and powerful your government might be, our family is a LOT bigger and a LOT more powerful, still. We have more than enough capability to cut off its oil, raw materials, money exchange, manufactured goods, services and any other trade it normally depends on from non-WMD people.

And ANY banker, broker, investor, business owner, transporter, or supplier who continues to support a "hold-out" government or group that perpetuates the WMD world, is hurting us all. Any officer, or technician, or worker, or manager that allows continued trade, is only perpetuating the emergency we need to end now. These individuals will do what they do only as long as they are ignorant of how really wrong that action is at this time. Because our situation has changed. They won't, however, stay ignorant long in a world of people who are eager to be WMD-free. That education should be easy for us to deliver.

As a hold-out nation, or group or individual, you, therefore, won't have much support to carry on. Besides, you won't find it at all worthwhile to hang on to your WMDs while the rest of the world is coming together for our security and prosperity and a WMD-free future for all our generations to come. There are over 6 billion sisters and brothers who don't want to be touched by a WMD and don't want any weapons around that can cause death and terrible suffering to so many innocent and unsuspecting persons, millions of us, and all of a sudden. Boom. Just like that.

If you were a hold-out government or group, you would quickly find that a WMD would not really be useful any more. Because you can't have dominance over a family of 6 billion people. You would have to have a soldier for every three or four people to keep us from organizing. If you tried to threaten even a part of this family you would find a world of people who would be quick to make you wish you hadn't. It's just too easy to organize now, now that we have the Internet. And organizing to protect ourselves from the immediate threat of such a terrible weapon is something everyone would be eager to do.

Governments that go first

Expect, therefore, that the governments or groups that go first will do so knowing that others might be hesitant for a while or not yet interested.
That's to be expected. We will never be at a time when everyone disarms their WMDs at the same moment. Isn't that so? That means we will never move into a WMD-free world unless some nation leads the way.

Hooray, therefore, for the government that goes first. Because it will start dismantling all its WMDs while other governments or organizations still have theirs. After the many decades we've had of WMD threat, fear, cost and oppression, this leadership move is a heroic act. It's heroic because it, at last, breaks through the impasse so we can be set free. Without some nation being first we won't ever get ourselves out of a WMD world and into our glory.

Even more important, however, is the Hooray, Cheers and Toot-Toot for you, me and every other individual who helps this advance to happen. We're birthing a WMD-free world for heaven's sake. We're acting as a family that wants to get rid of these things and have a better life here together.

Bravo!

qThis article was adapted from the last pages of the book: "COMING HOME: A Crossover Bible

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PC_678

For Christians, Muslims, Jews And Members Of Other Religious Faiths As Well As For Thoroughly Non-Religious Persons." This little (172
page) book is available free online (in safe PDF format) from HYPERLINK
"http://www.changesahead.net/"www.changesahead.net.

The book comes in hardback form, too. You can order it at cost ($20.48 plus
shipping) from Lulu publishers: HYPERLINK
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11:05 AM

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Eggenberger, A.J.
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PC_405

Buenaflor, Delight

From: Complex2030 [Complex2030@nnsa.doe.gov]
Sent: Thursday, May 01, 2008 1:52 PM
To: Rose, Jay; Boltz, Jackie; Buenaflor, Delight
Subject: FW: DNFSB LETTER ON POOR SAFETY OF OLD LANL CMR FACILITY

SE34F9~1.PDF
(75 KB)

-----Original Message-----
From: Rhgilkeson@aol.com [mailto:Rhgilkeson@aol.com]
Sent: Wednesday, April 30, 2008 10:30 PM
To: Complex2030
Cc: Rhgilkeson@aol.com
Subject: DNFSB LETTER ON POOR SAFETY OF OLD LANL CMR FACILITY

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A.J. Eggenberger, Chairman
John E. Mansfield, Vice Chairman
Joseph F. Bader
Larry W. Brown
Peter S. Winokur

DEFENSE NUCLEAR FACILITIES SAFETY BOARD

625 Indiana Avenue, NW, Suite 700 Washington, D.C. 20004-2901
(202) 694-7000

October 23, 2007

The Honorable Thomas P. D'Agostino
Administrator
National Nuclear Security Administration
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585-0701

Dear Mr. D'Agostino:

1|7N

The National Nuclear Security Administration's (NNSA) current plan for sustained manufacturing of plutonium pits, essential to national security, relies on continued operation of the 55-year-old Chemistry and Metallurgy Research (CMR) facility at Los Alamos National Laboratory (LANL). The Defense Nuclear Facilities Safety Board (Board) believes that continued operation of the CMR facility in its current condition poses significant risks to workers and the public. Given the age, material condition, nuclear material inventory, and seismic capacity of CMR, it is important that NNSA fully understand these risks in its continued use of the facility.

2|14K13

The CMR facility is known to have serious vulnerabilities, such as the lack of robust building confinement to prevent a release of radioactivity during an accident. In the late 1990s, the Department of Energy (DOE) decided to scale down a planned CMR facility upgrade project and focus on safety system upgrades required to support safe operation until the CMR Replacement Project was completed in 2010. This decision to abandon a complete facility upgrade was due primarily to the identification of a seismic fault under two wings and the susceptibility of all the wings to structural collapse due to ground motion from a 500-year return period earthquake. While subsequent actions were taken to reduce combustibles and material-at-risk in the CMR facility, the safety of the facility has not been reassessed since the governing safety basis was approved in 1998.

In a letter to the Board dated February 16, 1999, the DOE Office of Defense Programs enclosed a copy of the "Strategy for Managing Risks at the CMR Facility at LANL." In that document, DOE outlined near-term and long-term actions to manage the risk at the CMR facility and continue safe operations until 2010. It was envisioned that the CMR Replacement Project would be completed by 2010; however, the Replacement Project has experienced significant delays, is now nominally projected for completion in 2016, and faces continued susceptibility to year-to-year budgetary uncertainty. Consequently, the CMR facility will likely be required to support pit production activities to 2016 and beyond.

Eggenberger, A.J.
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The Honorable Thomas P. D'Agostino Page 2

3|19A The Board understands that LANL plans to develop a CMR facility safety basis for post-2010 operations, with approval and implementation of this new safety basis in 2009. It is unlikely that this effort will eliminate or mitigate the safety risks of operating the CMR facility beyond 2010 without significant facility upgrades or mission changes. This timetable leaves little time for NNSA to complete any necessary safety system upgrades or identify alternative strategies for meeting national security priorities. As noted above, the situation is further exacerbated by delays and continued budgetary uncertainty afflicting the CMR Replacement Project.

Therefore, pursuant to 42 U.S.C. 2286b(d), the Board requests that NNSA submit within 60 days of receipt of this letter a report and briefing providing (1) a safety rationale for continuing the operation of CMR, and (2) a detailed schedule of NNSA's actions to assure safe operation of this facility.

Sincerely,

A. J. Eggenberger
Chairman

c: The Honorable J. Clay Sell
Mr. Donald L. Winchell, Jr.
Mr. Mark B. Whitaker, Jr.

Ehmann, Helen
Page 1 of 1

PC_896

Levens, Matthew

From: Helen Ehmann [helenehmann@gmail.com]
Sent: Thursday, March 27, 2008 12:54 PM
To: Complex2030
Subject: Opposition to Complex Transformation

1|7N
2|10B I strongly oppose the administration's proposal to build the Chemistry and Metallurgy Research Replacement plant (CMRR) at Lost Alamos New Mexico to produce plutonium pits or "triggers" for Nuclear Weapons.

3|1F I believe that this act would be in direct contradiction and a reversal of the goals of the nuclear Non-Proliferation Treaty (NPT) which the United States is a signatory to.

4|1J At a time when the United States is urging countries such as North Korea and Iran to reframe from producing nuclear weapons, at a time when the United States is at war over the possiblity of the existence of Weapons of Mass Destruction (WMDs) how can we as Americans, in good consceince, continue to build our arsenal of nuclear weapons.

5|9H I also, as a federal taxpayer, would like to condemn any further action to be taken by the Energy Department that would increase spending for the purpose of increasing the American capacity to build Nuclear Weapons. Your current estimate of cost for the CMRR is $2 billion. That is $2 billion too many. Thank you for your consideration and time in this matter.

Sincerely,

Helen Ehmann

Ehrlich, Jeremy

Page 1 of 1

PC_1761

Levens, Matthew

From: jaehrlich@gmail.com
Sent: Sunday, April 06, 2008 11:57 AM
To: Complex2030
Subject: Comments: Complex Transformation SPEIS

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|13A
2|14M.3 This nation needs to do everything it can to reduce the perils of accidental nuclear launch and the more mundane peril of nuclear waste disposal.

3|16A My comment is that the DOE should not upgrade its nuclear capability; rather, it should seek to reduce the country's capability and reliance on that capability.

Sincerely,
Jeremy Ehrlich
1021 East Capitol St. SE
Washington, DC 20003

cc:
Delegate Eleanor Norton

1

Eisemann, Fran

Page 1 of 1

PC_1600

Levens, Matthew

From: eisewolves@aol.com
Sent: Saturday, April 05, 2008 9:21 PM
To: Complex2030
Subject: Nuclear Nonsense

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|1E Complex Transformation is a giant handout to the arms industry, encourages world-wide spread of nuclear weapons, and violates the Comprehensive Test Ban Treaty.

2|16A Make us safer -- get rid of all nuclear weapons, world-wide.

Include my comment in the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project.

Sincerely,
Fran Eisemann
P.O. Box 622
Speonk, NY U.S.

cc:
Senator Charles Schumer
Senator Hillary Clinton
Representative Timothy Bishop

1

Elghonimi, Reem
Page 1 of 1

PC_1510

Levens, Matthew

From: Reem Elghonimi [relghonimi@verizon.net]
Sent: Friday, April 25, 2008 10:42 PM
To: Complex2030
Subject: I Oppose the Production of New Plutonium Pits

Dear Mr. Wyka,
I have 3 reasons I am against producing more nuclear armament: and they are a 12 yr-old, a 10-yr-old, and a 3 yr-old. I cannot imagine a future for my innocent children that is littered with violence, destruction, and so much wasted potential!

1|9B I want to hear that $150 million is going towards their education, their ability to live in a secure world made through ecologically sound decisions and peaceful dialogues and initiatives with other countries and cultures rather than hostility and an arms race!

2|1J I see it as hypocritical that we ask other countries to stop all nuclear projects and we are increasing ours! And we already have enough plutonium pits to destroy each other many times over...

I hope the children and loved ones in your lives ensure that you will make the right decision and protect their peaceful future.

Reem Elghonimi
2514 Rodeo Ct.
Garland, TX 75044

1

Elizabeth, Lynne
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PC_26

UNOFFICIAL BALLOT
NATIONAL REFERENDUM ON
THE FUTURE OF NUCLEAR WEAPONS

INSTRUCTIONS TO VOTERS: USE BLACK OR BLUE PEN ONLY. To vote on Measures A and B, fill in the oval after the word "Yes" or "No." You may add your own comments below.

Separate ballots are available for the National Nuclear Security Administration of the Department of Energy, and United States Senator and Representatives. Voters are encouraged to cast all four ballots.

MEASURES SUBMITTED TO THE VOTERS
NATIONAL

1|9A **A** Shall the United States proceed with a$150 billion plan to modernize its nuclear weapons research, development and manufacturing complex in order to replace its existing nuclear weaponsand establish the capacity to build new types of nuclear weapons by the year 2030 ("Complex 2030")? YES ○ NO ●

2|1F **B** Shall the United States, in compliancewith its obligation under the Nuclear Non-Proliferation Treaty, comnit to the global elimination of nuclear weapons no later than 2030 by initiatng negotiations leading to conclusion of a verifiable treaty, under strict and effective international control? YES ● NO ○

3|16A; 2|1F (cont.) **COMMENTS:** Let us contribute to world peace by eliminating nuclear weapons, 4|7G 5|7L

NAME Lynne Elizabeth
ADDRESS 480 42nd St. Unit E
Oakland CA 94609
SIGNATURE Lynne Elizabeth DATE 2/18/08

Elliott, Marian

Page 1 of 1

PC_622

Levens, Matthew

From: Marian Elliott [kayelliott@gmail.com]
Sent: Saturday, February 23, 2008 3:10 AM
To: Complex2030
Subject: Opposing plan for new plutonium pit plant

Marian Elliott
2238 Garden Crk Hgts Rd
Casper, WY 82601-8260

February 23, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A; 2|1J I am not in favor of the plan to build a plant to produce plutonium pits for nuclear weapons.

I have children and grandchildren and I do not want them living in a world where we run the risks of starting major conflicts by producing nuclear warheads. Conflicts that could escalate to full nuclear wars!!!

This is a very bad idea and is indicative of an administration run amuck.
Please end this before it begins.

Sincerely,

Marian Elliott
307-266-2562

1

Ellis, Audrey

Page 1 of 1

PC_1712

Levens, Matthew

From: audrey ellis [wellis77@sbcglobal.net]
Sent: Wednesday, April 02, 2008 9:37AM
To: Complex2030
Subject: why do we have to do this

audrey ellis
2027 south austin street apt. c-30
amarillo, TX 79109-1950

April 2, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A please no more nukes lets just get along, no more please lets just live in peace snd harmony

Sincerely,

audrey ellis
8063524061

Ellis, Lois
Page 1 of 1

PC_37

Theodore Wyka
Complex Transformation SPEIS Document Mgr.
U.S. Department of Energy
1000 Independence Ave. SW
Washington, D.C. 20585

Dear Sir, 18 February, 2008

1|16A This is probably the most important letter I will ever write !!
As an 11th generation American Citizen, Voter and Tax-payer,
I write in protest of the proposed Complex Transformation plan.

2|1F 3|3A It is outrageous that although the U.S. committed to a policy of Non-proliferation and disarmament of nuclear weapons in 1970, we are now poised to build even more and deadlier weapons of mass destruction.

4|1J The more and deadlier bombs we build and stockpile, the more other nations, out of fear, will build up their Nuclear Weapons. This is a scandalous race to achieve Nuclear supremacy.

5|9A Furthermore, the $40 Billion dollars a year to maintain this arsenal is digging a bottomless hole of economic disaster for our children and grandchildren. And it probably will cause the downfall of our Nation, as we know it.

6|20.0 Morally, do we really need to prove how great we are by blowing up God's earth and all His people ! Didn't Hiroshima and Nagasaki teach us anything about the horrific devastation of the earth and its people??

Our country needs more peace makers - not war hawks, war profiteers and the building of a military empire.

Sincerely,

Lois A. Ellis

Lois A. Ellis
30025 City Center Dr.
Warren, MI 48093

Ellis, Matthew
Page 1 of 1

PC_1019

GBN

The Santa Fe Green Business Network is a coalition comprised of concerned and inspired folks from all sectors of our community; including business, non-profit organizations, educational institutions, government, and just ordinary citizens.

1|2O Our mission is to foster an on-going open & informative forum that addresses *all* aspects of sustainability and to be a network of people who engage in the transformation of Santa Fe and our region into a more ecologically and economically viable community.

You are invited! Attend the Santa Fe Green Business Network monthly networking breakfast. Meet, Eat, Share, and Learn.

We meet each and every third Friday of the month at;

Whole Foods Market Community Room
753 Cerrillos Road
(The smaller detached building facing Cerrillos Road)
7:30 - 9 am Free and open to all.

Our next meeting is scheduled for Friday March 21, 2008

For more information, please contact;

Matthew Ellis, Organizer
505.577.3902 SFGreenBusiness@yahoo.com

In partnership with;

SANTA FE ALLIANCE

WHOLE FOODS

Elrick, Krista
Page 1 of 1

PC_248

KRISTA
ELRICK

March 14, 2008

Mr. Ted Wyka, NNSA
Office of Transformation NM-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Ted Wyka,

I am writing this letter **to protest the Department of Energy's plans for Complex Transformation with Los Alamos National Labs**. Northern New Mexico does not need any more plutonium triggers for nuclear warheads, we need the **CLEAN UP** completed for all the contamination that has already been created and stored at LANL.

1|16A;

2|7J

I am sending you my personal appeal because I am a ten-year survivor of THYROID CANCER. I believe the cause of my disease is from the footprint of true waste that has contaminated in our water system. As a self-employed artist, my health insurance costs are now out of range for me. Indeed, Presbyterian Insurance Company recently declined my coverage because of the cancer and thyroid disorder.

It is time to clean up the pollution from past years and turn the National Research Labs into sustainable clean energy opportunities.

It is time to wake up to Peace!!

Respectfully yours,

Krista Elrick

2 CAMINO MAYANCITA ■□ SANTA FE NEW MEXICO 87507 ■□ 505.438.4441 www.KristaElrick.cc

Emerson, Jessie
Page 1 of 1

PC_2004

Levens, Matthew

From: Jessie Emerson [osoherbalsjessie@yahoo.com]
Sent: Monday, April 28, 2008 10:02 AM
To: Complex2030
Subject: war and war implements

1|16A
2|9B

I do not want the complex Transformation in New Mexico or anywhere else on the planet. Why not use the brilent minds up there to create peace and prosperity, to feed the hungary and to find solutions to the mess created by man, global warming?

Jessie Emerson

Be a better friend, newshound, and
know-it-all with Yahoo! Mobile. Try it now. http://mobile.yahoo.com/;
_ylt=Ahu06i62sR8HDtDypao8Wcj9tAcJ

1

Emmert, Stephanie
Page 1 of 1

PC_1579

Levens, Matthew

From: beadelf@aol.com
Sent: Saturday, April 05, 2008 7:19 PM
To: Complex2030
Subject: EIS Comment

To: Mr. T. Wyka

1|1J **The Complex Transformation proposal serves no useful purpose in dealing with current international security. In fact, it exacerbates the situation and restarts another arms race.**

Secondly, the DOE proposal is inconsistent with the global goal of stopping nuclear proliferation and moving towards disarmament.

2|1E **The USA can lead by renouncing more weapons and ratifying the CTBT.**

1|1J (cont) **Thank you for your thoughtful consideration.**

Sincerely,

Stephanie M. Emmert
12 Mulrain Way
Bluffton, SC 29910

Get the MapQuest Toolbar, Maps, Traffic, Directions & More!

Employee, Lanl
Page 1 of 1

Ted Wyka
NNSA Office of Transformation
1000 Independence Ave.
Washington, DC 20585
April 22, 2008

PC_931

Mr. Wyka

I am oppose to building Pu pits at Los Alamos. These are my reasons.

1|16A
2|14M.3
3|14J

1. Bechtel employees that are brought in from other sites (non native NMs) will benefit. This is already happening (they 're getting rich we are not).
2. The highly contaminated waste that will be generated will be left in NM (no money for clean-up). This is also already happening now in 2008.
3. The surrounding communities do not benefit except for a few local employees that will do any hazardous work regardless of the health hazards. This are mostly uneducated workers.
4. The management has always been unfair towards minorities. Discrepancies in pay, nepotism etc. Note the lawsuits that have been filed. There will definitely be more in the future.
5. Management has no clue that morale is at it's lowest . Bechtel is for profit they only want to get more taxpayer money.
6. Bechtel has proven not to be a good neighbor. Photo ops does not make you a good neighbor.

I am writing as a LANL employee which is why I can't give my name. I have encountered discrimination throughout my 22 years at LANL.

Thank You,

LANL Employee

Engel, Linda
Page 1 of 1

PC_235

3825 Eastbrook Drive
Muskegon MI 49444
March 13, 2008

Theodore Wyka, Complex Transformation SPEIS
Document Manager
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington DC 20585

Dear Sir,

1|16A I am opposed to the draft proposal named "Complex Transformation" which describes a future America with more nuclear weaponry, research and testing.

2|3A The way to peace is not thru weapons but dialogue. Please stop what I consider to be insane

1|16A (cont) programs. They do not make my Country morally right. Instead, they bleed her of any integrity she may have left.

Sincerely,
Linda M. Engel

England, Lisa
Page 1 of 1

PC_464

Buenaflor, Justin

From: England, Lisa (LNX) [englandlm@y12.doe.gov]
Sent: Wednesday, February 27, 2008 12:40 PM
To: Complex2030
Subject: SPEIS

Good afternoon, Mr. Wyka.

I am writing concerning the SPEIS. The Y-12 has been a part of the United States' nuclear weapons program since the Manhattan Project.
This plant has supported many families, including mine - both of my grandfathers retired from here, my father worked here, and my mother also worked at this site.

1|15A Y-12 is an important part of the local communities & has major impact on the local economies. I know of employees who drive approximately 1 1/2hrs one-way in order to work here & support their families.

We have a specialized, experienced, and dedicated workforce who would like to continue to support the mission of the NNSA & DOE. I would like to express my support & desire for the NNSA to choose the Preferred Alternative Plan so that our communities and families may continue to thrive & so that we may complete our Uranium Processing Facility. We won't let you down!

Sincerely,
Lisa England
Materials Management
Building 9201-1, MS8188
576-2526, 873-4150 pgr.

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English, Joanne
Page 1 of 1

PC_197

1|16A; 2|9H My name is Joanne English. I want to state my opposition to the proposal to spend $150 billion in taxpayer money to develop and produce new nuclear bombs.

3|1J We have enough nuclear weapons to destroy the world already. We need to be reducing and eliminating this destructive force, not building more.

Don't do it.

Joanne English

Joanne English

6812 Thunder Road
Amarillo, Tx 79119

Engstrand, Jean
Page 1 of 1

PC_1097

Levens, Matthew

From: Jean EngstRand [jeane@ellsnet.com]
Sent: Monday, March 31, 2008 2:11 PM
To: Complex2030
Subject: Citizen Comment regarding SPEIS, Complex Transformation

Mr. Wyka:
Just a quick comment:

1|9B What business does the DOE have in dealing with nuclear weapons? Apparently, this current crop of pea-brain bureaucrats thinks the DOE is in charge of needlessly WASTING as much energy as possible, which is what happens in the building, testing, and maintaining of
2|1B nuclear, or any other, weapons. Will somebody please explain to them their job description?

And the idiocy just goes on and on.

Jean EngstRand
7387 Atwood Rd.
Ellsworth, MI 49729

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Enloe, Bill
Page 1 of 1

Page 1 of 1

PC_490

Buenaflor, Delight

From: Bill Enloe [bill@lanb.com]
Sent: Tuesday, April 01, 2008 12:56 PM
To: DIV.Complex.Transformation
Subject: Complex Transformation and Los Alamos

I have attended two hearings on the proposed changes for the Nuclear Weapons Complex. It seems that most of the discussion opposed to the new configuration was focused on protest against the US having Nuclear weapons. That decision will be made by Congress and the President. The focus of these hearings should be on the safety and security of the research and production of environmentally safe and reliable pits for our weapons and other research done at Los Alamos and the other National Labs. It is also important that we do not lose our capabilities to defend our nation against future aggression. While Russia, China, and other countries continue to modernize their nuclear stockpile, we have naively allowed ours to detieriate to a point that it would take many years to reconstitute, if necessary. This situation should be unacceptable to our country's leadership.

1|2F

2|16A

I am not and have never been an employee of the Los Alamos National Laboratory or any of their subcontractors or affiliates. I have grown up in Los Alamos, raised my children here and now have grandchildren living in this community. I resent people opposing improvements to the lab that makes the handling and research on plutonium and other hazardous materials safer. The individuals who work and live in Los Alamos and the surrounding areas should have the safest and most advanced facilities and equipment to ensure a safe and healthy environment. To not provide the best facilities and latest technology when it comes to the most dangerous materials on earth is irresponsible and short-sighted. In Los Alamos it is not a political or military question of what kind or how many weapons we have, it is a question of how safe and good the materials are that go into those weapons. Please give these people the tools to do their jobs properly.

3|10B

The Los Alamos National Laboratory is the key economic driver for Northern New Mexico. No other National Facility has as much responsibility for the education, jobs and stability of a region as LANL. They have balanced the dual role as our Nations key National Laboratory and the only major employer in Northern New Mexico very well. The NNSA and our Congress should be proud of the job that the management and individuals who work at LANL have done and will continue to do with your assistance. Thank you for considering my remarks.

3|10B Cont.

Sincerely

Bill Enloe
CEO and Chairman of the Board
Los Alamos National Bank

Enson, Beth
Page 1 of 1

PC_2090

Levens, Matthew

From: Ray Garcia [rgarcia@taosnet.com]
Sent: Wednesday, April 30, 2008 11:57 AM
To: Complex2030
Subject: New Mexico Complex Transformation

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager, Office of Transformation, NA-10.1 U.S. Department of Energy/NNSA 1000 Independence Avenue, SW Washington, D.C. 20585

Dear Mr. Wyka,

1|7O

I am writing to urge you to select the "No Action Alternative" regarding the development of New Mexico's nuclear weapons industry. We need to dismantle our nuclear weapons and the industry that surrounds them, and put Sandia and Los Alamos labs to work for peaceful solutions to the many crises facing our nation, our species, and life on earth. We furthermore need to work aggressively and tirelessly to dismantle the nuclear weapons programs of all our allies and all of our enemies. No other action makes any sense, especially at this critical juncture during which competition for natural resources is so intense and cultural and national tensions are so severe.

2|2E1

Such a very large and important matter requires far more deliberation on the part of New Mexico citizens. Very few hearings have been held throughout the state, and the scheduling of some of those had to be fought for by citizen activists. The "No Action Alternative" will allow for a full public airing of these vital issues. I know the nuclear industry is eager to sign contracts and force policy decisions before the change of political leadership statewide and nationwide this November. Do not allow them to do so!

3|16A

We have far more pressing matters to attend to as a nation than lining the pockets of the military contractors. Nuclear weapons do not promote peace and I am terrified to consider the world my daughter will face if we allow a new generation of nuclear weapons to be built and the arms race to continue.

Sincerely,

Beth Enson
PO Box 503
Arroyo Seco, NM 87514

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5/28/2008

Erdman, Daniel

Page 1 of 1

PC_1706

Levens, Matthew

From: anne.daniel@juno.com
Sent: Friday, April 04, 2008 12:10 AM
To: Complex2030
Subject: Draft Complex Transformation - Written Comments

Draft Complex Transformation
Supplemental Programmatic Environmental Impact Statement U.S. Department of Energy
National Nuclear Security Administration

Written Comments

1|16A The environmental impact of the Complex Transformation will be disastrous. Thanks to our fossil fuel profligacy over the past 100 years, global warming presents the greatest environmental catastrophe the human race has ever faced. Instead of putting our best and brightest scientific minds to work on how best to respond to global warming, the complex transformation project will continue to employ the vast majority of these scientists and technicians to solving a non-problem, that is, how to produce more efficient nuclear bombs.

2|14M.3 The plutonium pit production slated for Los Alamos will damage the environment. The danger to the physical environment by increased enrichment of plutonium with its huge disposal problems is so obvious as to merit no further mention.

3|1J The effect on the world political environment will be every bit as damaging. Around the world, millions of impoverished people resent the United States and the neo-liberal globalization that enriches us at the expense of others in an unbalanced and unfair exchange of goods.

4|13A.1 This environment of hatred and fear (enforced by our military might since the 1950's when George F. Kennan verbalized the doctrine) can only worsen as the USA is seen to be moving ahead with the production of more sophisticated nuclear weapons. Terrorism is but one byproduct – though the most dangerous in the present and immediate future -- of such an atmosphere.

5|13A 3|1J (cont) Because nuclear weapons are useless against terrorists, further pit production and a new generation of nuclear weapons will provide less rather than more security for the USA. Better to spend the money securing existing nuclear material so that terrorists do not make a dirty bomb. Yet how can the USA credibly lead the nations of the world in securing fissionable material when it has lost credibility by initiating a new arms race?

1|16A (cont) Finally, if the goal of US policy is to reduce the number of nuclear weapons, then let the practice reflect the policy. Sandia, Los Alamos, and the rest of the labs should be put to work dismantling nuclear weapons, not building new ones.

Daniel Erdman
April 3, 2008

3501 Anderson Ave SE
Albuquerque NM 87106
505-266-8446

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Erickson, Jane

Page 1 of 1

PC_1208

Levens, Matthew

From: RODNEY ERICKSON [janerodney@sbcglobal.net]
Sent: Monday, April 07, 2008 8:39 PM
To: Complex2030
Subject: nuclear weapons proposal

Dear Mr. Wyka:

1|16A Add my name to your list of people strongly objecting to the thought of building new nuclear weapons.

2|1F For fifty years our nation was striving to cut back on nuclear proliferation. We signed a Non-Proliferation Treaty pledging our commitment to that goal.

3|1J Why would we want to make a U turn and start increasing nuclear weapons? Obviously it would start an arms race. Can you imagine anything more deadly?

I agree with Henry Kissinger, George Schultz, William Perry, Sam Nunn and millions of Americans that we need "a world free of nuclear weapons" as a "bold initiative consistent with America's moral heritage".

Don't go in the opposite direction which would be in total contradiction to our moral heritage and would endanger all of us.

Thank you.

Jane Kelley Erickson

Erickson, Steve

Page 1 of 1

PC_2114

Levens, Matthew

From: Steve Erickson [erickson.steve1@comcast.net]
Sent: Monday, April 28, 2008 3:26 PM
To: Complex2030
Subject: CEP Comments on Complex Transformation SPEIS

April 28, 2008

Mr. Theodore A. Wyka
Complex Transformation, SPEIS Document Manager Office of Transformation NA-10.1 Department of Energy 1000 Independence Ave. SW Washington, D.C. 20585

Dear Sir:

Citizens Education Project, a Salt Lake City-based nonprofit organization dedicated to social and economic justice, submits the following comments on the Complex Transformation Supplemental Programmatic Environmental Impact Statement.

1|16A We do not consider the proposed development of new facilities to create new nuclear warheads to be transformational in the least - it is at best a step backward, a lurching return to a Cold War mentality and approach to international relations. In fact, this proposal incorporates no real plan for the future role of nuclear weapons in national security strategy, and nothing to justify the need for or usefulness of new or additional nuclear weapons. There should be NO ACTION until a comprehensive nuclear security and
2|1C nuclear weapons strategy is proposed, fully debated and endorsed by the Congress.

3|1J The production of a new generation of nuclear weapons is a waste of billions of dollars, and is counterproductive in that it will encourage nuclear proliferation. Renewed production will lead to damaging and costly health and environmental impacts as it has done in the past.
4|8B Creation of new nuclear weapons will inevitably lead to renewed nuclear testing Building new bombs will only increase the pressure to eventually use them.

5|5C1 There is no demonstrated need for producing 50 to 80 new plutonium pits per year. Nor is there any urgency to build new pits, as the existing pits in the stockpile will last for 100 years or more. There is no need for a new Reliable Replacement Warhead (RRW) and it should be canceled, as the current stockpile is well-maintained and remains a credible
4|8B (cont) deterrent. The supposed need for new warheads to assure "safety and reliability" is simply a grand and - without testing - dangerous delusion and deception.

1|16A (cont.) As there is no need for the RRW, then there is no need for complex transformation. The Chemistry and Metallurgy Research Replacement Project (CMRR) at Los Alamos and the Uranium Processing Facility (UPF) at Oak Ridge likewise should be canceled.

Steve Erickson
Citizens Education Project
444 Northmont Way
Salt Lake City, UT 84103

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Ervin, Russell

Page 1 of 1

PC_629

Buenaflor, Delight

From: Rusty Ervin [rervin@lanl.gov]
Sent: Tuesday, March 11, 2008 9:15 AM
To: DIV.Complex.Transformation
Subject: Form posted from Microsoft Internet Explorer.

Last Name=Ervin
First Name=Russell
Email Address=rervin@lanl.gov
Street Address=10 Camino Giron
City=Santa Fe
State=NM
ZIP Code=87506
Comments=My view on the Lab Complex transformation is pretty simple. In the world we are subject to a very basic concept that seems to be at the root of most issues, "Supply and Demand!" We want and need oil so the demand is high consequently leaving us vunerable to the people that control/supply the oil. Alternative fuels and efficient mecanics would seem to be the path forward here. Same with drugs, we spend billions of dollars trying to enforce the laws yet if you would treat the people and cut off the demand we would be more sussessful. Our complex should also include in its decision making process review and prioritization based on the basic principle of "Supply and Demand." We should ask ourselves the questions, "where could we limit demand that would have the largest impacts in the security and well being of our nation.

1|20

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Esparza, Eva
Page 1 of 1

PC_1637

Levens, Matthew

From: lawlereva@hotmail.com
Sent: Saturday, April 05, 2008 3:43 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|16A I think nuclear weapons should be eliminated. We can lead the world to eliminate nuclear weapons around the globe so that future generations will not be threatened or victimized by the indiscriminate death and destruction caused by the use of nuclear weapons.

Sincerely,
Eva Esparza
2106 Benwick
Austin, TX 78723

cc:
Senator Kay Hutchison
Representative Lloyd Doggett
Senator John Cornyn

1

Ettinger, Albert
Page 1 of 1

PC_1572

Levens, Matthew

From: a.ettinger@comcast.net
Sent: Saturday, April 05, 2008 8:43 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

So, with your program for enhanced, new generation of nuclear weapons, what are we planning for, Armageddon?

1|2O I have never known a program devised by the mind of man that was not subject to human error in implementation. Nuclear weapons programs are already ticking disasters awaiting a pratfall.

Sincerely,
Albert C. Ettinger
3536 N. Nottingham St.
Arlington,, VA 22207

cc:
Senator John Warner
Representative Jim Moran
Senator Jim Webb

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Euwen, Brenda
Page 1 of 2

Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement—U.S. Department of Energy National Nuclear Security Administration

Written Comment Form
Must be received on or before April 10, 2008.

PC_950

To whom it may concern,

WHY! Please stop building bombs. The people of the world are sick of it. How will we ever reach peace if you building bombs for gods sake! Why not work on defense (offense in America's case) with a peace bomb - NO BOMBS - Be innovative, be creative, create peace - stop the same ol' policy of stopping war with war. As you see it doesn't last. Try something new, try to be a real leader, create life instead of Death. We don't want you building these Pitts! —

1|16A

2|1J

Please use other side if more space is needed.

Comment forms may be mailed to:
Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Comment forms may be faxed to:
(703) 931-9222
or sent by electronic mail to:
complextransformation@nnsa.doe.gov

You may also submit comments through the project website which can be found at:
http://www.complextransformationspeis.com

Euwen, Brenda
Page 2 of 2

There is another terrible consequence of your actions - it is the radioactive and toxic contamination waste generated by your nuclear weapon industry. your bombs are killing people around you without even having to blow them up! How would you feel if someone in your family became very ill from your radioactive waste - Would you say it was worth it? Shame on you. Shame on you for continuing to build these bombs - (especially when you don't allow it anywhere else!) How hypocritical can you be!

Sincerely,
Brenda E Euwen

Ewald, Linda
Page 1 of 2

Feb. 26, 2008

PC_175

1|1B 2|16A 3|1F 3|1F (cont) 2|16A(cont.) 4|1J 5|9B

There is a Dragon in the room that the Draft Programmatic Environmental Impact Statement on Complex Transformation ignores - the policy of the United States' government to ensure continued nuclear weapons production. At the scoping hearings for this proposal, over 33,000 comments said U.S. commitment to the Nuclear Nonproliferation Treaty requires disarmament, which Stockpile Life Extension, Reliable Replacement Warheads, and Complex Transformation violates. Still missing is an alternative that meets our ~~[illegible]~~ Nonproliferation treaty obligations by stopping nuclear weapons production and discontinuing the Stockpile Life Extension program. The four proposed alternatives all work to continue production and maintainance of nuclear weapons. These decisions send a dangerous message to the rest of the world and will provoke a new global nuclear arms race. The United States spends more than $ 40 billion dollars a year maintaining it's nuclear stockpile. ~~The~~ Proposed Complex Transformation will cost tens of billions of dollars more, while our social and infrastructure needs are unmet. Pursuing a disarmament alternative would not end work at Y-12. Full employment would be needed to dismantle the nuclear weapons backlog and safely clean up past environmental contamination, which continues to threaten the Community. This plan for Complex Transformation represents a failure to imagine a world without nuclear weapons.

Ewald, Linda
Page 2 of 2

3|1F (cont.) 4|1J (cont)

It's time to acknowledge the Dragon and honor our nonproliferation commitments by choosing an alternative that stops nuclear weapons production and dismantles the nuclear stockpile. ~~It's~~ It's time for transformative work that leads to global nuclear disarmament - starting here, in Oak Ridge, in our own country. A safer, more secure world for all is possible.

Thank-you for your time and attention.

Linda Ewald
949 Ponder Road
Knoxville, TN 37923

Faiella, Rick
Page 1 of 1

PC_1669

Levens, Matthew

From: Rick Faiella [rickfaiella@hotmail.com]
Sent: Saturday, April 05, 2008 9:43 AM
To: ComplexZ030
Subject: Manufacture of Nuclear Weapons and components

Rick Faiella
127 S. 6th St.
Warner Robins, GA 31088-4699

April 5, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

1|16A I am also opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal.

I understand that the Chemistry and Metallurgy Research Replacement (CMRR) project would be able to produce 50 to 80 plutonium pits annually, the first major nuclear warhead production since the end of the Cold War.

2|1J Building this new plant would send a contradictory message to other countries, such as Iran, who may be seeking nuclear weapons. While the U.S. is asking others to forego developing nuclear arsenals, we are simultaneously trying to increase our own capacity to build new nuclear weapons.

3|8B Congress rebuked the Energy Department's last attempts to upgrade the arsenal by defunding the Reliable Replacement Warhead and last year's proposed mega-scale bomb plant. The CMRR project is another irresponsible new program that should be rejected.

4|1J It is critically important that the U.S. stand firm on no new nuclear weapons development and/or manufacture, and take a leadership role in bringing all current nuclear weapons capable countries togetner to implement a worldwide nuclear weapons moratorium as a first step to eliminating the insidious insanity of nuclear weapons proliferation and threat to us all.

Sincerely,

Rick Faiella
478-922-2255

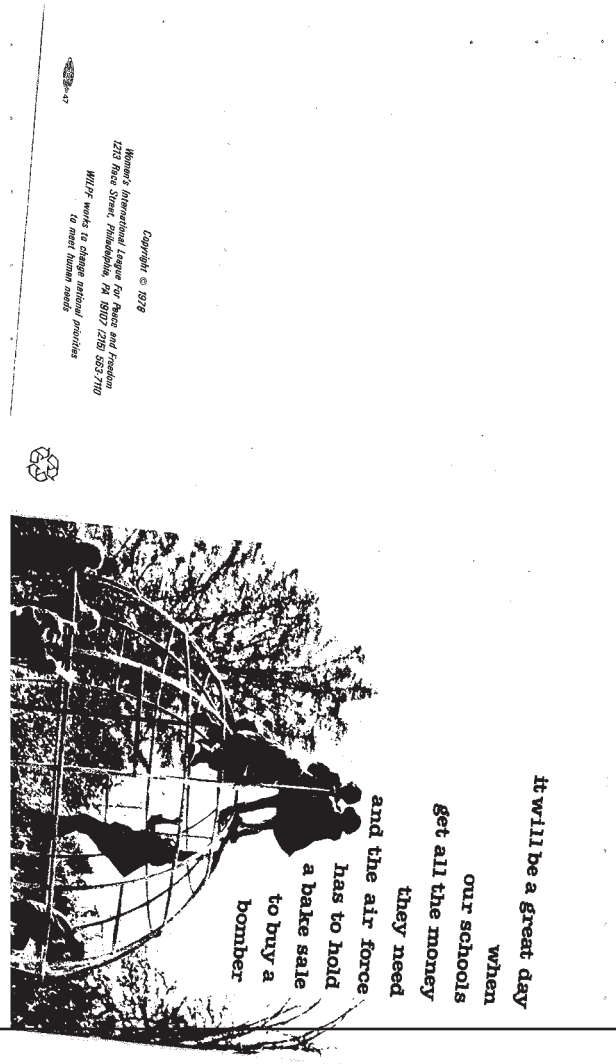
Family, Leonard
Page 1 of 2

PC_971

We have the Weapons
of Mass Destruction!
And the U.S. Nuclear
Stockpile!
No more nuclear wea-
pons period! Eliminate
what we have!!
The Leonard Family

1|16A

Family, Leonard
Page 2 of 2



Farell, Nancy
Page 1 of 1

PC_1169

Levens, Matthew

From: Nancy Lee Farrell [nfarrellvt@yahoo.com]
Sent: Thursday, April 03, 2008 8:43 PM
To: Complex2030
Subject: Nuclear bombs and plants

Nancy Lee Farrell
4005 N. 24th St.
Tacoma, WA 98406-4804

April 3, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|7J; 2|16A No more nuclear plants or weapons! We don't know what to do with the nuclear waste we already have.

Sincerely,

Nancy Lee Farrell
253-952-0571

1

Farlee, Coralie

Page 1 of 1

PC_842

Levens, Matthew

From: Coralie Farlee [cfdc13@juno.con]
Sent: Saturday, March 29, 2008 10:29AM
To: Complex2030
Subject: Stop new nukes and DOWNSIZE ALL NUKES

Coralie Farlee
389 O Street, S. W.
Washington, DC 20024-2901

March 29, 2008

Complex Transformation

Dear Complex Transformation:

1|16A I am opposed to all efforts that involve increasing or "enhancing" or "rebuilding" the U.S. nuclear arsenal.

1|16A (cont.) We should not spend any more money on developing or "enriching" nuclear weapons; all efforts should be made to ELIMINATE ALL U.S. NUCLEAR WEAPONS OR -- all we or any nation needs is ONE!

Sincerely,

Coralie Farlee
202-554-4407

Farmer, Mike

Page 1 of 1

PC_35

Office of the County Executive
P O Box 643
Kingston TN 37763
Phone: 865-376-5578 -- Fax: 865/717-4101

February 19, 2008

Mr. Ted Wyka
U. S. Department of Energy
National Nuclear Security Administration
Office of Transformation NA-10.1
1000 Independence Avenue, NW
Washington D.C. 20585

Dear Mr. Wyka:

Thank you for the opportunity to share our comments on the National Nuclear Security Administration's Complex 2030 programmatic environmental impact statement. Like others in DOE communities around the nation, we have followed the Department's pans to reduce the size and scope of the complex, while maintaining those critical capabilities needed to keep our nation secure. We have reviewed the plans you presented at your hearing in Oak Ridge in November 2006, and read the recommendation you issued in early January 2008.

1|15A 2|10I 3|5C We support the NNSA's proposed plan to maintain a uranium center of excellence for the complex in Oak Ridge, Tennessee, known as Distributed Centers of Excellence, which is the preferred alternative. This includes the safe and secure storage of special nuclear material and the work Y-12 performs in manufacturing of secondaries and cases for the NNSA.

Y-12 is, and we hope will continue to be for the next generation, a key component of the nuclear weapons complex. Known as the Fort Knox of enriched uranium, Y-12 has manufactured components of every weapon in the stockpile, and is currently recognized as the U. S. center of excellence in uranium. The Complex 2030 plan supports that ongoing mission.

1|15A (cont) 4|7NI 5|7J

- We support the transformation of the nuclear weapons complex to make it smaller, more responsive, safer and more secure.
- We support the NNSA's work to modernize the Y-12 Complex, including the completion of the special materials storage facility at Y-12, and the construction of a new uranium production facility.
- As part of this activity, we want to work with NNSA and DOE's environmental management program to finish the clean up needed on the site.

Thank you for the opportunity to comment on this matter.

Sincerely,

Mike Farmer
Roane County Executive

MF:sl

Farmer, William
Page 1 of 1

PC_472

Buenaflor, Justin

From: Farmer, William E (W7F) [farmerwe@y12.doe.gov]
Sent: Wednesday, February 20, 2008 6:07 AM
To: Complex2030
Subject: Y-12

I support UPF at Y-12. Please, I urge you for this country's safety and security be in favor of:

1|15A Distributed Centers of Excellence Alternative (NNSA Preferred Alternative) Retains the three major special nuclear material functions (plutonium, uranium and weapon assembly/disassembly) at two or three sites.
Impact to Y12: Y12 would continue as the Uranium Center of Excellence; the Highly Enriched Uranium Manufacturing Facility would be completed; and preliminary design of the Uranium Processing Facility would proceed.

Sincerely,
Will Farmer

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Farmer, William
Page 1 of 1

PC_473

Buenaflor, Justin

From: Farmer, William E (W7F) [farmerwe@y12.doe.gov]
Sent: Friday, February 08, 2008 4:36 PM
To: Complex2030
Subject: UPF

To All,

1|15A Y-12 is the Nuclear Standard Of Excellence facility in the country. We must keep the UPF project at Y-12 for our country's sake. We are the most capable facility anywhere and NNSA must commit to keeping the UPF project at Y-12.

Will Farmer

1

Fearey, Bryan
Page 1 of 1

PC_507e

Buenaflor, Delight

From: Leo [leo1943@yahoo.com]
Sent: Thursday, April 10, 2008 9:56 AM
To: DIV.Complex.Transformation
Subject: Form Post from Firefox

Last Name=Fearey
First Name=Bryan
Email Address=bfearey@comcast.net
Street Address=103 Maple Drive
City=Los Alamos
State=NM
ZIP Code=87544
Comments=The National Security of the United States is not nearly as robust as most believe. Our technological advantage in conventional forces is rapidly declining and our potential adversaries are investing heavily. Further, the US and its allies have NOT faced a meaningful adversary for over 50 years. The nuclear deterrent and its broader umbrella have ensured our freedom, and have helped to keep the world away from truly major confrontation.
Additionally, the threats we (and our allies) face are evolving, especially from rogue states, possible terrorists, and potential reemergent peer-adversaries.
1|13A
The nuclear deterrent offers and supports the ultimate guarantee of our national security.
The Complex Transformation PEIS will enable the US to continue sustaining the deterrent and ensure that it can respond to unforeseen changes in the political landscape.
Importantly, support of the PEIS will REDUCE the size of our stockpile of nuclear weapons—removing the need for a large "hedge" against failure caused by 25-year plus ages of much of the current deterrent.
I express my strong support of this PEIS and encourage the DoD, DOE, NNSA and Congress to move quickly on this to ensure my children's security, and guarantee of their enduring freedom.
1|16A

_____
Do You Yahoo!?
Tired of spam? Yahoo! Mail has the best spam protection around http://mail.yahoo.com

Feinberg, Diane
Page 1 of 1

PC_850

Levens, Matthew

From: Diane Feinberg [difein90@bellsouth.net]
Sent: Thursday, March 27, 2008 9:26 AM
To: Complex2030
Subject: RE: NUCLEAR WEAPONS/ WASTE

To: Mr. T. Wyka

The Complex Transformation proposal reflects outdated
1|16A thinking. The USA must get back on the track to
pursuing a nuclear weapons-free world by adopting
2|1F a new nuclear nonproliferation strategy.

3|1C Secondly, DOE is putting forth this proposal in the absence of a plan for re-examining the current role or quantity of these weapons.

4|7J Thirdly, DOE's main goal should be cleaning up the huge current nuclear waste instead of increasing it.

Feingold, Russ

Page 1 of 1

PC_1068

News From:

U.S. Senator Russ Feingold

506 Hart Senate Office Building
Washington, D.C. 20510-4904
(202) 224-5323

http://www.senate.gov/~feingold

STATEMENT of
U.S Senator Russ Feingold
February 16, 2008
Wisconsin State Capitol

1|1F 2|1C We must aggressively work to reinvigorate the global non-proliferation regime. In an age of nuclear terrorism, this is more important than ever. As one of the two countries with the most nuclear weapons, we must fulfill our commitments under the Nuclear Nonproliferation Treaty if we expect other nations to forgo nuclear weapons. Toward that end, last year, I cosponsored legislation prohibiting the development of new nuclear warheads until the next president prepares a comprehensive study of our nuclear posture. I also continue to lead an effort in the Senate to oppose the reprocessing of nuclear waste in the United States.

1600 Aspen Commons
Middleton, WI 53562
(608) 828-1200

517 E. Wisconsin Ave.
Milwaukee, WI 53202
(414) 276-7282

First Star Plaza
401 5th St., Room 410
Wausau, WI 54403
(715) 848-5660

425 State St., Room 232
La Crosse, WI 54603
(608) 782-5585

1640 Main Street
Green Bay, WI 54302
(920) 465-7508

washington, DC

Ferguson, Vicki

Page 1 of 1

PC_1880

Levens, Matthew

From: Vicki Lynn Ferguson [vickilynnferguson@yahoo.com]
Sent: Friday, March 28, 2008 3:36 PM
To: Complex2030
Subject: Enforce non-proliferation

Vicki Lynn Ferguson
7117 Garland Ave
Takoma Park, MD 20912-6421

March 28, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

As a resident of Takoma Park, MD I have always been proud of the fact that our town council has passed a resolution declaring it a nuclear free zone. Many laugh at the thought and yet ignore the fact that it represents an entire city's commitment to the elimination of the nuclear threat worldwide.

1|16A We believe in the non-proliferation policy and feel that it must be enforced in the US as well as the rest of the world.

I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

I am also opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal.

2|8A Congress rebuked the Energy Department's last attempts to upgrade the arsenal by defunding the Reliable Replacement Warhead and last year's proposed mega-scale bomb plant. The CMRR project is another irresponsible new program that should be rejected.

1|16A (cont.) Please work with all of your colleagues to make sure that there is no possibility for the US to fund or build or trade or store new nuclear weapons, and that we rapidly disarm and destroy those remaining in the arsenal.

There is no situation in which they should ever be used!

Sincerely,

Vicki Lynn Ferguson, MAA, CMT

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Ferran, Michelle

Page 1 of 1

PC_886

Buenaflor, Delight

From: Michelle Ferran [mferran@lanl.gov]
Sent: Tuesday, April 01, 2008 7:12 PM
To: DIV.Complex.Transformation
Subject: Form posted from Windows Internet Explorer.

Last Name=Ferran
First Name=Michelle
Email Address=mferran@lanl.gov
Street Address=320 State Road 399
City=Espanola
State=NM
ZIP Code=87532
Comments=I was unable to attend the meeting in Espanola recently, but am in favor of continuing the transformation of the nation's nuclear weapons complex (Complex. I feel that there is a need to maintain our nuclear weapon capability and support the work at Los Alamos National Labs.

1|15A

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Ferrell, William

Page 1 of 1

PC_2145

Levens, Matthew

From: William R Ferrell [wferrell@dakotacom.net]
Sent: Wednesday, April 30, 2008 12:37 AM
To: Complex2030
Subject: New facilities for nuclear weapons

William R Ferrell
4091 E Third St
Tucson, AZ 85711-1901

April 30, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|20 The president has requested that congress fund new facilities for nuclear weapons triggers and related nuclear weapons work.

I'm a retired Engineering Professor in Tucson Arizona who has served on the University of Arizona's reactor commitee. I follow developments in nuclear weapons and nuclear power.

2|13A 3|1J 4|9B 3|1J (cont) To fund the President's request is absolutely contrary to the best interests of the United States and its security. 1. It makes it harder to argue that other nations should not pursue nuclear weapons. 2. It makes the use of nuclear weapons more likely. 3. It puts more plutonium into circulation and at risk for misappropriation. 4. It spends a huge amount of money with no constructive result or economic leverage. 5. It will encourage other nuclear armed nations to pursue similar policies.

Please lobby and vote against this request.

Thank you,

William R Ferrell
520-795-3166

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Ferris, Frank

Page 1 of 1

PC_1668

Levens, Matthew

From: rdusnill@pacbell.net
Sent: Saturday, April 05, 2008 6:36 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|16A Department of Energy plans to reduce facilities related to nuclear weaponry are on the right track.
The need now is to phase out the capability to design new weapons. What is important is to lead the way for the elimination of nuclear weaponry worldwide, not to drive its proliferation.

Any scenario involving the use of nuclear weapons is a doomsday scenario. Thus, any program to develop improved weapons is insane.

The DOE should focus on shrinking the nuclear weapons complex and on maintaining the safety of our existing weapons while we dispose of them.

I ask that you include my comment as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project.
Thank you.

Sincerely,
Frank Ferris
675 Robinson Road
Sebastopol, CA 95472

cc:
Senator Dianne Feinstein
Senator Barbara Boxer
Representative Lynn Woolsey

1

Ferris, Kathleen

Page 1 of 1

PC_2023

Levens, Matthew

From: k.r.ferris@comcast.net
Sent: Wednesday, April 30, 2008 10:5I PM
To: Complex2030
Subject: production of nuclear weapons

1|16A No more nuclear weapons, no more nuclear waste. We have more to fear from our weapons than from any enemy.

Kathleen Ferris
3210 E. Compton Rd.
Murfreesboro, TN 37130

Fessenden, Peter
Page 1 of 1

PC_ 507a

Buenaflor, Delight

From: Peter Fessenden [fess33@comcast.net]
Sent: Friday, May 02, 2008 5:23 PM
To: Complex2030
Subject: comment on Complex Transformation

1|9B It is imperitive that the planned escalation of nuclear triggers at Los Alamos be scaled back, and that the attention at Los Alamos to alternative energy research be GREATLY scaled up. The world will profit much more by this change than without it.

Thank you,
Peter Fessenden, PhD
(former Los Alamos employee)

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Fickinger, William
Page 1 of 1

PC_1566

Levens, Matthew

From: William Fickinger [wjf@cwru.edu]
Sent: Tuesday, April 15, 2008 5:16 PM
To: Complex2030
Subject: new nuclear weapons

William Fickinger
12900 Lake Av
Lakewood, OH 44107-1577

April 15, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A We do not need new facilities to build new nukes. We do need to continue to reduce the numbers of warheads and to secure those that remain. In additiion, the idea of building new nuclear weapons to replace the ones we already have is wrong for several reasons: The scientific and engineering community have determined that the current warheads are good for another hundred years. It is most probable that the new 2|1E designs will require tests, putting the CTBT into the trash. It will certainly encourage China and Russia to emulate the US, and to upgrade their defenses. It flies in the face of efforts to get rid of nuclear weapons (i.e. highly enriched uraniuim and plutonium) 3|1J completely.

Sincerely,

William Fickinger
216 226 9446

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Finch, Eugene
Page 1 of 1

PC_545

Buenaflor, Delight

From: Eugene Finch [efinch@valornet.com]
Sent: Saturday, March 08, 2008 1:41 PM
To: DIV.Complex.Transformation
Subject: Form posted from Windows Internet Explorer.

Last Name=Finch
First Name=Eugene
Email Address=eugene@valornet.com
Street Address=County Rd 16 #41
City=Espanola
State=NM
ZIP Code=87532
Comments=I support the NNSA preferred alternative for LANL being the site for plutonium research and pit manufacturing, and other areas of research. I support the LANL mission and and the research that takes place there. LANL is a very important asset to the nation and to the economy of northjern New Mexico.

1|15A

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Finch, Helen
Page 1 of 1

PC_594

Buenaflor, Delight

From: Eugene Finch [efinch@valornet.com]
Sent: Saturday, March 08, 2008 1:44 PM
To: DIV.Complex.Transformation
Subject: Form posted from Windows Internet Explorer.

Last Name=Finch
First Name=Helen
Email Address=eugene@valornet.com
Street Address=P.O. Box 1083
City=Espanola
State=NM
ZIP Code=87532
Comments=I support the NNSA preferred alternative proposed mission for LANL. I believe the LANL mission is extremely important to the nation, and LANL is extremely important for economic vitality of northern New Mexico.

1|15A

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Finch, Warren
Page 1 of 1

PC_508

Buenaflor, Delight

From: WARREN FINCH [wfinch@valornet.com]
Sent: Tuesday, February 19, 2008 8:21 PM
To: DIV.Complex.Transformation
Subject: Form posted from Windows Internet Explorer.

Last Name=Finch
First Name=Warren
Email Address=wfinch@valornet.com
Street Address=County Rd. 16 #37
City=Espanola
State=NM
ZIP Code=87532
Comments=I support the NNSA proposed preferred alternative site of LANL for the site for actinide research and pit manufacturing. LANL's research and science capabilities, and past performance, prove that it is the best choice for the missions outlined by NNSA in the SPEIS.

1|15A

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Finklea, Bryson
Page 1 of 1

PC_316

Theodore Wyka
Complex Transformation SPEIS Document Mgr
US Dept of Energy
1000 Independence Ave
Washington, DC 20585

1/27/08

Bryson Finklea
128 Redfield Rd
Mocksville, NC 27028

To whom it may concern:

1|16H I am writing about the NNSA plan for Complex Transformation. I am opposed to this plan at Oak Ridge for a couple of reasons.

2|14O First, I am concerned over the possible Immense destruction to people and the environment from the use of the nuclear weapons or from

3|7F the accidents that could happen from having them around.

4|9B Second, I believe this money could be better spent ___ in our schools, universities, and hospitals, as well as in foreign programs, such as building up health care infastructure around the world, that would prevent future military conflict.

Thank you.

Sincerely,

Bryson W. Finklea

Finney, L. Eleanor
Page 1 of 1

PC_1785

Levens, Matthew

From: L. Eleanor Finney [lefinney@cox.net]
Sent: Friday, March 28, 2008 10:07 PM
To: Complex2030
Subject: Stop new nukes

L. Eleanor Finney
29571 Via Alto Cerro
laguna Niguel,, CA 92677-1811

March 28, 2008

Complex Transformation

Dear Complex Transformation:

1|16A I am opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal.

2|1J We should spend the billions proposed for this plan on programs to eliminate nucleaer weapons.

3|2O I was born in the midwest, moved to Arizona and have lived in California since 1948 (60 years). In College I wrote one of my papers on the TVA. I have followed this issue all my life. Nuclear proliferation is not the way to go. Our country should be the leader in uniting with the other countries of the world to eliminate nuclear proliferation.

1|16A (cont) I encourage my government to follow the five strategies toward universal compliance recommended by a 2005 Carnegie Endowment for International Security report. Those five strategies are to 1) make sure there are no new nuclear weapon states; 2) secure all nuclear materials; 3) stop illegal transfers; 4) devalue the political and military currency of nuclear weapons; and 5) commit to conflict resolution.

2|1J (cont) I believe my government should be setting the goal of a world free of nuclear weapons and working energetically on the actions required to achieve that goal and that it should be a priority of our foreign policy.

4|14O Additionally there is still no safe disposal of any nuclear waste. We should be subsidizing and developing all forms of alternative energy and practicing energy conservation.

Sincerely,

L. Eleanor Finney

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First, Nancy
Page 1 of 1

PC_1907

Levens, Matthew

From: Nancy First [nancy.first@comcast.net]
Sent: Wednesday, February 20, 2008 11:53 AM
To: Complex2030
Subject: No more nuclear weapons

Nancy First
77 hawthorn lane
northampton, MA 01060-1097

February 20, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

I am very upset to hear that the Administration is attempting to begin building another NEW nuclear weapons program. This is really insane.

1|14O 2| 14M3 There are no ways yet developed that would take care of the waste coming out of such places. The quality of the air, the water, and human life is so challenged as to make such a step beyond the pale.

Please take part in saying NO to any such development. You are the one in position to take such action and I am counting on you to stand up and make your decision against such action heard.

Thank you,

For the safety of the world

Nancy G.B. First
413-584-5190

1

Fischer, Cynthia

Page 1 of 1

PC_1732

Levens, Matthew

From: Cynthia Knuth Fischer [cknuth@aol.com]
Sent: Sunday, March 30, 2008 6:11 PM
To: Complex2030
Subject: Cancel plutonium pits for nuclear weapons

Cynthia Knuth Fischer
956 Conner Road
West Chester, PA 19380-1810

March 30, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

2|1J Building this new plant would send a contradictory message to countries such as Iran and North Korea.

3|9A We should use the money to take
our nuclear weapons off high alert
and bring their number down to
10,000 or less. Even that number could destroy all life on earth, could it not?

Sincerely,

Cynthia Knuth Fischer
610-696-1324

1

Fischer, Richard

Page 1 of 1

PC_1513

Levens, Matthew

From: Richard Fischer [gwyllum@netins.net]
Sent: Monday, January 28, 2008 1:18 PM
To: Complex2030
Subject: Public Comment on Complex Transformation

Dear Complex Transformation;

I appreciate the overall goal of reducing our nuclear stockpile to a quarter of our 1960s level. Let's take the next step and reduce it and the world's nuclear weapons to zero.

1|16A As I read through your website, I was troubled by the privatization of the nuclear weapons industry by establishing the Watts Bar Nuclear Generating Station Complex as the producer or extractor of tritium.

1|16A (cont) Second I am troubled by the creation of either modified or new generation of nuclear weapons especially by the combining of the Livermore model with the Los Alamos model to create a new type and class of weapon.

The world needs less not more nuclear weapons. We need to eliminate those we have, which will last well into the 2070s or beyond.

2|1J A nation can not continually live on the fear of what others may do in the future. We need to direct our resources and energy and creative thinking towards living in a world where the threat of weapons is not the reason we do or don't do something, but rather we act because it is the right thing to do for the planet and all of its inhabitants. To do this we must build trust, respect, and confidence in our dealings with the world. Upgrading our nuclear arsenal does not do this.

If you need to consolidate the facilities to dismantle our existing stockpile of nuclear weapons, do so. If it is to continue making new weapons, please do not do so.

3|1N As the Watts Bar Nuclear Generating Station Complex shows, there is a direct connection between nuclear energy and weapons. Why not put our energy into creating safe, clean, renewable energy that does not tempt us to make weapons.

Please stop making weapons. Please reduce our stockpile to zero weapons and help the rest of the world, Israel in particular, to reduce their stockpiles to zero.

Thank you.

Sincerely,

Richard J. Fischer
656 Molony Road
Bernard IA 52032-9715

1

Fishelman, Stuart

Page 1 of 1

PC_1850

Levens, Matthew

From: s.fishelman88@comcast.net
Sent: Sunday, April 06, 2008 10:13 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

I am concerned about our nation's stockpile of older and newer atomic weapons.

I am against action that increases our nuclear weapons.

1|16A We do not need to make more nuclear weapons.

I am in favor of taking steps to appropriately eliminate atomic weapons.

"Complex Transformation" is not needed.

2|1J "Complex Transformation" undermines U.S. efforts to stop the spread of nuclear weapons around the world.

I ask that you include my comment as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project.
Thank you.

Sincerely,
Stuart Fishelman
823 E. Belvedere Ave,
Baltimore, MD 21212

cc:
Senator Barbara Mikulski
Senator Benjamin Cardin
Representative Dutch Ruppersberger

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Fisher, Homer

Page 1 of 2

PC_171

RESOLUTION

WHEREAS, B&W Y-12 operates the National Nuclear Security Administration's (NNSA) Y-12 National Security Complex (Y-12) located in Oak Ridge, Tennessee; and

WHEREAS, Y-12 is a premier manufacturing facility dedicated to making the nation and world a safer place, and as such plays a vital role within the national Nuclear Weapons Complex; and

WHEREAS, the NNSA is evaluating options to transform the Nuclear Weapons Complex to become more efficient and cost-effective and meeting the National Security needs of the 21st Century; and

WHEREAS, the NNSA has issued the document entitled *The Draft Transformation Supplemental Programmatic Environmental Impact Statement (SPEIS)*; and

WHEREAS, the NNSA's preferred alternative as described in the SPEIS is to establish *Distributed Centers of Excellence*, which would support the continued uranium mission at Y-12, and facilitate the design of a new Uranium Processing Facility; and

WHEREAS, NNSA and B&W Y-12 have undertaken an aggressive modernization program at Y-12 designed to help secure the facility's capabilities well into the 21st Century; and

WHEREAS, B&W Y-12 has established a Community Relations Council (CRC) comprised of civic and community leaders, local residents, and environmental interests; and

WHEREAS, Y-12 has a significant economic impact on the region, with almost 7000 employees and subcontractors, and procurements worth millions of dollars annually; and

WHEREAS, the expertise of the highly skilled Y-12 workforce cannot be duplicated anywhere in the world; and

WHEREAS, B&W Y-12 is a valued member of Oak Ridge's business community and has donated numerous resources throughout the region in the form of time, talent and financial assistance; and

WHEREAS, the purpose of the CRC is to facilitate communications and involvement with the greater Oak Ridge region regarding issues related to B&W Y-12; and

WHEREAS, CRC members are volunteers who serve B&W Y-12 in an advisory capacity; and

WHEREAS, the CRC desires to comment on the SPEIS.

NOW, THEREFORE, BE IT RESOLVED BY THE B&W Y-12 COMMUNITY RELATIONS COUNCIL:

1|5C
2|5C.4
3|7N That the Community Relations Council strongly supports, and urges NNSA to implement, NNSA's preferred alternative, *The Distributed Centers of Excellence*, which would support the continued uranium mission at Y-12, and facilitate the design of a new Uranium Processing Facility.

4|15A BE IT FURTHER RESOLVED that this resolution be transmitted to the NNSA and B&W Y-12 as the official comments of the CRC in support of *The Draft Transformation Supplemental Programmatic Environmental Impact Statement (SPEIS)*.

This the 22nd day of February 2008.

APPROVED:

Homer Fisher
Chair
B&W Y-12 Community Relations Council

Fisher, Homer
Page 2 of 2

The B & W Y-12 Community Relations Council is comprised of 22 dedicated individuals who have volunteered to facilitate greater information exchange between Y-12 and the communities in and around Oak Ridge, Tennessee. Members have made a commitment to listen, learn and voice their unique perspective for the mutual benefit of Y-12 and its East Tennessee neighbors.

Name - Affiliation and Postal Addresses of the 21 B&W Y-12 CRC members available and voting unanimously in favor of adopting the attached resolution are:

Gina Broome – Elected Official Representative District Director, Congressman Zach Wamp's Office Federal Building, 200 Administration Road Oak Ridge, TN 37830	**Ken Green – Oak Ridge Schools** P.O. Box 6588 Oak Ridge, TN 37831
Katy Brown- **Oak Ridge Convention & Visitors Bureau** 102 Robertsville Road, Suite C Oak Ridge, TN 37830	**Tyler Johnson – Environmentalist** B&W Clinch River 767 Boeing Road Oak Ridge, TN 37830
Rick Chinn - Commercial Realtor R & R Properties 575 Oak Ridge Turnpike, Suite 201 Oak Ridge, TN 37830	**Steve Jones – City of Clinton** Clinton City Manager 100 N. Bowling St. Clinton, TN 37716
Shirley Cox - Y-12 Retiree 111 Woodward View Rd Clinton, TN 37830	**Jan McNally – Medical Community** 94 Royal Troon Oak Ridge, TN 37830
Mike Cuddy – Business Leader SAIC, 301 Laboratory Rd. Oak Ridge, TN 37830	**Susana Navarro-Valenti – Business Leader** Navarro Research 669 Emory Valley Road Oak Ridge, TN 37830
Allen Edwards, President **Pellissippi State Technical Community College** 10915 Hardin Valley Rd. Knoxville, TN 37933-0900	**Greta Ownby – Business Leader** Oak Ridge Chamber of Commerce 1400 Oak Ridge Turnpike Oak Ridge, TN 37830
Honorable Mike Farmer, Mayor **Roane County** P. O. Box 643 Kingston, TN 37763	**Greg Rudy – Business Leadeer** Haselwood 1009 Commerce Park, Suites A & B Oak Ridge, TN 37830
Homer Fisher – Business Leader/CRC Chair University of Tennessee 1201 Oak Ridge Turnpike, Suite 100 Oak Ridge, TN 37830	**Tom Tuck – Near Business Neighbor** TN Bank 401 S. Illinois Avenue Oak Ridge, TN 37830
Amy Fitzgerald – City of Oak Ridge P.O. Box 1 Oak Ridge, TN 37831-0001	**Anita Vines – Realtor** P.O. Box 1270 Norris, TN 37287
Glen Galen – Near Neighbor/Westwood Community Bechtel Jacobs Company P.O. Box 4699 Oak Ridge, TN 37831-7234	**Tim Waddell – Near Business Neighbor** Manufacturing Sciences Corporation 804 S. Illinois Avenue Oak Ridge, TN 37830
Willie Golden – Near Neighbor/Scarboro Community 204 Tusculum Dr. Oak Ridge, TN 37830	

Fisher, Rita
Page 1 of 1

PC_1846

Levens, Matthew

From: Rita Fisher [rfisher@ihmsisters.org]
Sent: Friday, April 04, 2008 11:02 AM
To: Complex2030
Subject: funding for nuclear weapons plant

Rita Fisher
150 Bur Oak Ct.
Monroe, MI 48162-3383

April 4, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

16A The world and its peoples do not need more nuclear weapons, nor the threat of them. As a human being who has seen the the effects of nuclear power - both bombs and accidents - I strongly oppose the idea of and any plans for the proposed building of a plant to produce plutonium pits for nuclear weapons.

No more nuclear weapons in the USA!

Sincerely,

Rita M. Fisher

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Fleck, Martin
Page 1 of 1

PC_119

CAMPAIGN FOR A
nuclear weapons free world

Testimony on Complex Transformation

By Martin Fleck, Coordinator
Campaign for a Nuclear Weapons Free World
DOE / NNSA Complex Transformation Public Hearing, February 21, 2008
North Augusta, South Carolina

I'm Martin Fleck, Coordinator of the Campaign for a Nuclear Weapons Free World. We appreciate that the National Nuclear Security Administration is holding hearings so that the public may express opinions on Complex Transformation.

The Campaign for a Nuclear Weapons Free World is a consortium of 60 organizations advocating practical steps to eliminate the nuclear threat. We work to stop the spread of nuclear weapons, end the pursuit of new warheads, and ensure that existing stockpiles are verifiably dismantled.

1|13A.1 The Complex Transformation plan takes a short-sighted approach to our security – and assumes that the United States will need to maintain and upgrade nuclear weapons arsenals indefinitely. In contrast, momentum is building behind a broad, bipartisan consensus that it is **in the security interests of the United States** to pursue a nuclear weapons-free world.

2|1F
3|1E Through the 1968 nuclear Nonproliferation Treaty, the United States has committed to implement deeper, verifiable, and irreversible nuclear weapons reductions and to support the Comprehensive Nuclear Test Ban Treaty. Failure to fulfill these obligations and renounce new warhead production erodes confidence that the nuclear-weapon states intend to fulfill their NPT commitments and complicates efforts to repair the beleaguered nonproliferation system. It is very appropriate to be concerned about North Korea and Iran, but as Dr. Mohamed ElBaradei, Director General of the International Atomic Energy Agency, has said, "It's hard to tell people not to smoke when you have a cigarette dangling from your mouth."

4|1J

4|1J (cont)
3|1E (cont.) The United States can lead by example. We call upon the United States to:

- Undertake a comprehensive re-examination of the role of nuclear weapons in U.S. security strategy
- Renounce the development of new nuclear weapons
- Ratify the Comprehensive Test Ban Treaty
- Achieve dramatically deeper reductions in U.S. and Russian nuclear and missile stockpiles
- Engage other countries in negotiations to reach zero nuclear weapons

Thank you.

322 4th St., NE, Washington, D.C. 20002 • 202.544.0217, ext 182
www.nuclearweaponsfree.org

Flom, Michelle
Page 1 of 1

PC_658

Levens, Matthew

From: Michele Flom [micheleflom@yahoo.com]
Sent: Wednesday, February 20, 2008 2:37 AM
To: Complex2030
Subject: production of new nuclear weapons

Michele Flom
261 Hermosa Way
San Luis Obispo, CA 93405-1511

February 20, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|1J How is it that while our government asks other countries to refrain from developing any nuclear facilities-- certainly facilities capable of delivering nuclear weapons, they somehow feel entitled to gear up for a new generation of nuclear warheads?

This thinking is either absurd or arrogant.

2|16A Enough already. Count me as one more red-blooded tax paying American who opposes any new production of nuclear weapons on our shores.

Sincerely,

Michele Flom

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Flom, Michelle

Page 1 of 1

PC_1818

Levens, Matthew

From: Michele Flom [micheleflom@yahoo.com]
Sent: Friday, March 28, 2008 2:07 AM
To: Complex2030
Subject: Adding to the nuclear arsenal

Michele Flom
261 Hermosa Way
San Luis Obispo, CA 93405-1511

March 28, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

To whom it may concern,

1|16A From someone who is gravely concerned-- I am a mother writing to express my dismay at the prospect of our country restarting its nuclear weapon program. I had hoped that the development of a new generation of nuclear weapons was a nightmare put to rest, for we all know their potential for destruction. Surely such a resurrection will send the wrong message to the entire world--and particularly to those unstable nations who we already see as a threat.

Thoroughly search your hearts and minds
to determine what course of action will do the least harm to this world.
Think of the children first.

Sincerely,

Michele Flom

Sincerely,

Michele Flom
(805) 788-0837

1

Florsheim, Nancy

Page 1 of 1

PC_2072

Levens, Matthew

From: Nancy Florsheim [npf@weycogroup.com]
Sent: Thursday, April 10, 2008 6:46 PM
To: Complex2030
Subject: RE: LANL

Nancy Florsheim
npf@weycogroup.com

-----Original Message-----
From: Nancy Florsheim [mailto:npf@weycogroup.com]
Sent: Wednesday, April 09, 2008 1:45 PM
To: complextransformation@nnsa.doe.govLANL
Subject: LANL

1|16A
2|10B I oppose expanded nuclear pit production at LANL. It is unnecessary, likely to further the arms race, and bad for our NM environment.
Nancy Florsheim
npf@weycogroup.com

1

Folks, Karen
Page 1 of 1

PC_1121

Levens, Matthew

From: Karen Folks [folks1@llnl.gov]
Sent: Tuesday, April 01, 2008 5:24 PM
To: Complex2030
Subject: Comment on Complex Transformation PEIS

Under Hydrodynamic Testing

Close CFF at LLNL in approximately 2015, which could enable transfer or closure of Site 300.

1|11D If the closure or transfer of Site 300 is visioned to be part of the preferred alternative, then this PEIS should evaluate the impacts of this closure. In the summary tables, there are no evaluations of impacts for any LLNL facility. This EIS should evaluate impacts to the environment when operations requiring controlled burns are discontinued. This will be an adverse impact to native flora and possibly associated fauna that thrive partly because of the burn frequency that are driven by operations.

2|14H Also, impacts to cultural resources should be evaluated if historically significant facilities are to be closed and especially if the closure of Site 300 envisions demolition of facilities rather than restoration and preservation.

3|10C There are probably other impacts that should be evaluated with the closure of the facility. Not handling the impacts of the closure or transfer of Site 300 within this PEIS seems like it would be project segregation since the PEIS implies the preferred choice would trigger this action.

1

Folks, Karen
Page 1 of 1

PC_1122

Levens, Matthew

From: Karen Folks [folks1@llnl.gov]
Sent: Tuesday, April 01, 2008 3:23 PM
To: Complex2030
Subject: Comment on Draft PEIS Complex Transformation

The preferred alternative under Hydrodynamic Testing states

"Cease open air hydrotesting at LANL and LLNL in 2009; close CFF at LLNL in 2015; plan for DARHT replacement at NTS in 2025 - time frame."

1|10C There is a contradiction here. CFF is the only truly enclosed explosives facility designed to contain hydrodynamic testing. DARHT, though taking some mitigations for
2|10D emissions, is still an outdoor facility. Discontinuing open air hydrotesting would imply that outdoor hydrotests at DARHT would also be discontinued, which means no hydrotests
3|7N could occur after the closure of CFF in 2015.

3|7N (cont) Also, planing on replacing DARHT in the 2025 timeframe is pretty vague. Is the plan to cease shots at DARHT in 2025 or just complete the planning for the replacement of DARHT.

2|10D (cont) Finally, by replacing DARHT and not the combined capabilities within DARHT and CFF, the Complex has lost valuable diagnostic capabilities unique to CFF and not repeated in DARHT. For instance, CFF can at one time collect an array of data (beyond what is captured from the FXR), while data collected at DARHT is more limited. In addition, by being truly contained, CFF provides capabilities for a more controlled environment during a shot than does DARHT and can essentially eliminate all emissions from the test through filters and air scrubbers.

4|6D The preferred alternative should be a single new facility that would replace the capabilities of both DARHT and CFF and would not close DARHT or CFF until these
3|7N (cont) capabilities were in place. Also, if hydrotesting is envisioned to continue at DARHT, then the language on closing open air hydrotests needs to exclude DARHT.

1

Folsom, Tyler
Page 1 of 1

PC_774

Levens, Matthew

From: Tyler Folsom [tfolsom@scn.org]
Sent: Wednesday, January 16, 2008 12:52 PM
To: Complex2030
Subject: Comments on SPEIS

Mr. Wyka:

1|9H 2|1F Spending DOE resources on nuclear weapons is a poor choice. There are no plausible targets for US nuclear "weapons". The nuclear proliferation treaty requires the US to reduce its nuclear stockpile. If we are serious about reducing the threat of terrorism, the US will work vigorously to bring about a world with no nuclear bombs.

3|9B DOE resources would be much better spent on non-fossil power technologies such as wind, geothermal, solar and nuclear.

Tyler Folsom, Ph.D, P.E.

Tyler Folsom
5805 16th Ave NE
Seattle, WA 98105

1

Ford, Charles
Page 1 of 1

PC_139

Mr. Theodore Wyka, Office of Transformation
U.S. Dept. of Energy, Washington, DC Feb. 26, 2008

Dear Mr. Wyka,

1|5C1 2|16A 3|1J 4|13A1 5|1F It seems to me there should be no reason at all to have to attend such a meeting and make such a comment. We already have enough nuclear weapons to destroy the whole world at least nine times, if not ninety times, and the experts have examined them and certified them good for at least another thirty years. If we upgrade our weapons, build a new plant and build new nuclear weapons parts, other nations will certainly follow and increase the number of nukes and make it easier for terrorists to attain some. If terrorists are so driven by rage and frustration that they blow themselves and others up, they might be insane enough to blow up the whole world, because one nuke going up would almost certainly call out nuclear response. Building a new bomb plant at Oak Ridge would break the non-proliferation treaty we signed.

6|9B 7|7J The only real reason I can see for this Chemistry and Metallurgy Research Replacement nuclear facility is that it would maintain high-paying jobs for Oak Ridge residents and for D.O.D. officials like yourself. If the U.S. would reduce its nuclear weapons and clean up the plants it could provide just as many jobs at the same salaries and be contributing to security and peace rather than reducing our security and that of the whole world.

Charles Lord, P.O. Box 464, Pleasant Hill, TN 38578

Charles Ford

and to make profit for multinational corporations.

Ford, Ian
Page 1 of 1

PC_504

Buenaflor, Justin

From: Ian Ford [ilf@ianford.com]
Sent: Monday, March 03, 2008 10:08 AM
To: Complex2030
Subject: new nuclear pits

Ian Ford
3110 9th NW
Albuquerque, NM 87107-1109

March 3, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A; 2|1J I oppose increasing the capacity to build new nuclear weapons, for reasons of national and international security. A good way to keep other states from investing in new weapons is to remove threats against them. Instead, US policy has been to keep a wide lead in the arms race, which gives reasons for other states to develop new weapons. I feel LESS safe in a world with one superpower.

Sincerely,

Ian Ford
505 246 8490

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Foreman, Shelagh
Page 1 of 1

PC_2107

Levens, Matthew

From: Shelagh Foreman [shelagh77@verizon.net]
Sent: Wednesday, April 30, 2008 12:02 AM
To: Complex2030
Subject: No to Complex Transformation

Theodore A.Wyka
Complex Transformation SPEIS Document Manager

Dear Mr. Wyka:

1|16A 2|1F; 3|1J By now you have probably seen more than enough thoughtful reasons why it is a bad mistake to continue the Complex Transformation program. My own particular concern is one of nuclear proliferation and foreign policy.
How can the US hope to convince other countries not to pursue nuclear programs if we violate our treaty obligations to the Nuclear Non-Proliferation Treaty. Instead of making serious cuts to the the US nuclear arsenal, as article VI of the Treaty specifies, this program (under whatever name), embodies a plan to build a new generation of nuclear weapons, a clear violation of Article VI and the intent of the Treaty.

Perhaps the nuclear labs could concentrate their efforts on ways to detoxify and use nuclear waste.

1|16A (cont) Thank you for registering my opposition to Complex Transformation.

Respectfully,

Shelagh Foreman
27 Stone Wall Lane
Falmouth, MA 02540

1

Foster, M. Caritas

Page 1 of 1

PC_1295

Levens, Matthew

From: Caritas Foster [caritas@sbcglobal.net]
Sent: Friday, March 14, 2008 12:58 PM
To: Complex2030
Subject: Not in favor of expansing the U.S.'s nuclear weapons program.

Caritas Foster
3355 Pennsylvania Avenue #44
Fremont, CA 94536-6312

March 14, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

I am a Catholic religious sister and live in Fremont, California.

1|16A I strongly oppose the building of new nuclear weapons and anything related to expanding the United States nuclear arsenal.

2|1J As we are asking other countries not to continue working toward nuclear weapons, it seems hypercritical for the United States to do so.

Nuclear weapons will not bring peace nor stability to our planet.

3|16A For the sake of our fragile planet and its peoples I ask that not support funding to restart our weapon program.

Sincerely,

M. Caritas Foster
510-742-1268

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Foster, Sandra

Page 1 of 1

Page 1 of 1

PC_1102

Levens, Matthew

From: jimsandy foster [jimsandyfoster@yahoo.com]
Sent: Tuesday, April 01, 2008 10:08 PM
To: Complex2030
Subject: Fwd. My Voice--No New Weapons

Dear Milie

The address below did not work for me.

jimsandy foster <jimsandyfoster@yahoo.com> wroe:

Date: Tue, 1 Apr 2008 18:36:48 -0700 (PDT)
From: jimsandy foster <jimsandyfoster@yahoo.com>
Subject: My Voice--No New Weapons
To: www.complextransformation@nnsa.doe.gov

Mr. Theodore Wyka
Complex Transformation SPEIS Document Mgr.
U. S. Department of Energy
1000 Independence Avenue, SW
Washington, D. C. 20582

Dear Mr. Wyka

1|16A I write as a citizen and from the conviction that nuclear weapons of all kinds need to be dismantled and that no new weapons should be produced. I say this in full awareness that others might choose to use them against us, but I cannot believe there is *any justification* for our using them against anyone else.

Surely if the same efforts were made for peace that are made for death, there could be some steps forward in re-claiming our humanity. Life has to mean more than a functioning physical body. Life has to mean being able to respect our very own selves.

2|1F Please cease production of nuclear weasons. Please dismantle and dispose of our nuclear weapons and parts. As a minimum first step I ask that our United States honor the Nuclear Nonproliferation Treaty. There is no end to the nuclear weapons arms race except death for all people of all nations. If we are "the world's only superpower", I find that meaningless if we are not leading from morality and ethics.

Thank you

Sincerely
Sandra S. Foster

5/15/2008

Frame, Robert

Page 1 of 1

PC_1515

Levens, Matthew

From: robertframe@hotmail.com
Sent: Tuesday, April 08, 2008 6:31 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

A good idea and a very bad idea:
1|15A Good of DoE to plan to consolidate and reduce the redundant capabilities within the nation's sprawling nuclear weapons complex.

2|3A However, very very bad to focus on an unnecessary capability to research, develop, and manufacture new types of nuclear weapons when our nation already has many thousands of nuclear weapons.
We do not need the capability to make more or newer nuclear weapons.

The DoE should focus on drastically lessening the number of such weapons while maintaining their safety and security of our existing arsenal. However, there focus going forward should be on reducing the size of our nuclear stockpile.

I ask that you include my comment as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project.
Thank you.

Sincerely,
R Frame
2530 blaisdell ave
apt 403
minneapolis, MN 55404

cc:
Representative Keith Ellison
Senator Norm Coleman
Senator Amy Klobuchar

1

Franklin, Naomi

Page 1 of 1

PC_2045

Buenaflor, Delight

From: franklin@biology.utah.edu
Sent: Friday, April 25, 2008 11:10 PM
To: DIV.Complex.Transformation
Subject: Complex Transformation SPEIS

TWIMC:

I write in opposition to the present Complex Transformation proposal by U. S. Dept. of Energy. Rather than reinventing new nuclear weapons and the means to create them, we should be heading towards the elimination of the nuclear scourge. At the least there should be extensive analysis of the role of nuclear force in the present world, leading to a policy that is consented to by Congress, following national consideration.
It is painfully significant that this most crucial issue is not even mentioned by present presidential candidates.

1|16A

2|11B Times have changed since nuclear weapons were formulated as deterrants of military action between U.S. and U.S.S.R.. Now nuclear capability has spread thru the world, and the world is full of non-governmental miscreants who cannot be held to account. Nor can the fissile materials used in nuclear weapons be adequately monitored. It remains for the world leaders to denounce the nuclear scourge and set an example to the rest of the world by committing to nuclear reduction–NOT to nuclear renewal or proliferation.

3|1J We are already committed to the Comprehensive Test Ban Treaty, and have agreements to reduce the ridiculously large number of nuclear weapons in our arsenal. These agreements have not been met. We should pledge to no first use of nuclear weapons. And regain the moral authority to lead the world to a moritorium on the development of nuclear weapons and verifyable monitoring/reductions of nuclear materials.

4|1F 1|16A (cont)
Sincerely,

Naomi Franklin, PhD.
1411 Utah Street #4
Salt Lake City, UT 84104

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Fraser, William
Page 1 of 1

PC_785

Levens, Matthew

From: William Fraser [bfraser@alumni.ucsd.edu]
Sent: Wednesday, March 12, 2008 1:56 AM
To: Complex2030
Subject: Please oppose the construction of nuclear weapons

William Fraser
702 California St
Santa Cruz, CA 95060-4243

March 12, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|3A We do not need any more facilities for building nuclear weapons, we have more than enough already.

2|16A; 3|1J The United States should be doing everything in its power to minimize nuclear proliferation -- and that definitely includes not building our own nuclear weapons.

Please, do not continue down this long, long dead-end road,

bill

Sincerely,

William Fraser

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Freeman, Kenneth
Page 1 of 1

PC_13

SOC
Los Alamos

March 5, 2008

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
US Department of Energy-NNSA
1000 Independence Avenue, SW
Washington, DC 20585

SUBJECT: COMPLEX TRANSFORMATION PLAN – GM-011-08

Dear Mr Wyka:

1|15A SOC Los Alamos, the Protective Force subcontractor for Los Alamos Laboratory is proud to endorse and support the proposed transformation announced by the National Nuclear Security Administration. We believe the Complex Transformation Plan makes sense for the United States and focuses our national priorities in a more cost-effective and environmentally responsible way.

2|13C We are supportive of Los Alamos National Laboratory's role in the future as substantiated by its exceptional work in many fields of science and technology. As a member of "team Los Alamos" 1|15A (cont) we strive to keep this premier facility secure around the clock.

3|10B In our view, Los Alamos National Laboratory is a unique national resource. Its contribution to the most technologically demanding needs of our past as a nation is unequalled. LANL is a major employer of Northern New Mexico and indeed attracts some of the brightest scientific minds world wide. Thank you for the opportunity to comment.

Sincerely,

Kenneth M. Freeman
General Manager

KMF:

Cc: GM Letter File

P.O. Box 1400 , Los Alamos, New Mexico · 87544 · (505) 667-4531 · fax (505) 665-7759

French, Jean
Page 1 of 1

PC_522

Buenaflor, Justin

From: Jean French [jwf267@yahoo.com]
Sent: Friday, February 22, 2008 7:39 AM
To: Complex2030
Subject: Nuclear proposals won't help

Jean French
1630 Yakona Rd
Towson, MD 21286-2348

February 22, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|13A.1 2|16A Nuclear weapons have never made anyone safer. I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

3|1J I am also opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal.

4|8A; 2|16A (cont.) Congress rebuked the Energy Department's last attempts to upgrade the arsenal by defunding the Reliable Replacement Warhead and last year's proposed mega-scale bomb plant. The CMRR project is another irresponsible new program that should be rejected.

Please; weaponry just makes others unwilling to discuss anything with us, and makes the world less safe. Diplomacy (talking with others about their issues and needs, and our issues and needs) is the only method that works. Let's put our funding and our efforts into what works, OK?

Thank you.

Sincerely,

Jean French

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Fresquez, Paul
Page 1 of 1

Page 1 of 1

PC_507c

Buenaflor, Delight

From: paul f [pfresque@yahoo.com]
Sent: Thursday, April 03, 2008 5:04 PM
To: DIV.Complex.Transformation
Subject: Form Post from Firefox

Last Name=Fresquez
First Name=Paul
Email Address=pfresque@yahoo.com
Street Address=10201 Country Meadows Dr. NW
City=Albuquerque
State=NM
ZIP Code=87114
1|15A Comments=I support LANL and their new mission in the 21st century. I believe the research done at LANL is essential to the security of the USA and throughout the world. Shifting the LANL's mission elsewhere would be a travesty.

You rock. That's why Blockbuster's offering you one month of Blockbuster Total Access, No Cost.

5/28/2008

Freyer, David
Page 1 of 1

PC_1593

Levens, Matthew

From: Physicians for Social Responsibility [webmaster@psr.org] on behalf of David Freyer [djf@loxinfo.co.th]
Sent: Saturday, April 05, 2008 10:33 PM
To: Complex2030
Subject: WE don't need new nuclear weapons

Apr 5, 2008

Mr. Theodore Wyka
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Wyka,

My comments on the Draft Complex Transformation PEIS
(DOE/EIS 0236 S4):

It is time to embrace a more enlightened view of humanity and human relations. Time to realize, as Eisenhower said, every bomb that is

1|9B made has taken food out of some child's mouth. Our financial resources are not infinite. We should be moving past fear, and become proactive in creating a better world for future generations. Funneling billions of dollars into death will not bring a better or safer future.

2|16A; We don't need more nuclear weapons.
3|1B We need a new mindset in government.
Thank you for your time in considering these concerns and comments.

Sincerely,

Mr. David Freyer
20045 Capella Dr
Monument, CO 80132-9731

Fried, Chris
Page 1 of 1

PC_413

Levens, Matthew

From: chrisfried@hotmail.com
Sent: Saturday, April 05, 2008 11:28 AM
To: Complex2030
Subject: Comments on U.S. Nuclear weapons (SPEIS) Complex

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|3A Instead of recreating the capacity to produce new, unnecessary, and unusable nuclear
2|16A; weapons, the DOE should focus on shrinking the nuclear weapons complex, and maintaining
3|1J their safety.

I ask that you include my comment as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project.
Thank you.

Sincerely,
Chris Fried
206 Norton Ave.
Vineyard Haven, MA 02568

cc:
Senator Edward Kennedy
Senator John Kerry
Representative Bill Delahunt

1

Fried, Chris
Page 1 of 1

PC_1941

Levens, Matthew

From: Chris Fried [chrisfried@hotmail.com]
Sent: Friday, April 18, 2008 1:07 PM
To: Complex2030
Subject: No new nuclear weapons!

Theodore Wyka
Complex Transformation SPEIS Document Manager,Office of Transformation, NA-10.1U.S.
Department of Energy/NNSA1000 Independence Avenue, SWWashington, D.C. 20585 Dear Mr. Wyka,
1|16A Please do not allow the production of new nuclear weapons. Nuclear conflict is an insane
2|3A policy, as is mutually assurred destruction.
Sincerely, Chris Fried
Martha's Vineyard Peace Council
206 Norton Ave., Tisbury, MA 02568 508-693-7741

Use video conversation to talk face-to-face with Windows Live Messenger.
http://www.windowslive.com/messenger/connect_your_way.html?
ocid=TXT_TAGLM_WL_Refresh_messenger_video_042008

1

Friedli, Carla
Page 1 of 1

PC_831

Levens, Matthew

From: Carla Friedli [carla.friedli@bvsd.org]
Sent: Thursday, April 03, 2008 10:17 AM
To: Complex2030
Subject: Stay the Fury of the Bomb

The Honorable Thomas P. D'Agostino

1|16A I am writing to implore you to do everything in your power to allow the Complex Transformation proposal to revamp the nuclear weapons program in the United States. I oppose the use of nuclear weapons on many grounds including moral, economic and practical reasons. We don't need more research to be aware that there will be no winners of a
2|1J nuclear war. Moreover, it was the build up of nuclear weapons in our recent past that has contributed to the instability of this world from terrorists and other governments willing to consider the use of these weapons. Given the financial stress the citizens of our
3|9H country are undergoing, can we in good conscience spend more of people's hard earned money to build up a program bent on destruction. I do understand the incredible pull of corporate interests in determining our policies. However, I look to you to be the moral example that puts an end to the interest of a few and to build a vision of peace and stability for all. Please do not support this nuclear weapon expansion. Please let me know
1|16A (cont.) if there is anything I can do to prevent the Complex Transformation program from proceeding.

Respectfully,

Carla Friedli, Ph.D.
5890 Prospect Road
Longmont, Colorado 80503
(303) 774-7749
carla.friedli@bvsd.org

1

Fritz, John
Page 1 of 1

PC_1109

Levens, Matthew

From: John Fritz [jfutures@umich.edu]
Sent: Thursday, March 27, 2008 1:22 PM
To: Complex2030
Subject: My opposition to rebuilding our nuclear arsenal

John Fritz
3338 Jennings Rd
Whitmore Lake, MI 48189-9267

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

Article VI of the Nuclear Non-Proliferation Treaty (NNPT) signed by the United States in 1968 states:

Each of the Parties to the Treaty undertakes to pursue negotiations in good faith on effective measures relating to cessation of the nuclear arms race at an early date and to nuclear disarmament, and on a Treaty on general and complete disarmament under strict and effective international control.

1|1F Since the administration has asked for money to build a facility to make triggers for nuclear warheads and to modify facilities across the country. This proposal would set up the infrastructure to allow the U.S. to build new nuclear weapons in the future.

This certainly is not in the spirit of the NNPT and I oppose making new triggers for new nuclear weapons.

2|1J I would propose that we unilaterally cut our nuclear warheads in half and invite the rest of the world to join us.

Sincerely,

John Fritz, Ph. D. in Physics

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Froines, Ann
Page 1 of 1

PC_366

Levens, Matthew

From: Ann Froines [ann.froines@umb.edu]
Sent: Friday, February 29, 2008 12:54 PM
To: Complex2030
Subject: opposition to nuclear weapons

Ann Froines
211 Treadwell St.
Hamden, CT 06517-2345

February 29, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

I am also opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal.

2|1J To be a leader in the movement against nuclear proliferation, the U.S. needs to say NO to the further development of nuclear weapons at home.

3|2O the majority of americans are against nuclear weapons as a tool of defense and foreign policy.

2|1J (cont) For the safe and healthy future of our children's children and our planet I support the goal of nuclear weapons abolition.

3|2O (cont) We are waiting for our representatives in Washington to reflect the beliefs of their constituents on war and peace issues, as would be the case in a true "representative democracy."

Sincerely,

Ann Froines
203-287-0530

1

Furney, Jane
Page 1 of 1

PC_289

Jane C. Furney
123 Liberty Court
Oak Ridge TN 37830
February 25, 2008

Mr. Ted Wyka
U.S. Department of Energy
National Nuclear Security Administration
Office of Transformation NA-10.1
1000 Independence Avenue, NW
Washington DC 20585

Dear Sir,

1|15A Please accept my vote "yes" to the transformation of the Y-12 National Security Complex to make the nation and the world a safer place and strengthening our freedom.

Sincerely yours, Jane C. Furney

Jane C. Furney (Mrs. C. P., Jr.)

Futrell, Sherrill
Page 1 of 1

PC_1535

Levens, Matthew

From: sherrill futrell [safutrell@ucdavis.edu]
Sent: Saturday, April 19, 2008 9:46 PM
To: Complex2030
Subject: Nukes

sherrill futrell
151 inner circle
Davis, CA 95618-5421

April 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A; 2|1J I do not want Bush to build factories to produce plutonium pits for nuclear weapons. I don't want to pay for them, either. It's just nuts to expect Iran not to build nuclear weapons while we go ahead with them.

3|1K It's de-stabilizing, and Bush has no business bringing us closer to war. He's already gotten hundreds of thousands killed - do we need more dead on our consciences?

Sincerely,

sherrill futrell

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Gabriel, Terrence

Page 1 of 1

PC_1873

Levens, Matthew

From: tgabriel@bellsouth.net
Sent: Friday, April 04, 2008 9:20 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|16A Mr. Wyka, you need to stop this insanity. You terrible little terrists will not respond to nukular threats, the cowboy or not.

Sincerely,
Terrence Gabriel
4400 Major Loring Way
Raleigh, NC 27616

cc:
Senator Richard Burr
Representative Brad Miller
Senator Elizabeth Dole

1

Gado, Ted

Page 1 of 1

PC_795

Levens, Matthew

From: Wyka, Ted
Sent: Friday, February 22, 2008 8:38 AM
To: Complex2030
Subject: Fw: Alternative

----- Original Message -----
From: Gado, Ted <TGado@roe.com>
To: Wyka, Ted
Sent: Thu Feb 21 14:29:16 2008
Subject: Alternative

1|15A Dear Sir,
2|5C Burns and Roe Inc. is in full support of the second alternative, Distributed Centers of
3|7N Excellence (continues uranium mission at Y-12 with new UPF)-NNSA. Thank you.

Regards,

Ted Gado
Director, Project Development

This email, including any attached files, may contain confidential, proprietary, privileged or other sensitive information for the sole use of the intended recipient(s). Any distribution or disclosure to persons other than the intended recipient(s) is inadvertent, and any review, use, distribution or disclosure by others is strictly prohibited. If you are not the intended addressee indicated in this message or authorized to receive information for the recipient, please contact the sender immediately by reply e-mail and delete all copies of this message including any attachments. Thank you.

1

Gaims, Teresa

Page 1 of 1

PC_1552

Levens, Matthew

From: Teresa Gaims [sc716hi@aol.com]
Sent: Tuesday, April 08, 2008 11:11 PM
To: Complex2030
Subject: Reject "Complex Transformation" plan to build nuclear weapons

Teresa Gaims
123 Meadow Rd.
Santa Cruz, CA 95060-2013

April 8, 2008

Theodore A Wyka
Complex 2030 SEIS Document Manager
Office of Transformation, U.S. Department of Energy, NA–10.1 1000 Independence Avenue, SW.
Washington, DC 20585

Dear Theodore Wyka:

1|16A The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal.

Dear Mr. Wyka,
I am writing to urge you to stop the Complex Transformation weapons production.

2|1F; 3|1J 1) It violates the Non-proliferation treaty. At a time when we are condemning weapons development around the world, it is hypocritical to dangerously throw off the balance of power by producing a new, usable class of nuclear weapons.

4|9H 2) Complex Transformation is expected to cost upward of $150 billion and is a waste of taxpayer money. Revamping the current arsenal could also lead to renewed nuclear tests.

5|14O 6|14M 7|7J 3) The development of new nukes leads to increased environmental hazards. We still have no proven, safe ways to discard nuclear waste, and the DOE should clean up its mess before creating more.

8|13A1 4) More profit for defense contractors does not equal a safer more stable United States. The DOE should be driven by what is best for this country, not corporate interests.

3|1J (cont) By building up its nuclear arsenal right now, the US is essentially telling the world, "Do as I say, not as I do."

Sincerely,

Teresa Gaims

1

Gaines, Brenda

Page 1 of 2

PC_1290

Levens, Matthew

From: Brenda Gaines [brendad@pioneer.net]
Sent: Tuesday, February 19, 2008 9:12 PM
To: Complex2030
Subject: nuclear Deal

Brenda Gaines
93706 Swamp Creek Rd.
Blachly, OR 97412-9707

February 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons. NO NUKES - CLEAN UP HANFORD

Hanford Nuclear Reservation is the most contaminated area in this hemisphere. It contains the nation's largest collection of nuclear waste from the production of weapons during World War II. The cleanup of Hanford is a multibillion dollar project -

1| 14m.3 As much as 450 billion gallons of contaminated wastes have been dumped into unlined soil trenches at Hanford. More than a third of the 177 underground storage tanks have leaked, resulting in more than a million gallons of liquid High-Level Nuclear Waste contaminating groundwater near the Columbia River.And a plume of radioactivity is seeping toward the Columbia.Radioactivity has been detected in the water in the vicinity of the Hanford site and downriver. Hanford has encountered radioactive wasp nests. Workers have found many slightly contaminated nests in the nooks and crannies of the H Reactor complex next to the Columbia River. "There's more than dozens," radioactive mud If Hanford is not cleaned up in a timely manner the waste will permanently contaminate the life- blood of the NW: our Columbia River.

The amount of money required to fund the all essential safety and cleanup work of nuclear contamination required by the Hanford Clean-Up Agreement and environmental laws , (the basic legal requirements towards stopping the spread of chemicals and radioactive wastes towards the Columbia River) is astronomical.$2 billion a year. An army of workers numbering more than 11,000 -FOREVER.

Based on the 2004 Hanford Solid Waste Environmental Impact Statement, the US Department of Energy (USDOE) intends to ship several thousand truckloads of radioactive toxic waste from nuclear facilities around the country to be stored at Hanford.

The waste from the Three Mile Island Meltdown in PA was trucked to Hanford.
-
1| 14M.3 (cont) The federal Energy Department plans to dump more toxic waste at Hanford in 2008 - AND drastically delay Hanford Clean-Up by more than 20 years! - People report accidents at Hanford all the time; "On Friday, July 27, 2007 a geyser from Hades erupted at the Hanford Nuclear Reservation. In the wee hours of that morning, a water line became clogged with radioactive sludge as thick as peanut butter, sending a big chunky mass of the hottest, most deadly material found on the site spattering to the ground and contaminating the air. Approximately 50 to 100 gallons of the toxic waste leaked. The reaction was pathetic. Hanford contractors and the U.S. Department of Energy spend a lot of our tax dollars and are apparently incompetent guilty of reckless endangerment of the health of workers and the public."

Beryllium, a silvery metal, is used in nuclear fuel and weapons. Its use at Hanford was kept a secret for many years despite the fact that even tiny exposures can lead to a fatal

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Gaines, Brenda

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1| 14M.3 (cont) disease. Workers were exposed in dozens of buildings at Hanford without any notice. At least 46 diagnoses of Hanford workers with Beryllium exposure were made in 2004. Yet DOE only received 17 Hanford workers' compensation claims for Beryllium exposure that year. "A lot of workers give up because they can't fight the system."
Medical services at Hanford are contracted through the DOE.
There are scores of buildings at Hanford with Beryllium contamination, many of which workers continue to use. To their peril.

1| 14M.3 (cont) The people who are running Hanford are criminals!
1986: 20,000 documents that had been kept secret are released to the public, including information about the Green Run, an intentional release of radioactive iodine 131 for two days in 1949. Radiation levels higher than government-established limits reached as far north as Spokane and as far south as California. - I think that it is fair to say that nuclear power has failed to live up to expectations. Hailed in the early 1960s as a source of clean, inexpensive and dependable energy, nuclear power plants have proven to be anything but. From the outset, the nuclear industry in this country has largely been subsidized by taxpayers. After the tragic accidents at Chernobyl and Three Mile Island the American people wisely demanded that construction of new nuclear plants be stopped. Since that time we have learned an awful lot about the consequences of generating nuclear power. To begin with, the mining and milling of the uranium needed to fuel these plants is extremely costly and consumes huge amounts of fossil fuels in the process. These costs will only rise in the future as we attempt to extract uranium from ever more remote

2|1N1. A locations. THERE IS ONLY 8 MORE YEARS OF MINABLE URANIUM Secondly, more than four decades after the first plant went on-line we have yet to solve the problem of what to do with the highly toxic and radioactive nuclear waste that has been accumulating for all these years. This is a very dangerous situation which has serious implications for the environment and for literally hundreds of generations to come. And with no solution to this problem in sight why in the world would we even consider constructing more new plants?

A 2004 study by Synapse Energy Economics entitled " A Responsible Electricity Future" which concludes that energy conservation and energy efficiency alone can reduce U.S. electricity demand by nearly 28% by the year 2025. That sounds perfectly reasonable to me.

-
IN GERMANY
The secure and constant provision of power anywhere and at anytime by renewable energies is now made possible thanks to the Combined Power Plant. The Combined Power Plant links and controls 36 wind, solar, biomass and hydropower installations spread throughout Germany. It is just as reliable and powerful as a conventional large-scale power station.

The Combined Renewable Energy Power Plant shows how, through joint control of small and decentralised plants, it is possible to provide reliable electricity in accordance with needs. The Combined Power Plant optimally combines the advantages of various renewable energy sources. Wind turbines and solar modules help generate electricity in accordance with how much wind and sun is available. Biogas and hydropower are used to make up the difference: they are converted into electricity as needed in order to balance out short-term fluctuations, or are temporarily stored.
Technically, there is nothing preventing us from 100 per cent provision with renewables. -

Sincerely,

Brenda Gaines
(541)927-3092

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Gall, Joyce

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PC_1399

Levens, Matthew

From: Joyce Gall [joygall@comcast.net]
Sent: Wednesday, April 23, 2008 9:17PM
To: Complex2030
Subject: Stop new nukes

Joyce Gall
4810 Mahalo Drive
Eugene, OR 97405-4609

April 23, 2008

Complex Transformation

Dear Complex Transformation:

1|1J, 2|16A I am opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal. We should spend the billions proposed for this plan on programs to eliminate nuclear weapons.

3|9B Have you read the Union of Concerned Scientists' proposal for ENDing nuclear proliferation? Have you thought through the dangers inherent in expanding the US nuclear arsenal, as well as the costs? It is insane to pursue this policy. I live in Eugene, Oregon, and am a research psychologist and educator who is well aware of the damage military spending has done to our safety and to our country's ability to take care of business involving the health and welfare of its own citizens. I was born soon before the bombing of Pearl Harbor, and I am TIRED of the U.S.'s excessive, heartless response to other nations with whom it disagrees or wishes to control.

Sincerely,

Joyce Gall
541 687-9055

Gallagher, Esther

Page 1 of 1

PC_872

Levens, Matthew

From: esther gallagher [esthergallaghe@sbcglobal.net]
Sent: Thursday, March 27, 2008 2:36 PM
To: Complex2030
Subject: an absurdity

esther gallagher
3600 20th St. Apt. #205
San Francisco, CA 94110-2351

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A Einstein said we cannot simultaneously prevert and prepare for war.
no government, especially ours, is entitled in any way to prepare to harm humans, animals
and their environment, our planet. all weapons are immoral and irrational. what is
rational is to continually seek to be non-defensive, compassionate, moral and ethical.
2|1J our government is in a unique postition to urdertake such a project. it is hypocritical to
do otherwise. we ARE responsible, whether or not we choose to behave in such a manner.
scapegoating other nations will not do, nor is it fooling anyone of moral character.

Sincerely,

esther gallagher

Gallagher, Pat

Page 1 of 1

PC_681

Levens, Matthew

From: Pat Gallagher [gallagher1@llnl.gov]
Sent: Tuesday, March 25, 2008 3:23 PM
To: Complex2030
Subject: Question

To whom it may concern,

My name is Patrick Gallagher and I work at LLNL Site 300. I have a question and I'm
hoping you can provide me with an answer.

1|10C
I have heard that Site 300 will close in 2015. There are facilities at
2|6A Site 300 that provide support to the High Explosives Application Facility
(HEAF) in Livermore. Since HEAF has been identified as a "Center of
Excellence" for high explosives research and development will the
facilities at Site 300 that support HEAF remain open after 2015?

Patrick J. Gallagher

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Galt, Margot
Page 1 of 1

PC_90

MARGOT GALT - 1177 Laurel Ave., St. Paul, MN 55104
Phone: 651-644-1697 email: mgalt@juno.com

Feb 27, 2008

Mr. Theodore Wyka
US Department of Energy
1000Independence Ave. SE
Washington, DC 20585

Dear Mr. Wyka,

1|16A
2|3A
I am writing to oppose the development and manufacture of additional nuclear weapons in the United States. Not only do we have a plethora of weapons, but the US should be pursuing a commitment to rid the world of the nuclear threat. Especially in this straightened economy, when we are already engaged in an unnecessary war (made necessary only because our initial invasion demolished a relatively stable, even friendly regime), I strongly urge you to resist any attempt to add to our already huge burden of nuclear weapons, and instead abandon the cold war mentality and work for peace.
3|9B
4|1J

Sincerely,

Margot Galt

Gannon, Frank
Page 1 of 1

PC_477

Buenaflor, Justin

From: Frank Gannon [gannonfrank@hotmail.com]
Sent: Tuesday, March 11, 2008 1:50 PM
To: Complex2030
Subject: Stop nuclear "complex transformation"

Frank Gannon
Box 547 250 holly st.
Demorest, GA 30535-4909

March 11, 2008

DOE Complex Transformation

Dear DOE Complex Transformation:

1|16A;
2|1J
The proposed "complex transformation" is a terrible idea.I am writing to express my opposition to the National Nuclear Security Administration's
(NNSA) plan to revamp the nuclear weapons complex under Complex Transformation. Going forward with this program is dangerous, expensive, and unnecessary.

Complex Transformation will jeopardize US national security by hindering international non-proliferation initiatives and crippling international nuclear disarmament efforts. Revamping the massive industrial infrastructure whose primary purpose is to build new nuclear weapons will make it impossible to convince other countries not to rely on nuclear weapons.

Nuclear disarmament should be our primary goal. Instead of going forward with Complex Transformation, DOE should adopt a curatorship program to safeguard, not augment, nuclear weapons until complete dismantlement of the nuclear stockpile occurs.

Sincerely,

Frank Gannon
706-778-9063

1

Garber, Anne
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PC 233

Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

Written Comment Form

Must be received on or before April 10, 2008.

1|3A There is no possible reason for building yet another bomb complex. The world already has more than enough nuclear material to blow itself up.

2|14I Local leaders and present employees are touting the necessity of the complex to fill jobs. Jobs are not as important as the continued existence of the globe. There is no such thing as a guaranteed job, nor is a job helping to produce weapons of war of any redeeming social value. I am strongly opposed to this project.

Anna Garber (GARBER)
111 Vanderview Drive
Jefferson, TN 37865

Please use other side if more space is needed.

Comment forms may be mailed to:
Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Comment forms may be faxed to:
(703) 931-9222
or sent by electronic mail to:
complextransformation@nnsa.doe.gov

You may also submit comments through the project website which can be found at:
http://www.complextransformationspeis.com

Garcia, Paula
Page 1 of 3

PC_1909

Levens, Matthew

From: Paula Garcia [lamorena@lasacequias.org]
Sent: Wednesday, April 30, 2008 6:49 PM
To: Complex2030
Subject: Comments on Complex Transformation EIS

Attachments: DOE.Bombplex.Comments.Apr.2008.doc

DOE.Bombpl
mments.Apr.2

See attached letter.

1

Garcia, Paula
Page 2 of 3

New Mexico Acequia Association

PC_1909

Taos Valley • Mora Valley • La Joya • Rio de Chama • Acequias Norteñas • Questa/Cerro • Alcalde/Velarde/El Guique • South Valley • Rio de las Gallinas • Mimbres Valley • Chamisal y Ojito • Gallina/Capulin • Embudo Valley • El Rito • Carnuel • Rio San José • Rio Jemez • Rio Tularosa • Rio Quemado, Rio en Medio, Rio Frijoles, Rio Santa Cruz • Rio Pecos • Rio Pojoaque • Upper Rio Hondo • Estancia Valley • Santa Teresita

805 Early Street, Building B, Suite 204
Santa Fe, NM 87505
(505) 995-9644
www.lasacequias.org

April 30, 2008

Mr. Theodore Wyka
C-T SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Re: Public Comment to the draft Complex Transformation Supplemental Programmatic Environmental Impact Statement, DOE/EIS-0236-S4

Dear Mr. Wyka,

I am writing on behalf of the New Mexico Acequia Association with regard to Complex Transformation and the proposed expansion of nuclear weapons manfacturiing at Los Alamos National Laboratory (LANL).

Hundreds of acequias form the basis for the historic agricultural production in North Central New Mexico. These acequia communities have been and will be impacted by expanded nuclear weapons manufacturing at LANL through air emissions, discharges to water and burial of waste in the land. We just learned of the transformation complex document and request a 90-day extension of time to provide informed public comments to DOE. 1|2E

Our primary concern at this point is that DOE states "there are no agricultural activities present at LANL, nor are there any prime farmlands in the vicinity." p. 4-2. For DOE, a "vicinity" or "region of influence" is generally an area within a 50-mile radius of its facility. 2|14A

DOE defines "prime farmlands" as "land that has the best combination of physical and chemical characteristics for producing food, feed, fiber, forage, oil seed, and other agricultural crops with minimum inputs of fuel, fertilizer, pesticides, and labor, without intolerable soil erosion, as determined by the Secretary of Agriculture (Farmland Protection Act of 1981, 7 CRF 7, paragraph 658)." p. 13-27.

Garcia, Paula
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On its face, a DOE claim that there are no prime farmlands in the vicinity of LANL is wrong. Before the Atomic Energy Commission arrived on the Pajarito Plateau in 1943, all this land was prime farmland. LANL is located within the food basket of Northern New Mexico.

The current draft assessment does not acknowledge that there are prime farmlands within a 50 mile radius of LANL. We represent many acequias in the areas surrounding LANL including the Espanola Valley, Pojoaque Valley, and the Jemez Valley. The acequias are the foundation for community-based water management and the source of water for thousands of acres of prime farmland. These lands are essential to the continued land-based way of life embodied in the acequias and are part of the cultural heritage and patrimony of the State of New Mexico and the United States. Thousands of families continue to derive all or part of their livelihood from the acequias and their farmlands. 2|14A (cont) 3|14E

Expanded nuclear weapons manufacturing at LANL is likely to impact these farmlands and the communities that depend on them. First, we are concerned about potential radioactive contamination of our precious lands and waters. Second, the draft assessment does not address the source of water for the manufacturing processes. Water is extremely scarce in northern New Mexico and we are concerned that the impacts to senior water rights have not been addressed.

DOE must retract the draft Complex Transformation Supplemental Programmatic Environmental Impact Statement and reassess the LANL impacts to agriculture. Then DOE must submit the revised draft to the public for review and public comment. 4|2B

Sincerely,

Paula Garcia, Executive Director
New Mexico Acequia Association

cc: Senator Pete Domenici at (505) 988-6511, fax (505) 988-6514
Senator Jeff Bingaman at (505) 988-6647, fax (505) 992-8435
Representative Tom Udall at tom.udall@mail.house.gov
Representative Heather Wilson at (505) 346-6781, fax (505) 346-6723
Representative Steve Pearce at (505) 522-2219, fax (505) 522-3099
Governor Bill Richardson at (505) 476-2200
President Pro Tempore Tim Jennings at (575) 623-8331, fax (575) 623-9378
House Speaker Ben Lujan at ben.lujan@nmlegis.gov

Garger, Cathy
Page 1 of 11

PC_1937

Levens, Matthew

From: Cathy Garger [savorsuccesslady3@yahoo.com]
Sent: Wednesday, April 30, 2008 5:40 PM
To: Complex2030
Subject: Anti-Radiological Complex Transformation Testimony

Dear Complex Transformation Decision Maker,

If you are a human being with a heart and a conscience, please continue to read. If you are not, then it will not matter whether or not you read it, as you will do only that which you think might keep you gainfully employed and possibly even promoted.

If you are still reading, there may be some hope that you are not a total psychopath. Do you possess a conscience? Do you feel even a bit guilty knowing you are causing harm to others? Do you care whether others live or die by your decision?

1|14O **Please tell me honestly, does it bug you when you hear that an eight year old near Livermore, California's Site 300 (within 50 miles of 7 million in the SF Bay area) is dying of leukemia, or a 32 year old mother of three living near the Nevada Test Site has lost her life to breast cancer?**

When you hear of these casualties of the DOE, do you shed a tear? Or do you keep right on working, shrugging off the inevitable "necessity" of so many innocent Americans needing to be "sacrificed" in order to keep on waging these wars of aggression on some manufactured "War on Terror" somewhere across some sea?

Perhaps you have a bit of guilt around the fact that when you clock in at work, you are a Bona Fide Manufacturer of Death? Maybe you do not enjoy the fact that your work harms many more people than you would even like to think about?

If you are still reading and you know in your heart that exploding radioactive materials out into the environment is harmful to public health, then here is your opportunity to absolutely make a difference! You can try to push for whatever of your options will kill the SMALLEST number of Americans who have done absolutely nothing to deserve slaughter via radiation, right here at home.

2|16A **I am vehemently opposed to all Uranium weapons production and open air, so-called "testing" (hmmm) in the US at the various DOE locations. Despite what is told to the public, radiation of every type either damages and/or destroys all cells with which it comes into contact.**

I implore you to PLEASE read what Epidemiologist and Radiation Specialist, Sister Doctor Rosalie Bertell, has to say (below) about Uranium-238 aerosol, the same stuff you explode at DOE locations.

1|14O (cont) **Depleted Uranium has a half-life of 4.5 billion years. Each and every time you explode it, you are killing off cells of not *just* humans, but of all living things that come into contact with it... for an eternity!**

Dr. Chris Busby of the Low Level Radiation Campaign www.llrc.org demonstrated that in the US military "Shock and Awe" bombing campaign of Baghdad, the Uranium aerosols traveled in the winds 2,500 miles to the UK in just nine (9) days!

Garger, Cathy
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www.mindfully.org/Nucs/2006/DU-Europe-Contamination1jan06.htm

The Uranium you have been exploding for many decades near San Francisco, CA, in Nevada, and in New Mexico, depending on wind direction and current, reaches me over on the east coast within a week or so.

1|14O (cont) **Do you think that the Uranium you explode into aerosols - Uranium oxide gases - just float up, up, up into the sky indefinitely... maybe until they reach... Heaven? Or, do you believe the tall tale the US military tells us - that Uranium nanoparticle sized aerosols (gas) just travel 50 meters and then settle quickly, obediently, thoughtfully right down to the ground?**

Do you not know - or care - that you are radioactively poison-gassing your own self, your own family and friends, even your own pets, too?

I happen to like to breathe, so I take issue with breathing the radionuclides you have allowed to be exploded into my air. I also like to eat foods not contaminated by the radioactivity in the soils, so that is another bone I have to pick with you.

If you possess even half a conscience, you will FIND a way to STOP this radiation madness!

By allowing radioactive production and explosions to continue, You, as an employee of DOE engaged in decision making, are assisting in the toxic and radiological poisoning of countless numbers of US innocents and their descendents with damaged and mutated genes -as well damage caused to all other forms of life in our country - for a total of 4.51 BILLION years!

I BEG of you to PLEASE do whatever you can do to STOP, once and for all, the production of all radiological materials, and the exploding of Uranium, Tritium, and other radionuclides in the open air inside the United States at all DOE sites.

Is it too much of me to ask you to please STOP RADIOACTIVELY POISON GASSING me, all those I care about, and all the rest of us in this country, too?

You are violating basic human rights granted under international law in the US by exploding Uranium-238 out into our air. On behalf of all those 300 Million of us who ask nothing more than to breathe clean air, drink pure water, and eat food not contaminated with radiation, I ask that you cease and desist this practice immediately!

We are lawfully paying our tax dollars for your employer to weaken, sicken, and eventually kill countless millions of Americans - not to even mention the unfathomably large numbers of Asians and Africans butchered daily by your radioactive handiwork... via Made-In-The-USA-Uranium weapons, fired and exploded in combat by our military's tanks, planes, cannons, ships.

If this bothers you even a teeny, tiny, little bit? I URGE you to PLEASE allow your conscience to be your guide and do whatever you can do to stop this Uranium poisoning madness!

ON BEHALF OF ALL LIVING THINGS IN THE US I IMPLORE YOU TO MAKE THE DECISION TO STOP PRODUCTION OF RADIOACTIVE MATERIALS IMMEDIATELY, AND HALT ALL OPEN AIR EXPLOSIONS OF ALL RADIOACTIVE MATERIALS NOW!

Thank you.

Sister Doctor Rosalie Bertell's works appear below.

Garger, Cathy
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Sincerely,

Cathy Garger
Maryland

Internal contamination means exposure of sensitive tissues and organs inside of the body to ionizing alpha and beta particles. Calculating the dose from that exposure requires knowing how long the exposure lasts and exactly where the emitters are lodged. Uranium dust in a mine stays in the body for a few days, other uranium compounds stay for weeks, but a significant fraction of the ceramic DU must stay in the body for 10s of years.

1|14O (cont)

All of the isotopes of uranium are chemically toxic, especially to the kidney. This toxicity has been studied in the uranium miners and millers, and is based on particle size with average diameter of about 5 micron, and with uranium having high solubility in body fluid. The biological half life of uranium dust is measured in days, for the largest fraction. The retaining fraction is sequestered from the circulatory system by its capture in the bone. These unique characteristics are apparently not repeated in the uranium oxide created in combat situations. For these reasons, the Rand Report [Ref 11], which was a search of the literature on uranium mining, was rather useless. This report, so widely circulated and quoted, did not deal the DU used on the battlefield, so its conclusions are pertinent only to literature on those health effects of uranium in the mines and mills which have been researched.

The chemical toxicity of uranium, more broadly discussed, can be found in Encyclopedia of Occupational Health:
«Uranium poisoning is characterized by generalized health impairment. The element and its compounds produce changes in the kidneys, liver, lungs and cardiovascular, nervous and haemopoietic systems, and cause disorders of proteins and carbohydrate metabolism.....Chronic poisoning results from prolonged exposure to low concentrations of insoluble compounds and presents a clinical picture different from acute poisoning» [Ref 12.].
Because of the long half-life in the body, DU contamination with micro and nano-particles would be considered to be «chronic».

«The outstanding signs and symptoms [of chronic poisoning] are pulmonary fibrosis, pneumoconiosis, and blood changes with a fall in red blood count: haemoglobin, erythrocyte and reticulocyte levels in peripheral blood are reduced. Leucopenia may be observed with leukocyte disorders (cytolysis, pyknosis, and hypersegmentosis). There may be damage to the nervous system. Morphological changes in the lungs, liver, spleen, intestines and other organs and tissues may be found, and it is reported that uranium exposure inhibits reproductive activity and effects uterine and extra-uterine development in experimental animals. Insoluble compounds tend to be retained in tissues and organs for long periods» [Ref 13.].

Toxicology based only on the amount of soluble uranium required to damage the kidney tubules, is less than honest in the face of the known uranium-related health problems. Use of DU as a weapon, in the face of this prior knowledge, and the failure of the military of both the U.S. and U.K. to keep records of the pre-exposure clinical data of all military, for comparison with the post-exposure data, is unconscionable. The ILO material has been in the public domain since 1985, and is a common reference for concerned physicians.

Laboratory and Animal Studies of DU:
Animal experiments have demonstrated that uranium exposure results in damage to the entrance portals: namely, respiratory and gastro-intestinal systems; and to the exit portals: the lower intestine and renal systems. Uranium oxide was associated with fibrosis and other degenerative changes in the lungs,

Garger, Cathy
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proteinuria, and increased non-protein nitrogen and slightly degenerative changes in the kidney tubules, in animals. Uranium oxide is associated with focal necrosis of the liver, and with hematological changes, lymph node fibrosis, severe muscle weakness and lassitude at doses inhaled in polluted air with concentration between 0.2 and 16 milligram per cubic meter. Damage to body organs of animals occurred at concentrations as low as 5 microns per cubic meter of air [Ref 14.].
In vitro studies on human osteoblast cells have indicated that they may be transformed to the tumorigenic phenotype, including induction of tumor when implanted into mice, differences in ras oncogene expressions, and phosphorylation by DU administered as uranyl chloride. The interaction of uranium with phosphorus containing groups in DNA is well documented [Ref 15.].
http://www.iicph.com/docs/du_update_2_3.htm

1|14O (cont)

Uranium oxide and its aerosol form are insoluble in water. The aerosol resists gravity, and is able to travel tens of kilometres in air. Once on the ground, it can be resuspended when the sand is disturbed by motion or wind. Once breathed in, the very small particles of uranium oxide, those which are 2.5 microns [one micron = one millionth of a meter] or less in diameter, could reside in the lungs for years, slowly passing through the lung tissue into the blood. Uranium oxide dust has a biological half life in the lungs of about a year. According to British NRPB [National Radiation Protection Board] experiments with rats, the ceramic or aerosol form of uranium oxide takes "twice as long" or about a two year biological half life in the lungs, before passing into the blood stream. [Stradling et al 1988]

Because of coughing and other involuntary mechanisms by which the body keeps large particles out of the lungs, the larger particles are excreted through the gastro-intestinal tract in feces. The uranium compounds which enter the body either through the wall of the gastro-intestinal tract or the lungs, can be broken down in the body fluids, and tetravalent uranium is likely to oxidize to the hexavalent form, followed by the formation of uranyl ions. Uranium generally forms complexes with citrate, bicarbonates or protein in plasma, and it can be stored in bone, lymph, liver, kidney or other tissues. Eventually this uranium which is taken internally is excreted through urine. Presence of depleted uranium in urine seven or eight years after exposure is sufficient evidence to substantiate long term internal contamination and tissue storage of this radioactive substance.

Uranium is both a chemical toxic and radioactive hazard: Soluble uranium is regulated because of its chemical toxicity, measured by damage to the kidney and tubules. Uranium is a heavy metal, known to cause uranium nephritis. Insoluble uranium, such as was released in the Gulf War, is regulated by its radiological properties, and not its chemical properties. Because of its slow absorption through the lungs and long retention in body tissues, its primary damage will be due to its radiological damage to internal organs rather than chemical damage to the renal system. Obviously, both types of damage occur simultaneously, therefore it is a matter of judgment which severe damage, radiological or chemical, occurs at the lowest dose level. However, with the lengthening of the time during which the contaminant resides in the body and the low overall dose, the risk of cancer death becomes greater than the risk of significant damage to the renal system.

Uranium decays into other radioactive chemicals with statistical regularity. Therefore, in its natural and undisturbed state, it always occurs together with a variety of other radioactive chemicals, some of the best known being thorium, radium, polonium and lead.

Natural uranium in soil is about 1 to 3 parts per million, whereas in uranium ore it is about 1,000 times more concentrated, reaching about 0.05 to 0.2 percent of the total weight. Depleted uranium concentrate is almost 100 percent uranium. More than 99 percent of both natural and depleted uranium consists of the isotope U-238. One gram of pure U-238 has a specific activity of 12.4 kBq, which means there are 12,400 atomic transformations every second, each of which releases an energetic alpha particle.
Uranium 238 has a half life of 4.51 E+9 (or 4.51 times 10 to the 9thpower, equivalent to 4,510,000,000

Garger, Cathy
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years).

Each atomic transformation produces another radioactive chemical: first, uranium 238 produces thorium 234, (which has a half life of 24.1 days), then the thorium 234 decays to protactinium 234 (which has a half life of 6.75 hours), and then protactinium decays to uranium 234 (which has a half life of 2.47E+5 or 247,000 years). The first two decay radioisotopes together with the U 238 count for almost all of the radioactivity in the depleted uranium. Even after an industrial process which separates out the uranium 238 has taken place, it will continue to produce these other radionuclides. Within 3 to 6 months they will all be present in equilibrium balance. Therefore one must consider the array of radionuclides, not just uranium 238, when trying to understand what happened when veterans inhaled depleted uranium in the Gulf War.

1|14O (cont)

It should be noted that uranium 235, the more fissionable fraction which was partially removed in enrichment, makes up only 0.2 to 0.3 percent of the depleted uranium, whereas it was 0.7 percent of natural uranium. It is this deficit which enables one to use analytical methods to identify the uranium found in veteran's urine as depleted and not natural uranium. The U 235 was extracted for use in nuclear weapons and nuclear reactor fuel. Depleted uranium is considered nuclear waste, a by-product of uranium enrichment.

The difference in radioactivity between natural and depleted uranium is that given equal quantities, depleted uranium has about half the radioactivity of the natural mixture of uranium isotopes. However, because of the concentration of the uranium in the depleted uranium waste, depleted uranium is much more radioactive than uranium in its natural state.

Uranium and all of its decay products, with the exception of radon which is a gas, are heavy metals. Unlike some other heavy metals which are needed in trace quantities by the human body, there is no known benefit to having uranium in the body. It is always a contaminant.
http://www.ccnr.org/du_hague.html

On the other hand, Uranium subjected to melting and aerosol formation is of different aerodynamic form than the dust in a mine. Only about 75% of the inhaled aerosol is expected to be diverted to the gastro-intestinal tract. The 25% of inhaled ceramic and non-ceramic aerosol uranium, which remains in the lungs, has no exit except through the lung - blood barrier or into the lymph system. The lung is like a bag with no exit portal, such as we find in the rectum. If eventually the uranium in the lung dissolves in body fluid, it can be carried into the blood and circulated within the body. If it cannot be dissolved, it may be ground into very fine particles by the lung motion and eventually carried by monocytes [phagocytes] into the thoracic lymph nodes and the body's lymph system. [Ref.1]

After a uranium air contamination event it is important to do feces analysis for uranium within 48 hours of the exposure. This is obviously not a good test for the Gulf War Veterans some 8 or 9 years after their exposure in the Gulf War. However, had the governments been alert to the human dimensions of this exposure, they should have done testing immediately or at least taken specimens for later analysis. Civilians and Peacekeepers serving later in the contaminated area are less at risk than those exposed to an impact event, because the particles will not be airborne unless disturbed mechanically or by wind, and what is inhaled will be largely diverted into the stomach. There will be exceptions, and some particles can still become trapped in the lungs of an unsuspecting person.

Contact with depleted uranium metal will continue to be a hazard long after the war is over, especially for children and souvenir hunters. Children in Iraq have been seen playing with the radioactive debris left by the warriors.

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The Textbook «Military Radiobiology» strongly recommends prevention as the medical response to airborne uranium: **A self-contained breathing apparatus, gas mask, or at least fine-particulate mask should be used whenever airborne alpha radiation is present.**

Radioactive material entering into the body through the gastro-intestinal tract can do damage to the lining of the tract. If some is absorbed, it is shunted into the hepatic portal and sent through the liver. In the liver it can be stored or removed and sent to the kidneys, or released into the blood system. Some ingested toxins are detoxified in the liver, but this cannot be said for uranium. Radioactive material, which enters the body through the lung, has no such protective screening.

1|14O (cont)

While both the lungs and the gastro-intestinal tissue can be damaged by the passage of radioactive particulates, there is a greater concern for damage to the lungs when the uranium is in an insoluble form, since this radioactive material stays in the lungs for a very long period of time. We are talking about years rather than hours. There may be problems with intestinal damage at places where the intestinal material is temporarily held up, but generally the pollutant will move out in 24 to 48 hours.

Uranium can also affect the body by exposing the skin and by fragments which enter the body through friendly fire accidents. This subject is being followed and reported on by Dr. Melissa McDiarmid at the Veteran's Hospital in Baltimore, Maryland, USA [Ref. 6]. It will not be treated here.

BIOCHEMICAL BEHAVIOUR WITHIN THE BODY:
Uranium isotopes are a considerable hazard for accidental exposure through inhalation. [Ref. 1]
The effects of uranium differ with its chemical form, its solubility, and its biological half-life in organs and in the whole body, the tissues of incorporation, and the physiological factors that determine its metabolic fate. Uranium is highly reactive chemically, and the various chemical compounds, which it forms, will have different physical and chemical properties. Its fate in the body will change with the solubility of these compounds, particle size, homeostasis, biological decorporation and method of elimination. Uranium is bound by all of the biochemical properties of the molecule in which it is incorporated, but it will also be continually emitting alpha particles into the surrounding tissue and exerting its toxic heavy metal effect.

Uranium hexafluoride and uranyl nitrate hexahydrate dissolve easily and are taken up from the lungs in a few days, excreted in the urine within days, and are the most likely to cause kidney damage early on after an exposure. For a long time the US Veteran Administration confused this property of soluble uranium with the long-term effects of DU experienced in the Gulf War exposure. They therefore wrongly stated that none of the veteran's medical problems could be attributed to DU unless there was damage to the kidneys. Kidney damage is not expected to occur with the nearly insoluble compounds because of the slow excretion through the kidney and urinary system. However, there may have been a soluble component of the inhaled DU, which caused kidney problems early on after the war.

The chemical form of the DU inhaled in the Gulf, Bosnia and Kosovo Wars was most probably a mixture of: uranium trioxide, which is likely to remain for a few weeks in the lung tissue and in the thoracic lymph nodes); and, two other more insoluble chemical forms - uranium dioxide and triuranium octaoxide, which are likely to remain for several years in the lungs and thoracic lymph nodes). According to Dr. John Gofman, some of this insoluble radioactive debris may remain in the lungs for the rest of a person's life.

The soluble fraction of uranium which passes the lung-blood barrier, is expected to form chemical complexes with the bicarbonate in plasma (47%), form chemical bonds with protein in plasma (32%), and bind to the red blood cells interfering with iron transport (20%). [Ref. 7] The low molecular weight uranyl-bicarbonate will pass most easily through the renal glomerulus, and if the pH is low will rather

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quickly be passed through the kidneys and excreted in urine. This is the first fraction release, which depending on its rate of passage may or may not have caused kidney damage in Veterans early on after the exposure.

If the pH of the kidney is high, small amounts of the uranyl bicarbonate can be retained within the walls of the kidney. It would increase localized radiation doses to the kidney.

Uranium bound to protein or to erythrocytes will not easily pass through the renal glomerulus, and will likely stay in the blood or lymph. Uranium can be incorporated into bone, although if it is in ceramic form this may not occur.

RADIOLOGICAL ACTIVITY WITHIN THE BODY:
Radiation induces the formation of reactive chemical products when it enters a biological system [Ref. 1] It can effect the water inside cells, converting it to free radicals which can form harmful peroxides which in turn cause damage to the cell and its membrane. The radiation can also directly impact DNA and large molecules, breaking the molecular bonds and fragmenting the genetic material, the cell membrane, and the enzymes that the cell needs for repair.

1|14O (cont)

Damage to the membrane increases cell fluidity and permeability, leaving it vulnerable to viral and bacterial invasion. The process can cause the release of an inflammation cascade, or important biochemical mediators, which induce chronic problems. It can kill cells, or induce subtle changes in the cellular physiology of those cells that survive. This damage can in turn sensitise the organism to other insults. When cell membrane permeability is increased, there may be invasion by micobacteria and infections of various kinds can develop.

The most talked about effect, namely cancer, is most likely not the most frequent effect which is an increase in bio-feedback mistakes due to the breakage and disruption of molecules, a characteristic of the ageing process.
http://www.iicph.org/docs/host_response_to_du.htm

The sublimated particles of DU and the other metals are nano-sized particles. Nanoparticles are a billionth of a meter in size, and are smaller than microns. They act more like a gas than a particle. These nanoparticles can cross the lung-blood barrier and gain entrance to cells. There they create free radicals– an electron is either knocked out of orbit in a molecule or a molecule that has lost one of a pair of electrons but in either case, an electron is lost and the molecule wants to gain another electron as quickly as possible. It will take an electron randomly from the nearest molecule, which in turn needs an electron to make up for the one it has lost.
Free radicals are generated by ionizing radiation while the heavy metal toxicity attacks the proteins in the cell which normally fight the free radicals. (The heavy metal toxicity of DU also creates free radicals). Bertell says, “Some scientists believe that the oxidative stress (when there are too many free radicals and not enough antioxidants to neutralize them) caused by uranium’s heavy metal properties is even more damaging than its radiological properties. Total oxidative stress causes failure of protective enzymes, leaving cells vulnerable to viruses and mycoplasmas (bacteria without a cell wall). Damage to the cellular communication system and the mitochondria (where cellular respiration takes place), heavy metal replacement of magnesium in molecules that normally function as antioxidants, and destruction of the body’s repair mechanisms have serious consequences, including chronic disease and tumorigenesis”. (p. 507)
Bertell discusses how a protein is sequenced by DNA which is then manufactured by the RNA, after which it goes through a process of folding. The way it is folded influences its

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function. The folding process is complex. Bertell says, “Free radicals can totally disrupt this process, forming unusual molecules; and in the presence of heavy metals, the process may use trace amounts of toxic metals to replace the normally used zinc and manganese.” (p. 507)
Proteins that are not correctly folded may not be sent to cell membranes or glands where they are needed. Bertell says, “Some diseases caused by misrouted proteins include cystic fibrosis, diabetes insipidus and cancer” (p. 508).
Bertell adds that the amassing and accumulation of misfolded proteins leads to neurodegenerative diseases, Parkinson’s Disease and early- onset Alzheimer’s Disease. In these diseases, amyloids (pathological aggregations of nonbranching fibrils in bundles or forming a felt-like meshwork made from protein or protein fragments) are formed from protein fragments and dysfunctional proteins and that “Misfolded proteins are a central pathogenic mechanism, and Gulf War veterans have manifested many of the symptoms of these neurodegenerative diseases”. (p. 508)

1|14O (cont)

Lou Gehrig’s disease is twice as commonly diagnosed in Gulf War veterans as expected. A disease of older people, it has attacked young veterans. Although Lou Gehrig’s disease (or ALS) is considered to have no known cause, Bertell says, “it seems clearly related to the failure of anti-inflammatory and antioxidant enzymes together with mitochondria dysfunction”. It is more complicated than this but oxidation or the production of free radicals in lipids (fats) in the brain can cause faulty regulation of cytokines, small proteins that communicate between neurons and glia cells (brain cells made of lipids) which become toxic through “neuro-inflammation”, killing neurons.
In the section, **“Immune and Hormonal Systems Damaged in the Gulf War”**, Bertell notes that “The DNA of mitochondria is 16 times more sensitive to radiation than is nuclear DNA”.
She goes on to define the action of free radicals, adding, “free radicals can effect dramatic and destructive changes in the cell and in the intercellular fluid.” (p. 509)
The body has endogenous antioxidants which neutralize free radicals. One is glutathione (GSH). One function of GSH is the repair of cellular structures damaged by free radicals. Bertell says, “This antioxidant function of GSH is normally credited as having anti-cancer properties, since it neutralizes free radicals. Cellular repair mechanisms depend heavily on the presence of GSH in cells.” (p. 509).
http://www.uraniumconference.org/dok/Bertell%2006.pdf

GSH also binds to heavy metals and is removed from **Other Isotopes of Uranium:** There are two more isotopes of uranium which are of concern: U_{234}, which is 0.0055% in Natural Uranium and 0.0008% in DU, U_{236} which does not occur in Natural Uranium and was found present at 0.003% in the DU used in Yugoslavia. The presence of U_{236} in DU indicates that the ore from which the DU was extracted may have been from uranium obtained through chemical reprocessing of spent nuclear fuel rods, rather than from natural uranium. Such DU will contain traces of transuranics, including plutonium, americium and neptunium. Both of these uranium isotopes are alpha emitters.
Specific Activity: The effectiveness of uranium for cell mutation and cell killing depends on whether the uranium is inside or outside of the body. In both natural and depleted uranium, the isotope U_{238} predominates: 99.2745% in natural uranium, and 99.7947% in depleted uranium. Given the same amount of concentrated uranium, the specific activity of the depleted form is approximately 60% of the specific activity natural form. This means that DU has about 60% as many nuclear transformations, each emitting an alpha particle, than does natural uranium.

Along with the alpha and beta particles released by uranium and its progeny in nuclear transformations, there is also a gamma release of 1.775 MeV. [Ref. 9].

DU, because of its concentration, is orders of magnitude more radioactive that is natural soil containing

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natural uranium, and must be handled by persons with special training in handling radioactive materials. The physical half-life of U_{238}, is 4.51 billion years.

One microgram of pure U_{238} has 12.4 atomic transformations (sub-microscopic explosions) every second, each giving off one alpha particle with energy between 4.15 and 4.2 MeV [million electron volts]. It only requires 6 to 10 eV [electron volts] to break the DNA strand in a cell. [Ref 10.] In one day, one microgram of DU would release 1,071,000 alpha particles, each with more than four million electron volts of energy; into whatever organ or tissue it was lodged. These alpha particle emissions impact a sphere with radius of about 7 cells. To assume that no harm is done to tissues and cells is ridiculous! To limit concern, as ICRP does, to damage resulting in a fatal cancer ten or twenty years from now is equally ridiculous. It should be obvious that DU is a significant hazard when inside of the human body, especially when the biological half time within the body is long.

Cancer, while not the only effect of cellular bombardment with alpha particles, is clearly one effect. The International Agency for Research on Cancer (IARC) has identified «internally deposited radionuclides that emit alpha particles» as Group I carcinogens, meaning substances known to cause cancer in humans.

1|14O (cont)

«Particle-emitting radionuclides:
«Lifetime studies of the carcinogenicity of pure and mixed particle-emitting radionuclides have been conducted in experimental animals of a number of species and strains that differ greatly in features such as size, metabolic characteristics and lifespan. The locations and types of tumours observed were influenced by factors including species, the form and route of administration, the resulting metabolic and dose patterns and the age and health status of the animals. Alpha particles have a short range of penetration in biological tissues, and tumours developed at the sites of radionuclide deposition.» [Ref 11.]

Uranium and Ill Health: Uranium was discovered in 1798, and its toxicity has been known since 1850. During the Manhattan Project extensive animal experiments were undertaken, documenting the kidney, respiratory and reproductive system effects. [Ref. 12.] Tests for uranium exposure of humans include lung scans, whole body scans (these are not very effective for alpha particles), feces analysis (for uranium not absorbed through the gut) and urine analysis for uranium absorbed into the body. http://www.iicph.com/docs/du_update_1_3.htm

«After some time, all air-borne particles fall slowly down and settle on grass and vegetables, fruit or expanses of water where they become inevitably a guest of food and drink to animals and [people] alike. Even if the unwanted presence is known in advance - but very often it is utterly ignored - getting rid completely of inorganic particles can be very difficult».[Ref 2.].
Particles of one nanometer in diameter, can float in air indefinitely due to Brownian action or thermal motion of its molecules. How far it travels will depend on wind, air currents, and obstacles in its path. [Ref 3.].

Professor Gatti participated in the investigation, after the war in the Balkans, sponsored by UNEP (The United Nations Environment Program) [Ref 4.]. The diseased tissues of soldiers and civilians affected by the war in the Balkans, was submitted to Dr. Gatti for analysis. The soldiers, who served in the former Yugoslavian Territory, had an unusually high incidence of Hodgkin's and non-Hodgkin's lymphomas. The civilians, and staffs of the Humanitarian Missions, were suffering from the same diseases. Moreover, the Head of the Pediatric Clinic of Sarajevo, Professor Edo Hasanbegovich, reported an increase of leukemia among children, especially in towns located close to the Croatian border.

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Although many strict followers of the ICRP methodology protested that there was not sufficient latency period for these cancers to be radiation related, they failed to consider the classic paper on the formation of clonal tumors, by Peter C. Nowell. Radiation can initiate cancers, and also promote cancers which are hereditary or have been initiated by some other carcinogen. Promotion of cancers already initiated requires no latency period. This exposition has been strengthened recently through the research into the many stages of cancer development, and genome instability of these various stages after exposure to low doses of ionizing radiation [Ref 5.].

In March of 2000, NATO revealed that DU shells had been used in the Balkans, and in 2001 traces of DU were found by UNEP, not far from Sarajevo, and in several other places in the area. Although the evidence pointed strongly to the DU shells, Dr. Gatti looked for another cause of the problem. She also noted the shared experience of all soldiers serving on firing ranges, with GWS.

By an innovative technique using an electron microscope developed at her Institute, Dr. Gatti examined tissue from Balkan soldiers, Italian Soldiers (exposed on firing ranges) and Yugoslavian residents who were experiencing similar symptoms. Astonishingly, all samples contained micro- and nano- size inorganic particles. She did not find DU or uranium, but that is understandable since samples were of soft tissue and were small.. She reported finding compounds of: iron and selenium; copper, chlorine and zinc; selenium, titanium, iron and aluminum; silicon and bismuth; silicon and lead; iron, copper and zinc; chromium, iron and nickel; iron and manganese, and one sample of zinc alone. These particles had been formed under a very high temperature, as could be determined because of their spherical shape, hollow in the larger sizes. This was compatible with a high temperature caused by a DU fire or a rapid fire friction in a military exercise. They were different from nano particles typically found in those without combat experience.

The focus of Dr. Gatti's research has been solid inorganic particles of sizes one nanometer to 0.1 micron, i.e. ultra-fine particles or metal fumes. According to her:
«Once the debris that size enters the body, be it via the digestive or respiratory system, they can easily negotiate the luminal (cavity of a tubular structure) tissues and either be captured by the tissue itself, which acts as a filter, or be transported by the blood or lymph until they end their journey in some organ (for instance the kidneys and the liver). Lymph nodes, for example, are the organs where lymphoma's start and develop, and where, in all pathological cases checked, we found the presence of inorganic particles. But also the other pathological specimens we had the possibility to observe show clearly and without any single exception the presence of debris» [Ref 6.].

Nano-pathologies are not unknown to the medical profession. For many years physicians have dealt with silicosis, asbestosis, and inflammatory reaction to debris from worn out hip prostheses, and dental fillings. When humans are invaded by micro- and nano-particles which are chemically inert and non-biodegradable, they induce a reaction through which the body tries to defend itself against the invasion. This reaction may become clinically observable. The body's reactions opposing the presence of small-sized foreign particles less than 0.1 micron in diameter, constitutes the focus of a new discipline called Nanopathology. The best known nano-particles are viruses.

The body's reaction to inorganic nano-particles starts with a mild irritation, which, if it becomes chronic, can lead to granulomatosis, a fibrosis and later, in some cases, a cancer. In the pathology of granulomatosis and sarcoidosis, the tissue often (always for granulomatosis) contains minute particles encapsulated, or even within a cell or nucleus, surrounded by inflammatory tissue. In patients suffering from deep vein thrombosis, extremely small particles have been found within the thrombi, with a variety of chemical compositions: talc, barium-sulphate, zirconium compounds, steel, iron, lead or silver compounds, some bound with mercury, tin and copper (composition typical of dental amalgams).

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1|14O (cont) Technically speaking, these compounds, some never seen before, can travel in the blood forever. They are so small that they can avoid the three methods of excretion from the body: feces, sweat and urine. http://www.iicph.com/docs/du_update_2_3.htm

Be a better friend, newshound, and know-it-all with Yahoo! Mobile. Try it now.

Garm, Dolores
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PC_448

Buenaflor, Justin

From: Dolores Garm [dgarmster@gmail.com]
Sent: Friday, March 14, 2008 12:13 PM
To: Complex2030
Subject: Stop Nuclear Arms Development and Manufacturing

Dolores Garm
3070 W Fardale Ave Apt 2
Milwaukee, WI 53221-1265

March 14, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

As a child of the Cold War, I clearly remember heading to the basement for civil defense drills. It was a frequent reminder that we were hostages to the global nuclear threat. A return to those times would mean that we, as a civilization, are regressing rather than progressing.

1|1J The United States is already far ahead of other countries in its nuclear might. Building this new plant would send a contradictory message to other countries, such as Iran, who may be seeking nuclear weapons. While the U.S. is asking others to forego developing nuclear arsenals, we are simultaneously trying to increase our own capacity to build new nuclear weapons. We should consider reducing or simply maintaining our arsenal instead.

Sincerely,

Dolores Garm
414-282-1215

Garrett, Jo
Page 1 of 1

PC_1776

Levens, Matthew

From: joagarrett@surfbest.net
Sent: Friday, April 04, 2008 8:27 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Theodore Wyka, Complex Transformation SPEIS Manager Office of Transformation, NA-10.1 U.S. Department of Energy/NNSA Washington, DC 20585

Dear Mr. Wyka,

Thanks for your part in working to reorganize and reduce the retrograde US nuclear weapons program.

1|1J 2|3A Complex Transformation, however, is counter-productive. The United States cannot hope to be influential in the world-wide effort to quell nuclear proliferation if we continue to maintain thousands of nuclear weapons--far more than are needed to maintain a so-called "nuclear deterrent."

1|1J (cont) "Complex Transformation" is destructive of our nation's efforts to stop the spread of nuclear weapons around the world. It undermines our credit with the rest of the world, in that it is so palpably self-serving and arrogant. We need to confidently demonstrate our own willingness to lead the world in getting rid of nuclear weapons.

3|16A Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE should focus on shrinking the still-oversized nuclear weapons complex and on maintaining the safety and security of our existing weapons arsenal as the size of our nuclear stockpile is reduced.

Sincerely,
Jo Anne Garrett
PO Box 130
Baker, NV 89311

1

Garrison, Ann
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PC_367

Levens, Matthew

From: Ann Garrison [anniegarrison@mac.com]
Sent: Wednesday, March 19, 2008 4:14 PM
To: Complex2030

Complex transformation is the sickest, most twisted idea the human race has come up with to date.

1|16A DON'T DO IT. TIME TO START OVER. CHANGE DIRECTIONS. I AM NOT AFRAID OF ANY TERRORISTS ANYWHERE. I'M AFRAID-- AND DISGUSTED---BY GLOBAL DEPRESSION AND NUCLEAR WEAPONS ESCALATIO.

2|9B 3|7M STOP!!!!!! Try a Complex Transformation on the Department of Energy; turn it into the Solar, Wind, and Tidal Dept., instead of the Department of Nuclear Weapons and Planetary Destruction for No Reason but the Staggering Greed of a Very Tiny Few with More Wealth than Anyone Could Ever Do Anything with Besides Stash in some Secret Swiss Bank Account.

Time to complex transform the entire DOE.

---Ann Garrison

anniegarrison@mac.com
(415) 285-7259
(415) 786-6839

1

Garrity-Roth, Kay
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PC_1752

Levens, Matthew

From: garroth@dejazzd.com
Sent: Sunday, April 06, 2008 10:09 AM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|1J 2|16A 3|3A Hello Folks, "There's an elephant in the middle of the 'Living Room', and everyone is ignoring it! It's not "Horton" it's Nuclear Weapons! We need to acknowledge them publicly and then work toward eliminating them, period!

We don't need new and improved nuclear weapons! We need to purge, obliterate, annihilate existing nuclear weapons, before we annihilate ourselves.

Sincerely,
Kay Garrity-Roth
37 E. Lincoln
Lititz, PA 17543

cc:
Senator Arlen Specter
Representative Joseph Pitts
Senator Bob Casey

1

Garvey, Lydia
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2.16.08 PC_28

Proud Supporter of the Wildlife Land Trust

Lydia Garvey
429 S 24th St.
Clinton, OK 73601

Dear Mr. Wyka,
re Draft SPEIS

I strongly urge you to NIX it- NIX nukes. It's a waste of time, energy & the future. They are highly toxic at every stage. Nukes make our security very not so. There is no military or security need (& waste of tax $) and violates the Nuclear Nonproliferation Treaty. We already have more bombs than we need, can destroy the earth many times over- It's insanity. Do you care about the future?

1|16A 2|14O 3|13A.1 4|9H 5|1C 6|1F 7|3A

Your attention to this most urgent matter would be much appreciated by all present & future generations of all species.

Thank you,
Lydia

Gaskin, Barney
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PC_146

Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement— U.S. Department of Energy National Nuclear Security Administration

Written Comment Form

Must be received on or before April 10, 2008.

1|15A I Fully support this NNSA complex

Barney T. Gaskin

Please use other side if more space is needed.

Comment forms may be mailed to:
Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Comment forms may be faxed to:
(703) 931-9222
or sent by electronic mail to:
complextransformation@nnsa.doe.gov

You may also submit comments through the project website which can be found at:
http://www.complextransformationspeis.com

Gawarecki, Susan
Page 1 of 5

PC_5071

Levens, Matthew

From: Susan Gawarecki [loc@icx.net]
Sent: Thursday, April 10, 2008 3:33 PM
To: Complex2030
Subject: NNSA Draft Complex Transformation SPEIS
Importance: High
Attachments: NNSA SPEIS board ltrhd.doc; NNSA SPEIS CAP ltrhd.doc

5/19/2008

Gawarecki, Susan
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PC_ 5071

LOC INC
Oak Ridge Reservation
Local Oversight Committee

April 8, 2008

Theodore A. Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
US Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Subject: NNSA Draft Complex Transformation SPEIS

Dear Mr. Wyka:

The Citizens' Advisory Panel (CAP) of the Oak Ridge Reservation (ORR) Local Oversight Committee, Inc. (LOC) has reviewed the National Nuclear Security Administration (NNSA) Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement (SPEIS). We approve of the Department of Energy's plans to consolidate and reduce the facilities, workforce, and redundant capabilities within the nation's nuclear weapons complex. The CAP supports the Preferred Alternative for Distributed Centers of Excellence.

The CAP particularly supports NNSA's plans with respect to Oak Ridge's Y-12 National Security Complex, which preserves the core competency of Y-12 and maximizes the consolidation of special nuclear materials. Y-12's mission in support of DOE's weapons complex would be difficult to reproduce elsewhere due to the unique capabilities of the local workforce. We would like to see this mission preserved and a new Uranium Processing Facility built to provide for better worker safety and more secure and efficient methods of handling nuclear weapons for dismantling, refurbishment, or new production. In addition, we strongly support Y-12 continuing to be the nation's repository for highly enriched uranium.

Three issues were noted regarding the presentation of Y-12 in the document:

- Page 4-349, Figure 4.9.1-1 – Combine the caption on the figure with the figure caption below.
- Page 4-373, Figure 4.9.10-3 – The outline of the Oak Ridge Reservation is the same weight/color line as that of the 50-mile radius. Maps on previous pages distinguish between these two outlines. In addition, instead of outlining the entire ORR, it would be more meaningful to give the boundaries of the Y-12 National Security Complex.
- Page 12-12 – The reference DOE 2007 appears to be in error. The Final Y-12 SWEIS (DOE/EIS-0309), September 2001, is correctly cited on page 12-10 as DOE2001a. The ROD was signed 2/4/2002. If this is a new, unreleased version for Y-12, it should have a new document number.

The CAP offers the following comments to improve the readability of the SPEIS:

- The document's heavy reliance on acronyms increases the difficulty of understanding. Also, not all acronyms used were defined in the acronym list for the Summary document (page S-iv).

102 Robertsville Rd., Suite B • Oak Ridge • TN 37830 • Phone (865) 483-1333 • Fax (865) 482-6572 • loc@icx.net

Gawarecki, Susan
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- A matrix of alternatives and sub-options would assist the reader and could be added to the existing Figures 3.1-1 and 3.1-2 (S.3.1-1 and S.3.1-2 in the Summary). Alternatively, a "roadmap with timeframe" would help the understanding of the selected alternatives in the Final SPEIS.

Thank you for the opportunity to comment on this important matter of modernizing and consolidating our national weapons complex.

Sincerely,

s/Norman A. Mulvenon

Norman A. Mulvenon
Chair, LOC Citizens' Advisory Panel

cc: LOC Document Register
LOC Board
LOC CAP
Thomas D'Agostino, NNSA Administrator
Samuel Bodman, Secretary of Energy
Ted Sherry, YSO Site Manager
Gerald Boyd, Manager, DOE ORO
John Owsley, Director, TDEC DOE-O
Pat Halsey, FFA Coordinator, DOE ORO EM
Senator Lamar Alexander
Senator Bob Corker
Representative Zach Wamp
Representative John J. Duncan, Jr.
Representative Lincoln Davis

Gawarecki, Susan
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LOC INC
Oak Ridge Reservation
Local Oversight Committee

April 9, 2008

Theodore A. Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
US Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Subject: NNSA Draft Complex Transformation SPEIS

Dear Mr. Wyka:

The Oak Ridge Reservation Local Oversight Committee, Inc. (LOC) has reviewed the National Nuclear Security Administration (NNSA) Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement (SPEIS). Our comments are specific to the impact of the decision on the Oak Ridge Reservation's Y-12 National Security Complex.

1|15A;

2|5C

The mission that Y-12 performs in support of DOE's weapons complex would be difficult to reproduce elsewhere due to the unique capabilities of the workforce in Oak Ridge. The LOC has long supported the mission of Y-12. We would like to see this mission preserved and a new Uranium Processing Facility built to provide for better worker safety and more secure and efficient methods of handling nuclear weapons for dismantling, refurbishment, or new production. In addition, we strongly support Y-12 continuing to be the nation's repository for highly enriched uranium.

Consequently, the LOC supports the Preferred Alternative for Y-12 under the Distributed Centers of Excellence alternative, which preserves Y-12's core competency and maximizes the consolidation of special nuclear materials.

Thank you for the opportunity to comment on this important matter of modernizing and consolidating our national weapons complex.

Sincerely,

s/Ellen D. Smith

Ellen D. Smith
Chair, LOC Board of Directors

The Oak Ridge Reservation Local Oversight Committee, Inc. (LOC) is a non-profit regional organization that reflects the interests of local communities regarding DOE's environmental management program and the operation of the Oak Ridge Reservation. The Board of Directors of the LOC is composed of the County Mayors of the seven counties surrounding or downstream of the Oak Ridge Reservation (representing over 600,000 residents), the Mayor of the City of Oak Ridge, the chairs of environmental boards for Oak Ridge and Roane County, and the chair of the LOC's Citizens' Advisory Panel (CAP). The CAP makes recommendations to the LOC board, the DOE, and state and federal regulators on technical and other matters of concern to local stakeholders.

~~102 Robertsville Rd., Suite B • Oak Ridge • TN 37830 • Phone (865) 483-1233 • Fax (865) 482-6572 • loc@icx.net~~

Gawarecki, Susan
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T. Wyka
04/09/08
Page 2 of 2

PC_ 5071

Distribution:

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Senator Lamar Alexander
Senator Bob Corker
Representative Zach Wamp
Representative John J. Duncan, Jr.
Representative Lincoln Davis

Gay, Nancy

Page 1 of 1

PC_1168

Levens, Matthew

From: nancy gay [ngay@columbus.com]
Sent: Thursday, March 27, 2008 4:37 PM
To: Complex2030
Subject: administration's poposal to build a plant to produce plutonium pits for nuclear weapons

nancy gay
4476 sellers ave.
columbus, OH 43214-2748

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

2|1J I am also opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal. I am a progressive christian interested in justice and peace for all. Remember the words of Peter, Paul and Mary's song about freedom.

Sincerely,

nancy gay
614-267-6418

1

Geissmann, Jon

Page 1 of 1

PC_1592

Levens, Matthew

From: clovis@earthtones.com
Sent: Saturday, April 05, 2008 4:32 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

The DOE's plan to reduce & simplify the US nuclear-weapons infrastructure is a step in the right direction. But it entails no change in the US commitment to these horrific, vastly expensive, and ultimately useless weapons.

1|1F Our nation has never followed through on the promise of the Anti-Proliferation Treaty, namely, that the nuclear-power states would cooperatively dismantle their arsenals. It is high time for the US to exercise some constructive leadership in this crucial area; otherwise, we have no right to tell other countries not to create their own nuclear
2|1J deterrent.

Sincerely,
Jon Christopher Geissmann
934A Ramona Avenue
Albany, CA 94706

cc:
Senator Dianne Feinstein
Senator Barbara Boxer
Representative Barbara Lee

1

Gerhan, David
Page 1 of 1

PC_483

Buenaflor, Justin

From: Gerhan, David [gerhand@union.edu]
Sent: Saturday, February 23, 2008 4:12 PM
To: Complex2030
Subject: Draft Complex Transformation SPEIS Comments

To the Department of Energy:

1|16A; 2|9B We do not need more nuclear weapons. A recent poll by World Public Opinion revealed that the majority of United States citizens want the U.S. to do more to eliminate nuclear weapons. The Department of Energy should be putting their resources into nuclear cleanup and "green" energy research.

3|14K 4|5C.1 We have plenty of weapons. The elite scientific advisory group JASON states that the current U.S. nuclear stockpile will remain reliable for at least another 70 years. We, who live in the Capital District and have witnessed the prolonged cleanup process from radioactive weapons production at NL Industries in Colonie, are speaking up against more nuclear weapons. There are unresolved issues around nuclear waste storage, employee safety and compensation. Popular will is for reducing nuclear weapons. It doesn't make sense for U.S. taxpayers to invest in a new generation of nuclear weapons facilities.

Sincerely,

David Gerhan

22 Bruce Street

Scotia, NY 12302

518-374-2166

1

Gerlach, Elizabeth
Page 1 of 1

PC_1743

Levens, Matthew

From: Elizabeth B. Gerlach [ebg17e@msn.com]
Sent: Friday, March 28, 2008 10:59 PM
To: Complex2030
Subject: We should be working toward nuclear disarmament, not new nuclear weapons.

Elizabeth B. Gerlach
101 Manchester Rd.
Newton, MA 02461-1132

March 28, 2008

Complex Transformation

Dear Complex Transformation:

1|16A I am a peace-seeking American citizen, a resident of Massachusetts, a voter and tax payer who has opposed our development and use of nuclear weapons since 1945 and am opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal.

2|9B We should spend the billions proposed for this plan on programs to eliminate nuclear weapons in all countries.

As the Schultz/Perry/Kissinger/Nunn opinion piece in the Wall Street Journal in January 2008 stated: "We endorse setting the goal of a world free of nuclear weapons and working energetically on the actions required to achieve that goal..."

3|1F 1|16A cont. We encourage our government to follow the five strategies toward universal compliance recommended by a 2005 Carnegie Endowment for International Security report. Those five strategies are to 1) make sure there are no new nuclear weapon states; 2) secure all nuclear materials; 3) stop illegal transfers; 4) devalue the political and military currency of nuclear weapons; and 5) commit to conflict resolution.

4|1J I urge your opposition to 'Complex Transformation' and your firm commitment to our moral and legal obligation to achieve nuclear disarmament.

Sincerely,

Elizabeth B. Gerlach

1

Gibbons, Jim
Page 1 of 3

PC_1950

Levens, Matthew

From: Craig Hulse [craig@nevadadc.org]
Sent: Thursday, April 10, 2008 10:04 AM
To: Complex2030
Cc: 'Ryan McGinness'

Attachments: ttr1.pdf

ttr1.pdf (56 KB)

Please find attached comments from Governor Gibbons in reference to the Supplemental Programmatic Environmental Impact Statement (SPEIS).

Craig Hulse

State of Nevada

Washington, D.C. Office

202-624-5406 direct

craig@nevadadc.org

1

Gibbons, Jim
Page 2 of 3

PC_1950

Office of the Governor

JIM GIBBONS
GOVERNOR

April 10, 2008

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager,
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, D.C. 20585

Dear Mr. Wyka:

I appreciate the opportunity to comment on the National Nuclear Security Administration's recently issued Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement (SPEIS) (DOE/EIS-0236-S4), which included a recommendation to move Flight Test Operations out of the Tonopah Test Range (TTR) in Tonopah, Nevada, to the White Sands Missile Range in New Mexico.

1|6C; 2|14I

As you know, the NNSA considered five options as part of the SPEIS for the disposition of the Tonopah Test Range and its Flight Test Operations. Three of the five options would have kept those operations at the TTR in some capacity, another would have moved the operations south to the Nevada Test Site; the NNSA's selection of the fifth option, which moves them out of the State of Nevada entirely, would have devastating economic implications to the city of Tonopah, its residents and its future vitality.

3|10E; 4|18C; 1|6C (cont.)

The city of Tonopah is a small rural community with a current population of approximately 2,800 people. The loss of these operations would mean a loss of employment for over 10% of the city's population, cutting nearly $157 million from an already small local economy.

3|10E(cont); 5|18B; 2|14I (cont.); 1|6C (cont.)

The closure of TTR operations at Tonopah would have a ripple effect that goes well beyond the NNSA's footprint in this rural community. Spouses of NNSA employees who currently work in Tonopah may have no choice other than move to find new work, exacerbating the already massive job loss that would be caused by the relocation of NNSA's Flight Test Operations.

101 N. Carson Street • Carson City, Nevada 89701 • Telephone: (775) 684-5670 • Fax: (775) 684-5683
555 E. Washington Avenue, Suite 5100 • Las Vegas, Nevada 89101 • Telephone: (702) 486-2500 • Fax: (702) 486-2505

Gibbons, Jim
Page 3 of 3

Mr. Theodore Wyka
April 10, 2008
Page 2 of 2

PC_1950

1|6C (cont.); 2|14I (cont.) As Governor, I recognize the importance of considered government streamlining, and appreciate the core intent of the NNSA's efforts. However, when a decision can decimate an entire community that has supported the presence and mission of the NNSA, simple raw data and cost savings can not be the only basis for a decision.

1|6C (cont.) I must oppose the NNSA's decision to remove the Flight Test Operations out of the Tonopah Test Range and ask that you consider the devastating impact of your decision on this vital Nevada community.

Sincerely,

JIM GIBBONS
Governor

/rm

Gifford, Grace
Page 1 of 1

PC_1933

Levens, Matthew

From: brfherb@aol.com
Sent: Monday, April 28, 2008 9:50 AM
To: Complex2030
Subject: Public Comment: Complex Transformation

U.S. Department of Energy
Washington, DC

Dear Department of Energy Staff,

1|16A 2|1F 3|9H I am writing you today to give my comments about the Complex Transformation proposal. The prospect of nuclear war is one that should not be promoted by any government, especially not our government. As an international leader, we should be modeling a message of nonproliferation. To reduce nuclear danger, our focus should be on adherence to the Non-Proliferation Treaty and renouncing nuclear weapons. My tax dollars should be used to prevent the spread of nuclear threat, and the potential for the spread of nuclear fallout.

Grace Gifford
2380 Ole King Street
Conway, SC 29526
843-365-6654
brfherb@aol.com

Plan your next roadtrip with MapQuest.com: America's #1 Mapping Site.

5/19/2008

Gifford, Grace

Page 1 of 1

PC_890

Levens, Matthew

From: Grace Gifford [brfherb@aol.com]
Sent: Thursday, March 27, 2008 10:05 PM
To: Complex2030
Subject: Nuclear Weapons

Grace Gifford
2380 Ole King St.
Conway, SC 29526-5312

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A 2|1B I oppose the administration's proposal to build any infrastructure to support the development of nuclear weapons. My government should address peaceful prevention of conflict, rather than developing new weapons. No nuclear facilities should be refitted to develop nuclear weapons.

3|14K Here in South Carolina we already suffer leukemia and cancer rates downriver from the Savannah Nuclear Plant. There are no benefits to the citizens of this state as we are subjected to increased health risks. The wellbeing of the State's residents and the capacity of our healthcare system have been compromised already.

1|16A (cont) 4|1J I request that such irresponsible plans to build nuclear weapons be ended, and that efforts continue worldwide to end the threat of nuclear war.

Sincerely,

Grace Gifford
843-365-6654

1

Gilbert, Kay

Page 1 of 1

PC_484

Buenaflor, Justin

From: gilbert2@llnl.gov
Sent: Monday, April 07, 2008 11:38 AM
To: Complex2030
Subject: centralized locations means terrorist have concentrated targets

I feel the "Complex Transformation" plan is too enabling for terrorists.

1| 13A.1 A streamlined and efficient foot print, to manage our sensative materials, makes economic sense for terrorists. Radicals will expend much less effort to capture the concentrated targets, to control the strategic strengths of their self-proclaimed enemies. How would we regain our strengths--from our aging pool of retirees to voluntarily rebuild what we had at mothballed sites?

Arguing for continued decentralized research sites with sensative materials:

With geographically separate, functional work sites, we ensure the enemy can never disemplower our technologies, our scientific pool of experts scattered all across this nation, and our ability to rebound just as the patriots of the American Revolutionary War proved.

Terrorists don't represent a Cold War threat, but having a 'back up plan nested in many regions' seems to serve the terrorists very well (i.e. Iraq, Iran, Afghanistan, Syria...). We can add their strategy to our U.S. security initiatives and ensure strength against their clandestine activities.

A bird in the hand is worth two in the bush,

Kay Gilbert

1

Gilbert, Kristina
Page 1 of 1

PC_315

KRISTINA GILBERT
552 SKIFF CIRCLE
REDWOOD CITY, CA 94065-1142

March 27, 2008

Theodore A Wyka
Complex 2030 SEIS Document Manager
Office of Transformation, U.S. Department of Energy, NA-10.1
1000 Independence Avenue, SW.
Washington, DC 20585

Re: Reject "Complex Transformation" plan to build nuclear weapons

Dear Theodore Wyka:

The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal.

1|9H Complex Transformation is expected to cost upward of $150 billion and is a waste of taxpayer money. Revamping
2|14O the current arsenal could also lead to renewed nuclear testsComplex Transformation would be environmentally hazardous. Under the proposal, the DOE proposes increasing the number of plutonium pits we can produce in a year.
3|7J Instead of creating more radioactive contamination, the DOE should clean up its mess from past production of
4|9B nuclear weapons.

5|1J The new arsenal would also be bad foreign policy. We need American leadership in convincing countries like Iran and North Korea to forgo nuclear weapons.

THANK YOU

By building up its nuclear arsenal right now, the US is essentially telling the world, "Do as I say, not as I do."

Sincerely,

KRISTINA GILBERT
650-592-4989

Gilchrist, Pamela
Page 1 of 1

APR/28/2008/TUE 12:54 PM GHOST RANCH SANTA FE FAX No. 505-988-1917 P 001/001

April 28, 2008

PC_939

Mr. Theodore Wyka
C-T SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Re: Public Comment to the draft Complex Transformation Supplemental Programmatic Environmental Impact Statement, DOE/EIS-0236-S4

Dear Mr. Wyka,

1|2E The DOE draft environmental impact statement is not accurate. A 90-day extension of the comment period is imperative to provide informed public comments to DOE.

2|14A For example, DOE misspeaks when they state "there are no agricultural activities present at LANL, nor are there any prime farmlands in the vicinity." (For DOE, a "vicinity" or "region of influence" is generally an area within a 50-mile radius of its facility). Before the Atomic Energy Commission arrived on the Pajarito Plateau in 1943 all this land was prime farmland. LANL is located within the food basket of Northern New Mexico. **Our Santa Fe Farmer's Market, supported by many farmers within a 50-mile radius of LANL, is one of the largest in the nation!**

3|11A DOE must retract the draft Complex Transformation Supplemental Programmatic
4|2B Environmental Impact Statement and reassess the LANL impacts to agriculture. Then DOE must submit the revised draft to the public for review and public comment.

Sincerely,

The Rev. Pamela Gilchrist
1909 Proctor Court
Santa Fe, NM 87505

cc: Senator Pete Domenici at (505) 988-6511, fax (505) 988-6514
Senator Jeff Bingaman at (505) 988-6647, fax (505) 992-8435
Representative Tom Udall at (866) 618-3255, (202) 225-6190, fax (202) 226-1331
Representative Heather Wilson at (505) 346-6781, fax (505) 346-6723
Representative Steve Pearce at (505) 522-2219, fax (505) 522-3099
Governor Bill Richardson at (505) 476-2200, fax 505) 476-2226
President Pro Tempore Tim Jennings at (575) 623-8331, fax (575) 623-9378
House Speaker Ben Lujan at ben.lujan@nmlegis.gov

Gilchrist, Sister Francis
Page 1 of 1

PC_500

Buenaflor, Justin

From: Hillary Clinton [senator@clinton.senate.gov]
Sent: Friday, March 21, 2008 10:21 AM
To: Complex2030
Subject: nuclear weapons

Hillary Clinton
476 Russell Senate Building
Washington, DC 20510-0001

March 21, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

I clearly oppose the development of new nuclear weapons.

1|16A; 2|1J I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

I am also opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal.

I do not want to leave a legacy of nuclear weapons to my grandnieces and grandnephews

Sincerely,

sister Francis Anne Gilchrist

1

Gilfert, Sara
Page 1 of 1

PC_1851

Levens, Matthew

From: Sara Gilfert [gilfert37@gmail.com]
Sent: Friday, March 28, 2008 10:47 AM
To: Complex2030
Subject: "NO" to new nuclear weapons

Sara Gilfert
37 Sunset Dr.
Athens, OH 45701-1610

March 28, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I am a retired art instructor and a mother and grandmother in southeastern Ohio. I feel strongly against building up a nuclear arsenal in this country - or ANY country. I want my grandchildren to live in a world without war. Nuclear and/or other weapons systems (like land mines)are bad for the health of my progeny.

2|1J We are asking other countries not to build nuclear arsenals, yet there is a new proposal in Congress (CMRR) to increase our own capacity to build nuclear weapons. Let us use reason! It does not work that way. Responsible government means to refrain from doing what we urge others not to do. I want the USA to return to responsible government.

Please defeat this and any proposal by the administration to increase our capacity to build nuclear weapons.

Sincerely,

Sara Gilfert
740-593-7645

1

Giller, Catherine

Page 1 of 1

PC_339

P.O. Box 68
Comer GA 30629
3/26/08

Dear Mr. Wyka,

I am writing to you regarding the NNSA plan for complex transformation at Oak Ridge TN. I am opposed to this plan for many reasons. It seems the cold war is over and with it the need to stockpile nuclear weapons. Do we really need to upgrade our bombs + weapons. Haven't we learned in the last 2 decades that if we bomb our neighbors it is if we our bombing ourselves. There is only one world and it is very small when we see how the pollution of just a few countries can affect the rest of the world.

1|3A

2|16A

We certainly could use the money to feed people or give health care and education to people. It seems if we spent the money there we wouldn't need to build so many prisons – but that's a letter for someone else –

3|9B

Thank you for your time
Sincerely
Catherine Giller

Gilner, Sydney

Page 1 of 1

PC_1676

Levens, Matthew

From: sgilner@sbcglobal.net
Sent: Saturday, April 05, 2008 5:53 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|3A
2|16A
3|9B
please, no new nuclear weapons. we already have enough to blow-up the entire planet. make the department of energy spend our money on green energy not new bombs.

Sincerely,
sydney gilner
4210 via arbolada #321
los angeles, CA 90042

cc:
Senator Dianne Feinstein
Senator Barbara Boxer
Representative Xavier Becerra

1

Ginsberg, Pruit

Page 1 of 1

PC_1991

Buenaflor, Delight

From: Pruit Ginsberg [pruitg@aol.com]
Sent: Thursday, April 10, 2008 7:34 PM
To: DIV.Complex.Transformation

Your form does not transmit when I hit send.

1|9B
2|9C
3|18B The NNSA consolidation plan completely ignores the fact that there is no money to carry out the plan and builds on the destruction of the National Labs started with the handing the contracts to private contractors (LANS, etc). Huge expenditures will be required to implement this ill thought plan, mostly to replace already existing facilities. Accompanying this construction will be the normal DOE cost overruns and delays, which have not been included in the costs. Meanwhile, it will be very difficult to attract highly talented individuals that are badly needed at our Labs, due to the lack of technical activity. We are at a crossroads here, we will have a competent national defense or we will let it wither away. The NNSA/DOE does not have the internal capability and competence to tell its labs what to do and will fail as it trys.

Givers, David

Page 1 of 1

PC_1963

Levens, Matthew

From: dgivers@gomoorhead.com
Sent: Thursday, April 10, 2008 11:47 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|3A;
2|16A We have over 6,000 nuclear weapons too many. We don't need more nor do we need to replace our arsenal with a new technology. We need peace not a war that annihilates us and most of the life on Earth.

3|1J Complex Transformation will increase nuclear proliferation. It violates the Comprehensive Test Ban Treaty.

4|11B An increase in the nuclear weapons complex must be preceded by a comprehensive analysis and re-evaluation of the role of nuclear weapons in the life of Earth. That review needs to be done by the president and the Department of Defense, not the DOE.

I ask that you include my comment as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project.
Thank you.

Sincerely,
David Givers
205 6th Ave So
Moorhead, MN 56560

cc:
Representative Collin Peterson
Senator Norm Coleman
Senator Amy Klobuchar

1

Gjelsvik, Carol
Page 1 of 1

PC_833

Levens, Matthew

From: Carol Gjelsvik [cgjelsvik@cox.net]
Sent: Thursday, March 27, 2008 3:07 PM
To: Complex2030
Subject: nuclear disarmament now

Carol Gjelsvik
30 Cecil Ave
North Kingstown, RI 02852-6812

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A; 2|1J I strongly oppose all nuclear weapons and think the US should become a leader in disarmament. How can we tell others to disarm, or that they can't have nuclear power, for example, when we continue to develop new and more horrible weapons.

Sincerely,

Carol Gjelsvik
401-2295-0855

Gloe, Janice
Page 1 of 1

PC_518

Buenaflor, Justin

From: Janice Gloe [rainglo@msn.com]
Sent: Thursday, March 20, 2008 8:38 PM
To: Complex2030
Subject: STOP NUCLEAR WEAPONS DEVELOPMENT!!!!!

Janice Gloe
3100 Guido Street
Oakland, CA 94602-3521

March 20, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I strongly oppose plans to modify,
or build any new nuclear weapons.
I oppose the administration's proposal
to produce plutonium pits for nuclear weapons.
We don't need any more weapons
of mass destruction.
We need to destroy our nuclear weapons and be a leader in the world and a good example other countries will follow.

2|8A Congress needs to keep defunding
the Reliable Replacement Warhead
mega-scale bomb plant.

3|9B Lets use all that money for basics for
the American People. We are
not in good shape. How about some
help with healthcare, infrastructure,
housing for homeless, care for
veterans, education and the like.
Also to help the people in Iraq who
are displaced and who do not have
electricity, water and basics in their
lives.

PLEASE, LETS CHANGE OUR WAYS
AND BE AN EXAMPLE FOR PEACE IN THIS WORLD! WE ARE A WONDERFUL COUNTRY, LET'S BE POSITIVE AND PEACEFUL!

Sincerely,

Janice Gloe

1

Gluck, Simon
Page 1 of 1

PC_1858

Levens, Matthew

From: Simon Gluck [sgluck001@comcast.net]
Sent: Friday, March 28, 2008 3:49 PM
To: Complex2030
Subject: No to Nuclear

Simon Gluck
3300 Darby Road
Haverford, PA 19041-1061

March 28, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

16A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

Sincerely,

Simon Gluck
610-649-6339

1

Goergen, Mary
Page 1 of 1

PC_206

1001 14th St. NW, Suite 100
Rochester, MN 55901
March 8, 2008

Theodore A. Wyka
Complex Transformation
SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Wyka,

The use of words by our government for war and its wages is very confusing to the average American. It seems that deception is the name of the game. Collateral Damage names the lives of the people and their homeland that are being destroyed in war. Why do we never hear about the number of lives of the people of Afghanistan and Iraq that have been lost and the property and infra structure damage that has and continues to occur in those countries. Is there fear that the American people will stand up and cry, "No Longer in our name will you do this!"

1|14O Now Complex Transformation, which in religious circle refers to a change of mind and heart for good, is being used to name a change to more destructive weaponry. Where will we use it? What will is do the atmosphere, the waters, the land and the people on who it is used? When will the consciences of the builders and planners cry out, "No longer in our name will this be done!"

2|1J In our heart of hearts we each know that the only way that threats to our person or country will be changed is by a change of attitude about the peoples we call enemy. The diplomatic endeavors for peace have given way to nuclear strikes. We have become a country entrenched in fear because our leaders are afraid to make moves for peace before threatening war. Our leaders have become entrenched in the system that believes that our economy will collapse without the weapons industry. So we build bigger and more destructive weapons which others in turn have to build to defend themselves against our threat to them.

3|1F; 4|7C; 2|1J (cont); 5|16A We continue to stockpile weapons that we tell other countries they have no right to build and if they do we will use ours against them. When will we teach others by our example? Let's honor the Nuclear Non-Proliferation Treaty and beginning to dismantle our nuclear stockpile.

4|7C (cont.) Please add my voice to those who say "No," to bigger and better weapons. Let us become a country that again joins other countries in pursuit of World Peace and Justice for All Peoples. Let us become a country who hears the cry of the weak and poor of the 3rd world and who does not support exploitation of their resources. Let us become a country who does its part to curb global warming. Let us become a country that begins to dismantle of nuclear weapons rather than endeavoring to build more with more destructive ability.

Peace to Your Heart! May the peace in your heart be a catalyst for peace in your family, community, country and world.

Sister Mary Goergen, osf

Sister Mary Goergen, osf

Gold, Jeremy
Page 1 of 1

PC_935

Jeremy Gold
4403-B Catlin Cir.
Carpinteria, CA 93013

April 11, 2008

Theodore A. Wyka
Complex Transformation SEIS Document Manager
c/o Peace Education Fund
2800 Adeline St.
Berkeley, CA 94703

Dear Mr. Wyka,

1|16A
2|5C.1
3|9B
The DOE should definitely reject the Complex Transformation proposal to revamp the nuclear weapons arsenal. An independent panel of scientific experts recently certified that the current arsenal has a lifetime of 85 to 100 years. Complex Transformation is expected to cost upwards of $150 billion. Wouldn't our planet be better served spending this money on education, health or other humanitarian efforts?

4|1J
Creating a new nuclear arsenal also sends the wrong message to the rest of the world. By building up our stock of nukes, we're essentially saying to countries like Iran and North Korea and Pakistan that this is the correct road to take. This is the correct method of attaining national goals and world peace: create more modern nuclear bombs!

Thank you for hearing me.

Sincerely,

Jeremy Gold

Goncharoff, Nicholas
Page 1 of 1

PC_1824

Levens, Matthew

From: nicko.goncharoff@gmail.com
Sent: Sunday, April 06, 2008 11:36 AM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|16A As a taxpayer, I believe the Complex Transformation puts far too much emphasis on re-creating the unnecessary capability to research, develop, and manufacture new types of nuclear weapons.
We simply do not need the capability to make more or newer nuclear weapons.

2|1F In addition, Complex Transformation undermines U.S. efforts to stop the spread of nuclear weapons around the world. It violates the spirit and letter of the Comprehensive Test Ban Treaty and sends the wrong message to the world --that obtaining nuclear weapons will increase security.

I ask that you include my comment as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project.
Thank you.

Sincerely,
Nicholas Goncharoff
2710 Cabrillo St, Apt 202
San Francisco, CA 94121

cc:
Senator Dianne Feinstein
Senator Barbara Boxer
Representative Nancy Pelosi

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Gondeck, Mary

Page 1 of 1

PC_1465

Levens, Matthew

From: Mary Ellen Gondeck [MGondeck@csjoseph.org]
Sent: Tuesday, April 08, 2008 3:59 PM
To: Complex2030
Subject: Proposed "ComplexTransformation" Plan

April 8, 2008

Theodore Wyka, Complex Transformation SPIES Document Mgr.
Department of Energy
1000 Independence Ave. SW
Washington, DC 20585

Dear Mr. Wyka,

This letter comes with a great deal of concern about the proposed "Complex Transformation".

1|1J; 2|3A In a world where our national security is of greatest importance, it doesn't seem logical for us to engage in a process which will raise even higher the concerns of our neighbors throughout the world. We currently have sufficient nuclear weapons with a life expectancy of over 100 years and capable of destroying the earth and all life on it several times over.

3|1F Additionally it is illegal in that it violates the Nuclear Non-Proliferation Treaty, to which the U.S. is a signatory, making it U.S. law.

4|16A Even more importantly from a country that is based on Christian principles, it is immoral to contemplate, plan for, create the means of massive destruction of all life and hold the world hostage to that threat through U.S. domination. The expense of continuing to build nuclear weapons robs the human family of sustenance and survival.

For these and other reasons, I would ask that you abandon this plan.

Thank you for listening to my concerns.

Peace,

Mary Ellen Gondeck

Mary Ellen Gondeck, CSJ
Congregation of St. Joseph
Office of Peace and Justice
975 E. Gardenia
Madison Heights, MI 48071
248-541-3094 (phone)
248-414-3627 (fax)

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Gonzalez, Joanna

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Page 1 of 1

PC_1387

Levens, Matthew

From: Joanna Gonzales [jojo28.glez@gmail.com]
Sent: Tuesday, April 29, 2008 12:03 PM
To: Complex2030
Subject: Fence to Fence Clean Up

Dear Mr. Wyka,

1|4A 2|1C The Citizens of New Mexico need time to bring the important question of the proposed Complex Transformation to our Legislators. The "No Action Alternative" is the only respectful option to follow at this time. It is important for our political leaders to be involved, and to be in favour of such an important undertaking. Congressional races are up for elections and the outcome will instate a new political landscape in New Mexico. A new President will write a new Nuclear Posture Review. It is very unwise for the National Nuclean Security Administration to do a project of such magnitude at such an unstable time in our politics, environment and economy.

3|7J The only "Action Alternative" that will benefit the well-being and safety of the citizens of New Mexico, and the one that the future generations whole-heartedly support is the "Fence to Fence Clean Up". This is the "Action Alternative" requested by the New Mexico Environment Department. Please respect the rights of "Life, Liberty, and Pursuit of Happiness" of our future generations.

Sincerely,

Joanna Gonzalez

5/16/2008

Goodman, Bob

Page 1 of 1

PC_825

Levens, Matthew

From: Bob Goodman [bobgoodman1@bellsouth.com]
Sent: Saturday, March 29, 2008 5:41 PM
To: Complex2030
Subject: Nukes

Bob Goodman
2302 Dancing Fox Rd.
Decatur, GA 30032-7418

March 29, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A
2|3A No more nukes. Stop this madness!

Sincerely,

Bob Goodman
404-378-5424

1

Goodrich, Barbara

Page 1 of 1

PC_1580

Levens, Matthew

From: bgoodric@comcast.net
Sent: Saturday, April 05, 2008 8:13 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|13A1 More and newer nuclear weapons do not improve the U.S.'s safety or the world's safety; they worsen it. Please oppose the Department of Energy's planned expansion, and support consolidating, limiting, securing, and ultimately dismantling our current nuclear weapons.

Sincerely,
Barbara Goodrich
815 Ninth Street
Golden, CO 80401

cc:
Senator Wayne Allard
Representative Ed Perlmutter
Senator Ken Salazar

1

Goodson, Elizabeth

Page 1 of 1

PC_507b

Buenaflor, Delight

From: Liz Goodson [goodsonliz@comcast.net]
Sent: Tuesday, April 01, 2008 8:45 PM
To: DIV.Complex.Transformation
Cc: Liz Goodson
Subject: comment on SPEIS at SRS

The environmental effects of the many facilities on the Savannah River Site need to be studied by independent ecologists. Studies by the Savannah River Ecology Laboratory have in the past provided an independent analysis of the cumulative effects of the many different programs on the site. DOE's recent dramatic cuts in environmental research make it very uncertain that in the future the most relevant facts will be made public. How will long term environmental studies be maintained? Who is assuring that the valuable environmental data bases are available? How is environmental impact recognition coordinated?

1|11D
2|14 O

Elizabeth Goodson

382 Ponderosa Rd., Waynesboro GA 30830

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Goodwin, Suzanne

Page 1 of 1

PC_1658

Levens, Matthew

From: normsuz@sbcglobal.net
Sent: Saturday, April 05, 2008 12:29 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|9B
2|3A How many nuclear bombs does any one country need? Surely the U.S. has enough stockpiled already. Please concentrate on making the ones we have safe and developing safe ways for disposal of nuclear waste.

I ask that you include my comment as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project. Thank you.

Sincerely,
Suzanne Goodwin
5086 Gaynor Ave
Encino, CA 91436

cc:
Senator Dianne Feinstein
Senator Barbara Boxer
Representative Howard Berman

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Gordon, Judy
Page 1 of 1

#9 on S.R. Q&A room PC_126

Statement of Judy Gordon, PhD, Co-Chair, Savannah River Group, Sierra Club
February 21, 2008, Community Center North Augusta, SC

Draft Complex Transformation SPEIS
Public Hearings

I have participated and submitted comments in hearings such as this one, dealing with nuclear issues, over more years than I care to tally. One of the most egregious aspects of these public hearings is having to listen to local politicians rave about the wonderful economic benefits of whatever the nuclear complex is promoting.

1|2A These hearings are supposedly designed to gather information about the proposed actions- in this case the questions of why and how we deal with nuclear weapons. These are questions of NATIONAL CONCERN. Whether or not the local economy will benefit from whatever decisions are made should not be part of this process.

Rather, our attention and comments should address the following questions. Even though the word "environment" is not mentioned in each question, I would point out the words of the founder of the Sierra Club, John Muir: When we try to pick out something by itself, we find it connected to everything else in the universe.

2|13A 1. Will spending more money on revitalizing the nuclear weapons industry give us greater security?

3|1F; 4|1J 2. How will this affect nuclear proliferation and international treaties?

5|9F 3. How many weapons and how much money equal sufficient security?

6|1L 4. Are there alternatives for securing a safer world, alternatives that don't involve continuing the nuclear arms race?

5|9B 5. What government programs will be cut, or perhaps never funded, because we are transferring those monies into programs dealing with maintaining nuclear weapons?

6|14O; 7|7J 6. How will state and federal programs deal with all the more specific environmental issues- e.g. contamination that hasn't been cleaned up, the potential for more contamination, degradation of aquifers, increased contamination of and water losses from the Savannah River, and so on.

8|14L; 9|14M 7. Finally, how will we deal with social issues such as the possibility of shipping accidents, terrorist attacks, and the ever growing amounts of nuclear waste and where it will be confined?

I don't pretend to have the expertise to discuss the pros and cons of any of these points, but there are people here who can- for example, representatives of the Union of Concerned Scientists and the Natural Resources Defense Council.

10|14I; 1|2A (cont.) What they have to offer should certainly be more relevant than the remarks of people whose only concern is how many new jobs might be generated. And perhaps what disturbs me most, based on past experience, is that the local press will generally focus on the employment aspects and not the really serious issues that we should be addressing here.

Gorenflo, Louise
Page 1 of 2

PC_611

Levens, Matthew

From: Louise Gorenflo [lgorenflo@gmail.com]
Sent: Saturday, March 22, 2008 10:48 AM
To: Complex2030
Subject: Comments: DOCID:fr11ja08-38

RE: Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement
DOCID: fr11ja08-38
From: Louise Gorenflo

Date: March 22, 2008

1|13A The proposed project reflects the image of greed, violence, and, and sense of entitlement that our nation presents to the world. Through this project, we will experience more insecurity and isolation than we have now.

2|1L Building the peace takes much more intelligence and effort than building weapons of mass destruction with the threat to use them.

I attach some rules for human to live by.

3|16A I urge you not to go forward with this misbegotten project.

Louise Gorenflo
185 Hood Drive
Crossville TN 38555
931/484-2633

Rules for Being Human
You will receive a body. You may like it or hate it, but it will be yours for the entire period this time round.

You will learn lessons. You are enrolled in a full time informal school called life. Each day in this school you will have the opportunity to learn lessons. You may like the lessons or think them irrelevant and stupid. 4|20.0

There are no mistakes, only lessons.

Growth is a process of trial and error: experimentation. The failed experiments are as much a part of the process as the experiments that ultimately work.

A lesson is repeated until learned. A lesson will be presented to you in various forms until you have learned it. When you have learned it, you can then go on to the next lesson.

Learning lessons does not end. There is no part of life that does not contain its lessons. If you are alive, there are lessons to be learned.

There is no better than here. When your there has become a here, you will simply obtain another there

Gorenflo, Louise
Page 2 of 2

PC_611

that will again look better than here.

4|20.0 Others are simply mirrors of you. You cannot love or hate something about another person unless it reflects to you something you love or hate about yourself.

What you make of your life is up to you. You have all the tools and resources you need. What you do with them is up to you. The choice is yours.

Your answers lie inside you. The answers to life's questions lie inside you. All you need to do is to look, listen, and trust.

You will forget this.

Gorges, Janet
Page 1 of 1

PC_264

Janet Anne Gorges
Santa Fe, New Mexico
April 1, 2008

Attention National Nuclear Safety Administration:

1|7O We do not need any more plutonium pits at the Los Alamos National Labratories. We do not need in this country, any more nuclear weapons. Los Alamos has large safety issues already with employees as well as hazardous waste products. We need to honor the Nonproliferation Treaty that the U.S. ratified. We have already lost our stature in the world, let not make it worse.

Sincerely,
Janet A. Gorges

Gorrell, Emmie

Page 1 of 1

PC_463

Buenaflor, Justin

From: Emmie [emg4peace@windstream.net]
Sent: Saturday, February 16, 2008 7:41 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

1|16A I feel very strongly that the United States should not return to the business of making new nuclear weapons. Instead, consideration of major upgrades to the nuclear weapons complex must be preceded by a comprehensive re-evaluation of the role and future of nuclear weapons in U.S. security policy.
A thorough re-evaluation would conclude that it is in the interest of the United States to pursue a world free of nuclear weapons. The DOE should focus on maintaining a safe, secure, and credible nuclear deterrent while supporting efforts to eliminate these weapons globally, and on dismantling warheads and safely securing weapons-grade materials. The United States should NOT pursue new nuclear weapons.

Sincerely,

Emmie Gorrell

156 Darian Drive

Lexington, SC 29073

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Gosch, Michael

Page 1 of 1

PC_1159

Levens, Matthew

From: Michael Gosch, CSV [mgosh@viatorians.com]
Sent: Thursday, March 27, 2008 5:13 PM
To: Complex2030
Subject: Complex Transformation

Michael Gosch, CSV
1212 E. Euclid
Arlington Heights, IL 60004-5747

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

Isn't it amazing that President Bush's administration goes into panic mode when it hears of countries developing, thinking about developing, talking about developing nuclear weapons while at the same time it wants to build a plant to produce plutonium pits for nuclear weapons.

I suppose today's administration doesn't see the irony.

How sad.

1|16A Seriously, what will Complex Transformation achieve in the long run?
Please oppose it.

Sincerely,

Michael Gosch, CSV

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Gosselin, Claire

Page 1 of 1

PC_840

Levens, Matthew

From: Claire Gosselin [clagos@verizon.net]
Sent: Monday, April 07, 2008 10:38 PM
To: Complex2030
Subject: Draft Complex Transformation SPEIS Comments

to: Mr. Theodore A. Wyka, Complex Transformation SPEIS Document Manager

1|16A I want to add my voice to others who object to any further production of nuclear weapons -- streamlined, flexible or not.

2|5I 3|5J 4|20 Working with the toxic materials, mining more uranium or working with and transporting plutonium -- these are environmental hazards to all of us. I also object to resuming or expanding uranium mining in Native American lands where much of this material is located.

5|7J 6|14M We have yet to address the great quantity of nuclear waste that has been generated over the past 60+ years; not one more teaspoon should be generated!

7|1F The name "National Nuclear Security Administration" is a misnomer. If you were acting to address nuclear security, you would be implementing the promises made at the 2000 Nuclear NonProliferation Treaty Conference,
including:
- the promise to work for a verifiable treaty prohibiting production of fissile material for nuclear weapons -- in light of this, the GNEP program should be scratched;
- the promise to support the principle of irreversibility to apply to nuclear disarmament and related arms control measures -- we should support this, adopt verification, as should other nuclear weapons states.
- the promise to an unequivocal undertaking along with other nuclear weapons states to accomplish the total elimination of all nuclear arsenals in order to acheive the nuclear disarmament to which all States parties are already committed under Article VI of the NPT

8|1J -- that means no new nukes, no old nukes -- our country needs to practice what we preach.

1|16A (cont) 9|9H Environmental safety and genuine human security will begin to be possible when we live up to these and other promises to eliminate nuclear weapons and end testing. I'm really sick of supporting the nuclear war making industries with my family's tax dollars.

Invest in nuclear war-making no more.

Claire Gosselin
25 Cotton Street
Roslindale, MA 02131
clagos@verizon.net

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Gracey, Sue

Page 1 of 1

PC_1546

Levens, Matthew

From: Susan Gracey [sggracey@gmail.com]
Sent: Tuesday, April 08, 2008 1:20 PM
To: Complex2030
Subject: "Complex Transformation"

Dear Mr. Wyka,

1|16A As a member of the Disarm team of the Women's International League for Peace and Freedom, I strongly oppose the above-named endeavor. Pouring more funds into such endeavors is nothing short of immoral -- plus stupid. We all really have a pretty good idea of the needs of this planet and its inhabitants; these do not include more weapons, particularly of the nuclear variety. Einstein's comment -- "You cannot prepare for war and peace at the same time" -- comes to mind. The man had a pretty good mind, wouldn't you agree?

Sue Gracey
18 Monmouth Court
Brookline, MA 02446

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Graham, Charlotte

Page 1 of 1

PC_1590

Levens, Matthew

From: cjhgraham@yahoo.com
Sent: Saturday, April 05, 2008 9:47 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|16A 2|11A 3|1J I am very much opposed to the proposals in the Complex Transformation idea that would in effect reverse our many years of opposition to global nuclear proliferation. The proposed incrase and upgrade of our nuclear weapons capability needs careful study. On the face of it, such action would return the United States to a new Cold War at a time when Russia's admiistration has assumed a new hard line toward the United States.

4|1C Congress has mandated that the Department of Defense and the next president conduct a thorough review of our nuclear policy and strategy. I believe it is politically and morally wrong for the DOE to propose action now that could pre-empt or weaken such a future study.

1|16A (cont.) This is an issue that is so vital to our national future that it should be undertaken with the greatest caution and with input from the wisest individuals and policy makers in our nation. It certainly should not be done now, when a new president and a new administration are just months away.

I ask that you include my comments as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project.
Thank you.

Sincerely,
Charlotte Graham
12276 Glen Haven St
Spring Hill, FL 34609

cc:
Representative Ginny Brown-Waite
Senator Bill Nelson
Senator Mel Martinez

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Graham, H.G.

Page 1 of 1

PC_1616

Levens, Matthew

From: hollypatrice@comcast.net
Sent: Saturday, April 05, 2008 11:25 PM
To: Complex2030
Subject: No new bomb complex!

Mr Theodore Wyka
US DOE
Washington, DC

Sir,

1|16A No a million times to your plans to build new bomb plants, thus continuing the life extension program of the US nuclear stockpile.

1|16A (cont) No production alternatives, either! All weapons production must cease. All resources must be devoted to dismantlement and safe disposal of nuclear weapons materials and parts. No new weapons activities must ensue and certainly a new nuclear posture review is called for.

We do not want your agency to maintain an enduring nuclear stockpile. You are not representing the will of the people in this if you proceed.

2|1J We the people want nuclear disarmament and we want conversion to peaceful production of needed goods (windmills? solar energy packs?) without the proliferation of weapons of terror.

3|2O It is time for you to change your thinking. War is not the answer, and the continuing paradigm of terrorism through first strike attacks and nuclear menaces (by the US) is officially passe. Enough!

End the terror of nuclear weapons on the face of the earth! Disarmament starts at home. No weapons complexes and no stockpile life extension program!

For the sake of the children to come, hear the words of peace, and start now to make it real.

Sincerely,

H G Graham
Washington State

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Grande, Rosary

Page 1 of 1

PC_1512

Levens, Matthew

From: rgrande@rochester.rr.com
Sent: Tuesday, April 08, 2008 10:23 AM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

I applaud the Department of Energy for moving forward with plans to consolidate and
1|9B reduce.

This is an indefensible waste of money, screwing both the troops and the country.

If only the old and wiser IKE were here and still in power.....

I ask that you include my comment as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project.
Thank you.

Sincerely,
Rosary Grande
102 Maplehurst Rd.
Rochester,, NY 14617

cc:
Senator Charles Schumer
Representative Louise Slaughter
Senator Hillary Clinton

1

Granoff, Jonathan

Page 1 of 22

PC_1898

Levens, Matthew

From: JGG786@aol.com
Sent: Thursday, April 10, 2008 8:48 PM
To: Complex2030
Subject: Submission to DOE on Complex Transformation

Presentation regarding Complex Transformation and why a thorough review of US policy is needed to ensure fulfillment of existing legal obligations and efforts to make the US a safer more secure country.
Experts such as Henry Kissinger, George Schultz, Sam Nunn and William Perry have twice called for the abolition of nuclear weapons in Wall Street Journal
1|16A; Opeds in the past 14 months. In 1996, the International Court of Justice
2|1F; unanimously ruled in an advisory opinion that there is a duty to negotiate the
3|13A.1 elimination of nuclear weapons. The nuclear Nonproliferation Treaty (NPT) was extended in 1995 based on the agreement to make progress on Article VI of the Treaty calling for good faith progress on nuclear disarmament. Thus, a strong basis exists to advance the world to greater security by taking practical steps to lower the reliance on nuclear weapons and work to achieve their universal legally verifiable elimination. To do this it is necessary to take 13 practical steps, agreed by all parties to the NPT at its review conference of the NPT in 2000, which must not be ignored, since doing so will corrode the NPT and stimulate nuclear weapons proliferation. Nuclear weapons proliferation is against US interests.
Complex Transformation is an insult to the many members of the NPT which have restrained themselves from developing nuclear weapons. It implicitly asserts that the US is not serious about fulfilling its disarmament obligations. These are not unilateral obligations, but exist as duties pressing also upon all nuclear weapons states.
Yes, a review needs must be done but it should be done by the new administration and not the one sitting now.
I have included below extensive testimony relevant to these decisions which
4|1J I have given in the US Congress. I believe Complex Transformation, a form of vertical proliferation, will stimulate horizontal proliferation and undermine US credibility as a leader in fulfilling Article VI obligations under the NPT.
Respectfully,
Jonathan Granoff
President Global Security Institute
Suite 400
One Belmont Ave.
Bala Cynwyd, Pa.
19004

Weapons of Mass Destruction:
Current Nuclear Proliferation Challenges

Testimony by
Jonathan Granoff, Esq.
President
Global Security Institute
GSB Building, Suite 400
One Belmont Avenue
Bala Cynwyd, PA 19004
Tel: 610-668-5488

1

Granoff, Jonathan

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Fax: 610-668-5489
www.gsinstitute.org (http://www.gsinstitute.org/)

PC_1898

Presented before a hearing of the
House Committee on Government Reform
Subcommittee on National Security, Emerging Threats and International Relations
United States House of Representatives
Washington, D.C.
September 26, 2006

In 1965, I met Robert Kennedy while working in Washington. A small group of interns listened in rapt attention as he explained how close we were to the end of civilization during the Cuban Missile Crisis. I will never forget how he emphasized that the challenge of eliminating nuclear weapons before they eliminate us is the litmus test for humanity. Success or failure will determine our moral standard and our capacity to be led by reason and law to security, or to oblivion through fear, the quest for power, and apathy.
Nearly every country in the world has accepted the Nuclear Nonproliferation Treaty (NPT) as a necessary legal instrument to address this threat. While simultaneously condemning the spread of nuclear weapons, this treaty sets forth a related obligation to obtain their universal elimination. In 1995, in order to obtain the indefinite extension of the NPT, now with 188 states parties, commitments to nuclear elimination were confirmed and strengthened by the five declared nuclear weapon states – China, United States, France, Russia, and Britain. However, the nuclear weapon states with over 96% of the weapons, the United States and Russia, have not fully addressed their fundamental dilemma: they want to keep their nuclear weapons indefinitely and at the same time condemn others who would attempt to acquire them. It is as if parents were telling their children not to smoke while puffing on cigars themselves. It is simply not effective.
This incoherence in policies leads to instability in cooperation. Nothing could be more hazardous in today's world. In order to ensure that nuclear weapons do not proliferate to more states and to dangerous sub-state actors, confidence in the restraint of the exercise of power by the most powerful is needed. The trust and cooperation needed for a global assault against such threats will not be effective if some states flaunt their disarmament obligations yet display a passion for nonproliferation.
I will highlight some of the incoherences that are creating instability in the nonproliferation regime, and a path to coherence that simultaneously reduces threat and strengthens nonproliferation efforts. These steps will also reveal as irrational the baiting of the US in international forums by countries hostile to US interests. The path to stability and security is a return to promoting the pursuit of collective security through the rule of law. In the field of nuclear weapons, this translates – among other things - into fulfilling the existing legally mandated disarmament responsibilities that remain unaddressed by the nuclear weapon states. It is simply impractical and hypocritical for some to say that nuclear weapons are morally acceptable for them to possess and even threaten to use, and evil for others to attempt to acquire.
With this in mind, allow me to address the perception, common in Washington and reflected in the Subcommittee's questions, that the NPT is failing.
Looking at the NPT's good record over the past three and one-half decades, it is hard to understand the basis for the perception. It is true that three states that stayed outside the treaty from its inception in 1970 have acquired arsenals, Israel, India, and Pakistan. This is unfortunate, but it is also a problem that predated the NPT._[1]_ (aoldb://mail/write/template.htm#_ftn1)
In contrast to these three, other states have changed their policies over time, renounced nuclear weapons and joined the treaty. For example, South Africa relinquished its small arsenal and Brazil and Argentina gave up weapons-relevant programs. China and France accepted the NPT disarmament obligation in joining the treaty as declared nuclear weapon states in 1992. The vast majority of states have complied with the obligation of non-acquisition. Serious

2

Granoff, Jonathan

Page 3 of 22

PC_1898

efforts to acquire nuclear weapons in violation of the treaty are known to have occurred only in a handful of cases, Iraq and Libya, where programs have been reversed, and North Korea.
Thus the immediate concern over the spread of nuclear weapons comes down to two countries, admittedly problematic cases, North Korea and Iran. The North Korean problem in a way is a Cold War legacy. North Korea, as well as Iran, has also recently been the target of a U.S. policy of regime change, a policy at odds with the overriding objective of preventing nuclear weapon acquisition. It should be a matter of the highest priority to bring this chapter of history to a close and to achieve a denuclearized Korean peninsula. Whether a country is rational or irrational, direct threats to its security ensure failure in disarmament negotiations. (Please note the Gwangju Declaration issued under the leadership of former South Korean President Kim Dae-jung at a recent Nobel Peace Laureates summit, included in Appendix B.)
It is also urgent to reach a negotiated end to the ongoing confrontation with Iran over its uranium enrichment program. Should Iran achieve a weapons capability over the next five to ten years, or go further and acquire weapons at some point in the future, other states in the region will face enormous pressure to follow suit. The Weapons of Mass Destruction Commission has identified elements of a solution including a freeze on enrichment and reprocessing in the region as a step towards a WMD-free zone._[2]_ (aoldb://mail/write/template.htm#_ftn2) Other negotiated measures should be examined. Given Iran's attachment to its enrichment program for reasons for national pride if no other, a deal may regrettably need to include tightly supervised research activities located in that country. Appendix A identifies regime management reforms whose need is demonstrated by the experience with Iran.
The NPT Bargain: Recent Developments
To summarize: the NPT has a remarkable record of preventing the spread of nuclear weapons, but is now facing multiple challenges: regional crises in the Middle East and Northeast Asia; the spread of nuclear fuel cycle technology; and the imperative of progress on fulfilling disarmament commitments to create the reciprocity that will make the entire regime viable. In the remainder of my testimony, I want to concentrate on the last point. A good understanding requires a brief review of the history of the NPT.
The basic bargain underlying the text completed in 1968 was this: In exchange for a commitment from the non-nuclear weapons states not to acquire nuclear weapons and to submit their peaceful nuclear activities to monitoring to verify compliance with the non-acquisition commitment (Article II), the NPT nuclear weapon states pledged to engage in disarmament negotiations aimed at the elimination of their nuclear arsenals (Article VI) and promised the non-nuclear-weapon parties unfettered access to peaceful nuclear technologies (e.g. nuclear power reactors and nuclear medicine; Article IV)._[3]_ (aoldb://mail/write/template.htm#_ftn3) During the negotiations at its creation, several prominent non-nuclear weapons states – Germany, Italy and Sweden, for example – would not permit the treaty to be permanent and ensured that it would be reviewed after 25 years and either be extended for a fixed period, be indefinitely extended (Article X), or lapse. At the 1995 Review and Extension Conference, many states were extremely dissatisfied with the progress on disarmament of the nuclear weapons states – U.S., Russia, U.K., France, and China – and argued that they would not accept the inequity of a dual global system of nuclear haves and have-nots. They demanded and obtained a bargain. It contained a Statement of Principles and Objectives for Nuclear Nonproliferation and Disarmament,_[4]_ (aoldb://mail/write/template.htm#_ftn4) which politically, if not legally, conditioned the indefinite extension of the treaty, pledging to:

* complete a Comprehensive Nuclear-Test Ban Treaty by the end of 1996
* reaffirm the commitment to pursue nuclear disarmament
* commence negotiations on a treaty to stop production of nuclear bomb materials
* encourage the creation of nuclear weapons free zones
* vigorously work to make the treaty universal by bringing in Israel, Pakistan and India
* enhance IAEA safeguards and verification capacity
* reinforce negative security assurances already given to non-weapons

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Granoff, Jonathan

Page 4 of 22

states against the use or threat of use of nuclear weapons against them PC_1898
The bargain to extend the treaty centered on a strengthened review process with near yearly preparatory conferences and a rigorous review every five years to ensure the promise as set forth in the Principle and Objectives: "The determined pursuit by the nuclear-weapon states of systematic and progressive efforts to reduce nuclear weapons globally, with the ultimate goal of eliminating those weapons."
The 1995 re-commitment to and elaboration of the NPT nuclear disarmament obligation was reinforced by the 1996 advisory opinion of the International Court of Justice. Interpreting Article VI of the NPT and other international law, the Court unanimously held: "There exists an obligation to pursue in good faith and bring to a conclusion negotiations on nuclear disarmament in all its aspects under strict and effective international control."_[5]_ (aoldb://mail/write/template.htm#_ftn5)
The 2000 Review Conference successfully reached a consensus on 13 Practical Steps to advance the commitments to lower the salience of nuclear weapons in policies, reinforce nonproliferation measures, and move toward the elimination of nuclear weapons. All 187 States Parties agreed on the following measures:_[6]_ (aoldb://mail/write/template.htm#_ftn6)
1. Entry into Force of the Comprehensive Nuclear-Test-Ban Treaty (CTBT): The importance and urgency of signatures and ratifications, without delay and without conditions and in accordance with constitutional processes, to achieve the early entry into force of the CTBT.
2. Holding the Line Against Testing: A moratorium on nuclear-weapon-test explosions or any other nuclear explosions pending entry into force of the CTBT.
3. Fissile Material Cut-off Treaty (FMCT): The necessity of negotiations in the Conference on Disarmament on a non-discriminatory, multilateral and internationally and effectively verifiable treaty banning the production of fissile material for nuclear weapons or other nuclear explosive devices. The Conference on Disarmament is urged to agree on a program of work which includes the immediate commencement of negotiations on such a treaty with a view to their conclusion
within five years.
4. Negotiations on Nuclear Disarmament: The necessity of establishing in the Conference on Disarmament an appropriate subsidiary body with a mandate to deal with nuclear disarmament. The Conference on Disarmament is urged to agree on a program of work which includes the immediate establishment of such a body.
5. Irreversibility: The principle of irreversibility to apply to nuclear disarmament, nuclear and other related arms control and reduction measures.
6. Commitment to Elimination: An unequivocal undertaking by the nuclear-weapon States to accomplish the total elimination of their nuclear arsenals leading to nuclear disarmament to which all States parties are committed under Article VI.
7. Verified Reductions: The early entry into force and full implementation of Strategic Arms Reduction Treaty (START) II and the conclusion of START III as soon as possible while preserving and strengthening the Anti-Ballistic Missile (ABM) Treaty as a cornerstone of strategic stability and as a basis for further reductions of strategic offensive weapons, in accordance with its provisions.
8. Control of U.S./Russian Excess Fissile Materials: The completion and implementation of the Trilateral Initiative between the United States of America, the Russian Federation and the International Atomic Energy Agency.
9. Progress by Nuclear Weapons States: Steps by all the nuclear-weapon States leading to nuclear disarmament in a way that promotes international stability, and based on the principle of undiminished security for all:
• Further efforts by the nuclear-weapon States to reduce their nuclear arsenals unilaterally.
• Increased transparency by the nuclear-weapon States with regard to the nuclear weapons capabilities and the implementation of agreements pursuant to Article VI and as a voluntary confidence-building measure to support further progress on nuclear disarmament.
• The further reduction of non-strategic nuclear weapons, based on unilateral initiatives and as an integral part of the nuclear arms reduction and disarmament process.

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• Concrete agreed measures to further reduce the operational status of PC_1898
nuclear weapon systems. The
• A diminishing role for nuclear weapons in security policies to minimize the risk that these weapons ever be used and to facilitate the process of their total elimination.
• The engagement as soon as appropriate of all the nuclear-weapon States in the process leading to the total elimination of their nuclear weapons.
10. Excess fissile materials under IAEA control: Arrangements by all nuclear weapon
States to place, as soon as practicable, fissile material designated by each of them as no longer required for military purposes under International Atomic Energy Agency (IAEA) or other relevant international verification and arrangements for the disposition of such material for peaceful purposes, to ensure that such material remains permanently outside of military programs.
11. General and Complete Disarmament: Reaffirmation that the ultimate objective of the efforts of States in the disarmament process is general and complete disarmament under effective international control.
12. Reporting: Regular reports, within the framework of the NPT strengthened review process, by all States parties on the implementation of Article VI and paragraph 4 (c) of the 1995 Decision on "Principles and Objectives for Nuclear Non-Proliferation and Disarmament", and recalling the Advisory Opinion of the International Court of Justice of 8 July 1996.
13. Verifying: The further development of the verification capabilities that will be required to provide assurance of compliance with nuclear disarmament agreements for the achievement and maintenance of a nuclear-weapon-free world.
This is a comprehensive and sophisticated agenda that provides guidelines for implementation in good faith of the Article VI disarmament obligation. Not every measure is specifically required for good-faith fulfillment of Article VI, but some elements are essential. Most of the world's governments – including U.S. allies – agree that the key commitments include application of the principles of transparency, irreversibility, and verification of reduction and elimination of nuclear weapons; the necessity of a diminishing role for nuclear weapons in security policies; the reduction of the operational status of nuclear weapons systems; the entry into force of the CTBT; and negotiations on a Fissile Materials Cut-off Treaty._[7]_ (aoldb://mail/write/template.htm#_ftn7)
However, since 2000, the United States has backtracked on key commitments made in the Practical Steps, notably the CTBT; negotiation of a verified FMCT; the START process and the ABM Treaty. The 2002 bilateral Strategic Offensive Reductions Treaty (SORT) with Russia fails to apply the principles of transparency, verification, and irreversibility. Furthermore, it could be argued that SORT fails to diminish the role of nuclear weapons in security policies, a duty consistent with NPT pledges. The Administration's position is that the 2000 commitments are only "political," that circumstances have changed, and that compliance with Article VI is demonstrated by a four-fold reduction in the size of its arsenal since the Cold War. What is at stake here is not just a U.S.-Russian issue. The Practical Steps, adopted at the 2000 NPT Review Conference, represent an international consensus on the means for compliance with Article VI. Good faith requires at a minimum that the United States put forward alternative means for compliance. This the United States has not done. It is simply not enough to say that the U.S. and Russian arsenals have been reduced when their potential to destroy the world remains the same.
Without active U.S. leadership, hopes for progress on nuclear nonproliferation and disarmament were dashed from the outset of the 2005 Review Conference,
held at the UN in May 2005. The states parties were unable to even generate a timely working agenda and 15 out of 20 days were squandered on procedural battles. The procedural squabbles masked real debate on substantive political differences. The capacity to make substantive progress on disarmament or nonproliferation was thwarted despite efforts of the world's best diplomats. The 2005 agenda was stalled along several fault lines. The United States would not permit the commitments already made under the treaty review process to be the basis for a working agenda and focused on the proliferation threats posed by Iran and North Korea; Egypt demanded recognition of previous commitments,

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in particular regarding making the treaty universal; Iran baited the nuclear weapon states on their failure to make progress on disarmament, specifically the United States for its research on modified or new-design warheads with new military capabilities. In the end, no consensus document was generated.
The U.S. unwillingness to specifically respond to demands to have its previous commitments reviewed placed the very integrity of the institution of the NPT at risk. For if commitments made yesterday need not be held to account today, why should any commitments made to the body of the NPT ever be taken seriously? Grave harm was done to international law at the 2005 Review Conference. Universally respected nonproliferation goals were not seriously negotiated, not because of a poverty of valid proposals, but because of a failure of political will. Effective means of addressing threats posed by States leaving the treaty, or, like Iran, using the treaty to develop nuclear energy with the potential for using technical advances and fissile materials to develop weapons, as well as the failure of NWS to fulfill their pledges to take practical steps toward elimination were not achieved.
All too many diplomats expressed concern that the U.S. was not taking international cooperative security under the rule of law seriously enough. In that regard one cannot overlook a statement made in the National Defense Strategy of the United States released in March 2005 by the Defense Department. In the section addressing the Changing Security Environment, there is a new definition of vulnerability, very much at odds with U.S. traditional advocacy of promoting law and diplomacy as a means of achieving security:
"Our strength as a nation state will continue to be challenged by those who employ a strategy of the weak using international fora, judicial processes, and terrorism."
Without U.S. leadership toward international fora and judicial process embodied in arms control agreements and other instruments of cooperative security, even the Heads of State of the world will remain stymied to such an extent that they will simply be unable to address proliferation issues through diplomacy. On September 13, 2005, in addressing the press regarding the September 2005 Summit at the UN of Heads of State in reference to their Final Statement, Secretary-General Kofi Annan said:
"The big item missing is non-proliferation and disarmament. This is a real disgrace. We have failed twice this year: we failed at the NPT [Review Conference], and we failed now."
This institutional deadlock has arisen from a profound failure of political will to work cooperatively. This diminution of utilization of diplomacy and law renders the reliance on force and war more likely. Proliferation is unacceptable, indeed. But is counter-proliferation, such as the war in Iraq, the first counter-proliferation war, so effective?
Looking Forward
Our task now is to look forward; while we need to understand how we got to the present juncture, the issues are simply too serious to spend too much time regretting missed opportunities. Let me now, drawing on the rich history of agenda-setting in the NPT context, identify key steps that reinforce non-proliferation and disarmament._[8]_ (aoldb://mail/write/template.htm#_ftn8)
Fissile Materials Cut-off Treaty
An FMCT would permanently end production of fissile materials, primarily separated plutonium and highly enriched uranium (HEU), for use in weapons. It would affect most directly the countries possessing nuclear weapons; NPT non-weapon states already are subject to a verified ban on diverting materials to weapons. Achievement of an FMCT would restrain arms racing involving India, China, and Pakistan, cap Israel's arsenal, and establish ceilings on other arsenals as well. A verified FMCT also would help build a stable framework for reduction and elimination of warheads and fissile material stocks; help prevent acquisition of fissile materials by terrorists; meet a key NPT commitment; and institutionalize one of the basic pillars of a nuclear weapons-free world. When negotiations on the FMCT begin, the United States should return to its long-established position that verification is imperative and feasible._[9]_ (aoldb://mail/write/template.htm#_ftn9)
Verification of reduction and elimination of nuclear arsenals
President Reagan repeatedly invoked the Russian dictum, "trust but verify." It is essential to bring the principle of verification symbolized by that dictum back to center stage. The Strategic Offensive Reductions Treaty (SORT) requires Russia and the United States each to deploy no more than 2200

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strategic warheads by 2012, but includes no provisions for verification of reductions or dismantling of warheads or delivery systems, leaving each country free to retain thousands of warheads in addition to those deployed. The two countries declared that they would make use of monitoring mechanisms under START to track reductions. But START expires in 2009, and SORT does not provide any schedule for reductions prior to 2012. A high priority therefore is for the United States and Russia to agree on means to verify and make irreversible the reductions. The WMD Commission recommends negotiation of a new treaty that would further cut strategic forces and also provide for verified dismantlement of warheads withdrawn under SORT._[10]_ (aoldb://mail/write/template.htm#_ftn10) In negotiating SORT, the Bush administration rejected a detailed agreement spelling out transparency and verification measures on the grounds that Cold War-style arms control is no longer necessary and that the United States has no interest in determining together with Russia the size and composition of the two countries' arsenals. This approach overlooks that Cold War or no, the two countries need to regulate their nuclear relationship; "partnership" is not necessarily forever. Further, accounting for warheads and verifying reductions is essential to achieving marginalization and elimination of nuclear weapons globally.
Verification is necessary not only for U.S. security interests. Verification also follows from the truth that the United States cannot be secure in an insecure world. Verification is needed to bring greater security to the rest of the world because the rest of the world is properly concerned with the efficacy of the disarmament and arms reduction efforts of the United States and Russia.
In working towards a nuclear weapons-free world, many tools exist for effective verification and monitoring, especially with respect to declared facilities, warheads, and fissile materials, as shown by studies this decade undertaken by the United Kingdom_[11]_ (aoldb://mail/write/template.htm#_ftn11) and the U.S. National Academy of Sciences._[12]_ (aoldb://mail/write/template.htm#_ftn12) However, achieving confidence that reduction and elimination of arsenals has been implemented remains challenging, principally due to the possibility of hidden warheads, stocks of fissile materials, or capabilities. The National Academy of Sciences found that confidence would increase based on monitoring programs undertaken on a ongoing, long-term basis in an atmosphere of transparency and cooperation._[13]_ (aoldb://mail/write/template.htm#_ftn13)
An implication is that verification and transparency measures need to be implemented beginning now, above all regarding U.S.-Russian stocks and reductions. More broadly, all nuclear-armed states must initiate processes to apply the principles of verification, transparency, and irreversibility to reduction and elimination of their arsenals. Declarations of fissile materials contained in military stocks and warheads, as recommended by the International Panel on Fissile Materials, is one of the first steps that could be taken.
Countries with nuclear weapons owe the rest of the world greater proof of compliance with the disarmament obligation. To that end, verification processes should involve international monitoring.
Reduction of the operational status of nuclear forces
The United States is now estimated to have more than 1600 warheads ready for delivery within minutes of an order to do so, and Russia more than 1000 warheads similarly ready for launch._[14]_ (aoldb://mail/write/template.htm#_ftn14) It should be an absolute scandal that, every moment of every day, the two countries remain locked in a Cold War-style nuclear standoff.
Non-governmental experts have explained that the standoff can be defused through separation of warheads from delivery systems and other measures that lengthen the time required for a nuclear launch, from days to weeks to months._[15]_ (aoldb://mail/write/template.htm#_ftn15) An accompanying step is the elimination of the launch-on-warning option that requires nuclear forces to be on hair-trigger alert. The U.S. and Russia should follow the admonition of George W. Bush who said when he was a candidate for president in 2000: "The United States should remove as many weapons as possible from high-alert, hair-trigger status – another unnecessary vestige of the Cold War confrontation. Preparation for

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quick launch – within minutes after warning of an attack – was the rule during the era of superpower rivalry. But today, for two nations at peace, to keep so many weapons on high alert may create unacceptable risks of accidental or unauthorized launch."

While most urgent with respect to Russia and the United States, it is also vital that other weapon states, which to various degrees already maintain their forces in a de facto de-alerted condition, adopt and affirm de-alerting as an entrenched, declared policy and practice. De-alerting would help alleviate risks associated with mistakes, coups, attacks on nuclear weapons facilities, false warnings, unauthorized launches, hacking into command and control systems, and developments that cannot now be anticipated. Depending on the extent of its execution and verification, it would also lessen the moral corruption inherent in reliance on nuclear weapons for security and defense.

Comprehensive Nuclear-Test-Ban Treaty

After four decades of discussions and partial test ban agreements, negotiations on the CTBT were completed in 1996. Although 135 states have ratified the treaty, ten of the 44 states whose ratification is required for entry into force have yet to do so. Of the ten, three weapon-possessing states, the United States, China, and Israel, have signed but not ratified the treaty; two other weapon-possessing states, India and Pakistan, have not taken the first step of signing it; and North Korea, which may have weapons, has also not signed. The Preparatory Commission for the CTBT Organization has made great strides in developing the International Monitoring System, which will likely be completed in 2007. In a 2002 study, the U.S. National Academy of Sciences concluded that with a fully functioning monitoring system, clandestine nuclear explosions with a yield of more than one to two kilotons are detectable by technical means alone, and further found that any undetected low-yield explosions are not likely to significantly advance weapon development._[16]_ (aoldb://mail/write/template.htm#_ftn16) The CTBT would help to check the spread of nuclear arms and to constrain refinement of advanced arsenals; protect the environment; and have a substantial organizational and technical infrastructure. It would be an indispensable part of the architecture of a nuclear weapons-free world. Its entry into force must remain a high priority. Also crucial is maintenance of the moratorium on nuclear test explosions that has held since the 1998 tests by India and Pakistan and continued support for the Preparatory Commission.

The United States and other states possessing nuclear arsenals should also refrain from warhead research and development. It is contrary to a central purpose of the NPT and the commitment in the Practical Steps to a diminishing role for nuclear weapons in security policies, and could lead to a resumption of testing to gain confidence in the performance of new or modified warheads. The WMD Commission stated: "If research on nuclear weapons is continued, modifications should only be for purposes of safety and security – and demonstrably so."_[17]_ (aoldb://mail/write/template.htm#_ftn17) But research and development is taking place for purposes of replacing existing systems, increasing reliability over the long term, and enhancing military capabilities. France reportedly is planning the deployment of new warheads whose concept was tested in 1995-1996 on new versions of its cruise and submarine-launched missiles._[18]_ (aoldb://mail/write/template.htm#_ftn18) Russia is developing new warheads for its most recent silo-based and mobile missiles, including one involving a maneuverable reentry vehicle._[19]_ (aoldb://mail/write/template.htm#_ftn19) The U.S. "reliable replacement warhead" program aims to yield modified or new-design warheads;_[20]_ (aoldb://mail/write/template.htm#_ftn20) Britain reportedly has a similar program._[21]_ (aoldb://mail/write/template.htm#_ftn21)

Despite current Congressional intentions, the U.S. program will enable research on improvement of military capabilities. It has been described by a top official as incubating future "revitalized" scientists able to design, develop and produce a new-design warhead with "different or modified military capabilities" within three to four years of a decision to do so._[22]_ (aoldb://mail/write/template.htm#_ftn22) The Department of Defense projects that four to six replacement or refurbished warheads will be deployed in about two decades, and also envisions warhead development for next-generation delivery systems._[23]_ (aoldb://mail/write/template.htm#_ftn23) Exotic changes are not

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necessary to achieve significant advances in capability. Under the U.S. "lifetime extension program," the main warhead for submarine-launched missiles is being given a capacity to destroy "hard targets" with a "ground burst" by modifying a sub-system in its reentry vehicle._[24]_ (aoldb://mail/write/template.htm#_ftn24) To the extent that weapon states' modernization programs are intended to and will result only in perpetuating existing military capabilities, planning and preparing for maintenance of nuclear forces for decades to come is contrary to the obligation to work in good faith for their elimination.

A diminishing role of nuclear weapons in security policies and strengthened assurances of non-use of nuclear weapons against non-weapon states

The 2000 NPT Review Conference rightly and wisely recognized that reducing the role of nuclear weapons in security postures makes the world safer now and facilitates progress in reduction and elimination of nuclear arsenals. With the exception of China, which has maintained its existing policy of no first use, none of the weapon states has complied with this commitment. France earlier this year signaled that nuclear weapons could be used against a state responsible for a large-scale terrorist attack on France._[25]_ (aoldb://mail/write/template.htm#_ftn25) The United States claims to be in compliance with the commitment due to development of non-nuclear means for striking enemy targets and defending against attacks (e.g., anti-missile systems). However, the increased emphasis in recent years on options for use of nuclear weapons in a widening range of circumstances makes nonsense of this claim.

The classified but leaked 2001 Department of Defense Nuclear Posture Review (NPR) states that nuclear weapons will be "integrated with new nonnuclear strategic capabilities" including advanced conventional precision-guided munitions,_[26]_ (aoldb://mail/write/template.htm#_ftn26) suggesting a view of nuclear weapons as "simply another weapon."_[27]_ (aoldb://mail/write/template.htm#_ftn27) It plans for an enlarged range of circumstances under which nuclear weapons could be used, notably against non-nuclear attacks or threats. It refers to contingency planning for use of nuclear weapons against Russia, China, North Korea, Iraq, Iran, Syria, and Libya, and identifies possible "immediate contingencies" requiring U.S. nuclear use including "a North Korean attack on South Korea, or a military confrontation over the status of Taiwan."

The NPR also states that nuclear weapons "could be employed against targets able to withstand nonnuclear attack, (for example, deep underground bunkers or bio-weapon facilities)," and contemplates their use in response to a biological or chemical attack._[28]_ (aoldb://mail/write/template.htm#_ftn28) Finally, the NPR refers to nuclear use in response to "surprising military developments" and "unexpected contingencies."_[29]_ (aoldb://mail/write/template.htm#_ftn29) Those new catch-all categories are virtually without limit.

The NPR was reinforced in December 2002 by a presidentially approved document, the National Strategy to Combat Weapons of Mass Destruction. It states that the United States "reserves the right to respond with overwhelming force - including through resort to all of our options - to the use of WMD [weapons of mass destruction] against the United States" and its "friends and allies."_[30]_ (aoldb://mail/write/template.htm#_ftn30) The reference to "all of our options" is an invocation of the nuclear option. The document also identifies preemptive military action as one means of responding to states' acquisition of NBC weapons or capabilities, and does not exclude U.S. use of nuclear weapons in a preemptive attack. Subsequent military planning documents repeat and elaborate the formulations found in the NPR, with allusions to the option of nuclear preemptive use, and state plainly, as the National Strategy had implicitly, that nuclear weapons may be used in response to a chemical or biological attack._[31]_ (aoldb://mail/write/template.htm#_ftn31)

Recent doctrinal statements are not unprecedented. In the 1990s, as the U.S. nuclear establishment sought to establish new missions in the aftermath of the Cold War, references to options for use of nuclear weapons in "counterproliferation" missions in response to biological, chemical, and nuclear weapons use and capabilities surfaced in a variety of governmental settings._[32]_ (aoldb://mail/write/template.htm#_ftn32) However, the recent statements are different in three important respects. First, the authoritativeness is heightened, by a presidential signature on a public document in the case of the

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National Strategy, and by a defense secretary's signature in the case of the Nuclear Posture Review. Second, ambiguity has been lessened and effectively removed about whether the United States maintains the option of a nuclear response to use of chemical and biological weapons as well as nuclear weapons, and the possibility of nuclear preemptive use has been given a higher profile. Third, the NPR's reference to "surprising military developments" significantly widened, at least theoretically, the circumstances for U.S. nuclear use. Thus far from diminishing the role of nuclear weapons in security policies, as called for by the NPT 13 steps, the United States is expanding options for nuclear use. This point was illustrated chillingly this year by credible media reports that, until the Joint Chiefs of Staff insisted on their removal, U.S. civilian officials at the highest level wanted to keep nuclear use options in plans for counter-proliferation strikes on Iran._[33]_ (aoldb://mail/write/template.htm#_ftn33) During the Cold War, nuclear weapons were rationalized by the policy of mutually assured destruction, a policy paradoxically designed to ensure non-use. Now, there is a new emphasis on their war-fighting role. It is morally comprehensible, though not morally acceptable, certainly as a long-term policy, that nuclear weapons would be retained to prevent their use by another country. It is not morally intelligible to project the use of nuclear weapons in a wide range of circumstances, not limited to possible response to another country's nuclear use. Nor is it wise, because it may one day lead to the actual use of nuclear weapons, and because it enhances their political value, and therefore encourages their spread.

The United States should therefore reaffirm the assurances of non-use of nuclear weapons previously given to NPT states parties which have renounced the possession of nuclear arms, and support rather than oppose codification of the assurances in a treaty. The logic is unassailable; countries that have foresworn nuclear weapons are entitled to guarantees of non-use of the weapons against them. Furthermore, the United States should adopt a declared policy of no first use of nuclear weapons.

Conclusion: Disarmament as the compass point

Implementation of the above-outlined priority measures and the regime-management reforms outlined in the Appendix I should take place in the context of a

visible intent to achieve a nuclear weapons-free world. The priority measures are valuable in and of themselves. They decrease risks of use, diminish the access of terrorists to catastrophic weapons and materials to build them, raise barriers to acquisition by additional states, and generate support for strengthening the nonproliferation side of the regime and resolving regional crises. Moreover, the measures pass key tests: they enhance security generally; they do not diminish the security of any state; they reinforce the NPT and enhance the rule of law; they make the world safer now; they move the world towards elimination of nuclear weapons.

To conclude: Building an effective nonproliferation/disarmament regime is complex and challenging. The underlying principle, however, is simple, and serves as a guide to the work. Nuclear weapons are morally, legally, and practically unacceptable. As my mentor, the late Senator Alan Cranston, used to say, "Nuclear weapons are unworthy of civilization." Perpetual nuclear apartheid – some countries have the weapons, others are forbidden to have them – is unsustainable. Both practical and moral coherence requires application of a universal standard, a golden rule: no country may possess weapons capable of inflicting catastrophic, city-destroying or even civilization-ending, damage. If we meet the challenge of implementing this rule, we will pass down to our children and grandchildren and all succeeding generations a world preserving the advances made by hundreds of previous generations, including our own.

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Appendix A: Needed Nonproliferation Reforms

Experience since the Cold War with preventing proliferation, in particular with regard to North Korea and Iran, teaches three lessons about strengthening the regime for the future.

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First, material and ongoing violations of safeguards reporting requirements should result in forfeiture of the right to acquire nuclear fuel production technology under Article IV of the NPT. The United States made this point in NPT meetings with respect to Iran, but it has never been squarely addressed by the IAEA Board of Governors, NPT states parties, or the Security Council.

Second, institutional reform is needed to create effective compliance assessment mechanisms. There is no body empowered to assess whether a state is breaching its NPT obligation by seeking to acquire nuclear weapons nor by failing to comply with the commitment to good faith negotiations on disarmament. Under its Statute, the IAEA has the important but limited task of ascertaining whether nuclear materials have been diverted to a weapons program, which it has not found to be the case in Iran. But there are other aspects to a weapons program, for example warhead design and missile development. What is needed is an NPT governing body which together with the IAEA, perhaps also drawing on UNMOVIC-type resources, has this responsibility, as well as the responsibility of monitoring reduction and elimination of existing arsenals. There have been multiple proposals to strengthen NPT institutional capability, by adding a secretariat, a governing council, and/or empowered annual meetings of states parties. The proposals have come from responsible states like Ireland and Canada and from the Weapons of Mass Destruction Commission,_[34]_ (aoldb://mail/write/template.htm#_ftn34) and have been advanced as well by Jayantha Dhanapala, chair of the 1995 Review and Extension Conference and former UN Under Secretary-General for Disarmament Affairs._[35]_ (aoldb://mail/write/template.htm#_ftn35) So far the United States has shown no interest.

Third, policy tools work best when integrated into the global system.

Effective nonproliferation and disarmament requires a robust multilateralism based upon global norms. This is not to say that policy tools involving international cooperation short of a global regime have no place. The tools include export control arrangements; the network of states (the Proliferation Security Initiative) prepared to interdict illicit shipments of nuclear, biological and chemical (NBC) weapon-related equipment, materials, and delivery systems; and the G-8 program building on the Cooperative Threat Reduction program aimed at securing NBC weapons and materials in Russia and other countries. But their effectiveness can be optimized by finding ways to link them to the global regime. An example of movement towards such integration is Security Council resolution 1540, which requires all states to take steps to prevent acquisition of and trafficking in NBC weapon-related items by states, terrorists and other non-state actors. Among other things, the resolution requires all states to appropriately regulate exports. It is a step toward universalizing nuclear weapons control by means of law established by the Security Council. The Bush administration is to be commended for its leadership in the solidification of global law through resolution 1540. But I must register two cautions. The first is that, as with other nonproliferation measures, the extent of compliance will depend crucially on how well the states possessing nuclear arsenals do in fulfilling their side of the bargain. The second is that given the limited membership of the Security Council and its control by the United States and other permanent members, all possessing nuclear weapons, legitimacy and in-depth commitment will best be achieved by subsequent codification of 1540 and similar requirements in multilateral treaties.

Appendix B: Underlying Practical and Moral Concerns

"The unleashing of power of the atom bomb has changed everything except our mode of thinking, and thus we head toward unparalleled catastrophes." Albert Einstein

"If men can develop weapons that are so terrifying as to make the thought of global war include almost a sentence of suicide, you would think that man's intelligence and his comprehension … would include also his ability to find a peaceful solution." President Dwight D. Eisenhower

We must and we can change our course for life is precious.

General George Lee Butler, former Commander-in-Chief of U.S. Strategic Air Command (1991-92) and U.S. Strategic Command (1992-94), was responsible for all nuclear forces of the American Air Force and Navy. His insights should be of paramount concern to all Members of Congress:

'Despite all the evidence, we have yet to fully grasp the monstrous effect of these weapons, that the consequences of their use defy reason, transcending time and space, poisoning the Earth and deforming its inhabitants.' Nuclear weapons are 'inherently dangerous, hugely expensive and militarily

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inefficient.'
General Butler stated that "accepting nuclear weapons as the ultimate arbiter of conflict condemns the world to live under a dark cloud of perpetual anxiety. Worse, it codifies mankind's most murderous instincts as an acceptable resort when other options for resolving conflict fail." He added, 'I have spent years studying nuclear weapons effects...have investigated a distressing array of accidents and incidents involving strategic weapons and forces… I came away from that experience deeply troubled by what I see as the burden of building and maintaining nuclear arsenals … the grotesquely destructive war plans, the daily operational risks, and the constant prospect of a crisis that would hold the fate of entire societies at risk"_[36]_ (aoldb://mail/write/template.htm#_ftn36)
He stated his profound concern regarding how little high-level scrutiny (the U.S. nuclear war plan) had received over the years, and by how readily his military colleagues threw up their hands and rolled their eyes at the grim challenge of converting mathematical estimates of the destructiveness of nuclear arms and the resilience of Soviet structures into dry statistical formulas for nuclear war. (reprinted from R. Jeffrey Smith, Ex-Commander of Nukes Wants to Scrap Them, A Believer No More, The Sacramento Bee, Mar. 29, 1998. See also R. Jeffrey Smith, The Dissenter, The Washington Post, Dec. 7, 1997, at Magazine, W18.)
General Butler had a unique comprehension of how little the matter has been understood in the chambers of decision making:
"'It was all Alice-in-Wonderland stuff,' General Butler says. The targeting data and other details of the war plan, which are written in an almost unfathomable million lines of computer software code, were typically reduced by military briefers to between 60 and 100 slides that could be presented in an hour or so to the handful of senior U.S. officials who were cleared to hear it: 'Generally, no one at the briefing wanted to ask questions because they didn't want to embarrass themselves. It was about as unsatisfactory as could be imagined for that subject matter. The truth is that the President only had a superficial understanding' of what would happen in a nuclear war, Butler says. Congress knew even less because no lawmaker has ever had access to the war plan, and most academics could only make ill-informed guesses."_[37]_ (aoldb://mail/write/template.htm#_ftn37)
We remain in a state of incomplete comprehension largely because the magnitude of the destructive capacity of a nuclear bomb is simply too great to imagine. Moreover, the illogic of this improved means to an unimproved end challenges our fundamental concepts of what we are willing to do to millions of innocent people to protect our own creation, the State.
The UN in its 1991 report found the '(n)uclear weapons represent a historically new form of weaponry with unparalleled destructive potential. A single large nuclear weapon could release explosive power comparable to all the energy released from the conventional weapons used in all past wars.'_[38]_ (aoldb://mail/write/template.htm#_ftn38)
Experts have estimated that the total conventional bombs dropped by United States Air Force amounted to only two megatons for the entirety of WWII, the yield of one or two ordinary nuclear bombs today. _[39]_ (aoldb://mail/write/template.htm#_ftn39)
What exactly does one nuclear bomb do? Former Director of Central Intelligence Stansfield Turner offers his brief description:
The fireball created by a nuclear explosion will be much hotter than the surface of the sun for fractions of a second and will radiate light and heat, as do all objects of very high temperature. Because the fireball is so hot and close to the earth, it will deliver enormous amounts of heat and light to the terrain surrounding the detonation point, and it will be hundreds or thousands of times brighter than the sun at noon. If the fireball is created by the detonation of a 1-MT (megaton) nuclear weapon, for example, within roughly eight- to nine-tenths of a second each section of its surface will be radiating about three times as much heat and light as a comparable area of the sun itself. The intense flash of light and heat from the explosion of a 550-KT weapon can carbonize exposed skin and cause clothing to ignite. At a range of three miles surfaces would fulminate and recoil as they emanate flames. Particles of sand would explode like pieces of popcorn from the rapid heating of the fireball. At 3.5 miles, where the blast pressure would be 5psi, the fireball could ignite clothing on people, curtains and upholstery in homes and

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offices, and rubber tires on cars. At four miles, it could blister aluminum surfaces, and at six to seven miles it could still set fire to dry leaves and grass. This flash of incredibly intense, nuclear-driven sunlight could simultaneously set an uncountable number of fires over an area of close to 100 square miles._[40]_ (aoldb://mail/write/template.htm#_ftn40)
What is the destructive effect of this blast? In his landmark opinion for the International Court of Justice, Judge Christopher Weeramantry made a short list:
Nuclear weapons
1. cause death and destruction; induced cancers, leukemia, keloids and related afflictions;
2. cause gastrointestinal, cardiovascular and related afflictions; continued for decades after their use to induce the health related problems mentioned above;
3. damage the environmental rights of future generations;
4. cause congenital deformities, mental retardation and genetic damage;
5. carry the potential to cause a nuclear winter;
6. contaminate and destroy the food chain;
7. imperil the eco-system;
8. produce lethal levels of heat and blast;
9. produce radiation and radioactive fallout;
10. produce a disruptive electromagnetic pulse;
11. produce social disintegration;
12. imperil all civilizations;
13. threaten human survival;
14. wreak cultural devastation;
15. span a time range of thousands of years;
16. threaten all life on the planet;
17. irreversibly damage the rights of future generations;
18. exterminate civilian population;
19. damage neighboring states;
20. produce psychological stress and fear syndromes--as no other weapons do._[41]_ (aoldb://mail/write/template.htm#_ftn41)
What does this mean in terms of human experience? Please read this bearing in mind that the current arsenals represent nearly one million times the horror that overtook Hiroshima. Takashi Hiroaka, Mayor of Hiroshima testified before the International Court of Justice:
'The atomic bombs dropped on Hiroshima and Nagasaki shattered all war precedent. The mind-numbing damage these nuclear weapons wrought shook the foundations of human existence…
The dropping of the nuclear weapons is a problem that must be addressed globally. History is written by the victors. Thus, the heinous massacre that was Hiroshima has been handed down to us as a perfectly justified act of war. As a result, for over 50 years we have never directly confronted the full implications of this horrifying act for the future of the human race. Hence, we are still forced to live under the enormous threat of nuclear weapons…
Beneath the atomic bomb's monstrous mushroom cloud, human skin was burned raw. Crying for water, human beings died in desperate agony. With thoughts of these victims as the starting point, it is incumbent upon us to think about the nuclear age and the relationship between human beings and nuclear weapons
…
The unique characteristic of the atomic bombing was that the enormous destruction as instantaneous and universal. Old, young, male, female, soldier, civilian – the killing was utterly indiscriminate. The entire city was exposed to the compound and devastating effects of thermal rays, shock wave blast, and radiation…
Above all, we must focus on the fact that the human misery caused by the atomic bomb is different from that caused by conventional weapons. (H)uman bodies were burned by the thermal rays and high-temperature fires, broken and lacerated by the blast, and insidiously attacked by radiation. These forms of damage compounded and amplified each other, and the name given to the combination was "A-bomb disease…"
(T)he bomb reduced Hiroshima to an inhuman state utterly beyond human ability to express or imagine. I feel frustrated at not being able to express this completely in my testimony about the tragedy of the atomic bombing…'

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It is clear that the use of nuclear weapons, which cause indiscriminate mass murder that leaves survivors to suffer for decades, is a violation of international law." _[42]_ (aoldb://mail/write/template.htm#_ftn42)
During the Cold War the deployment of the arsenals of the Soviet Union and the US were designed to ensure nonuse. Not only does it seem that nuclear weapons challenge our capacity of using law and morality to guide our conduct but also reason as well. We have built a device which renders us less secure the more we perfect its effectiveness. Thus, George Kennan, a key figure in developing the architecture of the Cold War said about nuclear weapons:
:
"The readiness to use nuclear weapons against other human beings – against people we do not know, whom we have never seen, and whose guilt or innocence is not for us to establish – and, in doing so, to place in jeopardy the natural structure upon which all civilization rests, as though the safety and perceived interests of our own generation were more important than everything that has taken place or could take place in civilization: this is nothing less than a presumption, a blasphemy, an indignity – an indignity of monstrous dimensions – offered to God!"_[43]_ (aoldb://mail/write/template.htm#_ftn43)
The perverse logic of the Cold War based on having enough destructive capacity at the ready to make a use unthinkable makes no sense at all today. The hair trigger deployments of thousands of warheads between Russia and US renders logic impotent since we are not even enemies. Yet, as if we were acting rationally, we keep these arsenals precisely calibrated and well organized thus efficiently risking the destruction of all human life on the planet.
I would now like to offer a simple legal test that the National Academy has given to these devices followed by the relevant excerpts from statements of recent years of the Nobel Peace Laureates who have gathered at a Summit in Rome, Italy and then close with the entire most recent Nobel Peace Laureates Statement from Gwangju, Korea of June 2006._[44]_ (aoldb://mail/write/template.htm#_ftn44)
My hope is to instill a greater sense of the moral aspect of this issue into our public discourse. At root we are addressing whether this use of the gift of science and technology solves any problem as great as the problem this use has created. I would contend that practically, legally, morally, and militarily it has not. Thus the argument to set the compass point toward abolition is well founded.
The Committee on International Security and Arms Control of the U.S. National Academy of Sciences succinctly summed up the legal analysis of the current posture of international law:
"(T)he International Court of Justice agreed that the threat or use of nuclear weapons is strictly limited by generally accepted laws and humanitarian principles that restrict the use of force. Accordingly, any threat or use of nuclear weapons must be limited to , and necessary for, self-defense; it must not be targeted at civilians, and be capable of distinguishing between civilian and military targets; and it must not cause unnecessary suffering to combatants, or harm greater than that unavoidable to achieve military objectives. In the Committee's view, the inherent destructiveness of nuclear weapons, combined with the unavoidable risk that even the most restricted use of such weapons would escalate to broader attacks, makes it extremely unlikely that any contemplated threat or use of nuclear weapons would meet such criteria." _[45]_ (aoldb://mail/write/template.htm#_ftn45)
Judge Ranjeva, of the ICJ, stated what should be axiomatic in addressing world threats, and by that I mean, threats that impact on not just United States ' interests but the entire planet and generations yet unborn:
"On the great issues of mankind the requirements of positive law and ethics make common cause, and nuclear weapons, because of their destructive effects, are one such issue." _[46]_ (aoldb://mail/write/template.htm#_ftn46)
In a world with many different religions and cultures there are few places where we can look for an expression of global ethical principles and norms. Many would agree that the Nobel Peace Laureates are a sufficiently distinguished group whose opinions should not be lightly ignored. Below are several quotes from Summits of this distinguished group on the subject of nuclear weapons.
From the 2005 Rome Final Statement:
While expressing regret that some African nations spend too much on

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conventional weapons, we commend the entire African continent for becoming a nuclear weapons free zone. It is absurd that the nations with nuclear weapons refuse even to pledge not to use nuclear weapons against all nuclear weapons free nations.

As in past years, we reiterate our insistence that the existence of nuclear weapons is morally unacceptable and condemn military doctrines allowing their use. We demand progress by the nuclear weapons states in fulfilling their disarmament obligations under the Nuclear Non-Proliferation Treaty. The corrosion of the non-proliferation regime is a danger to world peace.
From the 2004 Rome Final Statement:
Preserving and strengthening the Nuclear Non-Proliferation Treaty. We reject double standards and emphasize the legal responsibility of nuclear weapons states to work to eliminate nuclear weapons. We call for continuation of the moratorium on nuclear testing pending entry into force of the Comprehensive Test Ban Treaty, and for accelerating the process of verifiable and irreversible nuclear arms reduction. We are gravely alarmed by the creation of new, usable nuclear weapons and call for rejection of doctrines that view nuclear weapons as legitimate means of war-fighting and threat pre-emption.
From 2003 Rome Final Statement:

The threat of weapons of mass destruction remains with us. We call for an immediate end to the newly resurgent arms race, which is being fueled by a failure to universally ratify a treaty banning nuclear testing, and by doctrines that lower the threshold of use and promote the creation of new nuclear weapons. This is particularly dangerous when coupled with the doctrine of pre-emption.

For some to say that nuclear weapons are good for them but not for others is simply not sustainable. The failure
of the nuclear weapons states to abide by their legal pledge to negotiate the elimination of nuclear weapon, contained in the Nuclear Non-Proliferation Treaty, is the greatest stimulus to their proliferation.

Nuclear weapons are immoral and we call for their universal legal prohibition. They must be eliminated before they eliminate humanity.
For a list of the Nobel Peace Laureates who have endorsed these strong statements, please go to _http://www.nobelforpeace-summit.org/index-en.asp_ (http://www.nobelforpeace-summit.org/index-en.asp)
And most recently the following was issued at the Summit in Gwangju, Korea, which is quoted here in its entirety because of its relevance to the Korean issue:
Gwangju Final Declaration 2006
In Gwangju, the birthplace of modern Korean democracy, we, the Nobel Peace laureates, have reaffirmed our historical responsibility and the hope of human kind to achieve democracy and peace on the Korean Peninsula and the whole world. "The 2006 Gwangju Summit of Nobel Peace Laureates" was held to remember the May 18 Democratic Movement that spurred the democratization of Korea in 1980, and to uphold the spirit of the June 15 South–North Joint Declaration that opened up the way for peace on the Korean Peninsula in 2000. We have gathered in the spirit of the two global events that have occurred on the Korean Peninsula. We will search for, and promote, stable ways to bring lasting peace on the Peninsula and to spread democracy in East Asia. The Summit started from the universal insight discovered over the course of human history that democracy and human rights bring peace; and peace in turn strengthens democracy and human rights. This is not only the spirit of the Nobel Peace Prize but also the purpose of life and the course of action for the Nobel Peace laureates.

The shadows of the Cold War still linger on the Korean Peninsula and the tension and confrontation have become a huge threat to the peace and democracy of not only the Peninsula and East Asia but also the world as a whole.
Meanwhile, there are still many places in Asia where democracy has not yet developed and human rights are being jeopardized. This shows us that trees of democracy and peace do not grow easily and that without endless efforts these trees

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will not grow and sometimes even wither. In this respect, the historical responsibility and common action of the Nobel Peace laureates are all the more crucial. Based upon our strong friendship and common philosophy, we will go to areas where democracy and peace are under threat, wherever that may be, and do our best to fulfill our role and responsibility.

Our practical actions aspire to affirm universal shared values such as compassion, love, justice, forgiveness and generosity.

Based on such goal and philosophy, we, the Nobel Peace laureates, pledge and propose the following:

Global Issues

1. All countries around the world must endlessly strive to further develop democracy and peace, and this must be pursued not by use of force or violence but through peaceful means such as non-violence, forgiveness and reconciliation.
2. There are still many areas not only in Asia but in all parts of the world where democracy and human rights are under oppression. International cooperation, and multilateralism based on the rule of law must be strengthened. Not only political human rights, but also the more basic social human rights such as the right to eat, to receive medical treatment, to be educated and to live in peace must be achieved.
3. Without rooting out poverty we cannot expect development in democracy and human rights, nor can we end terrorism and war. Along with humanitarian emergency aid, the international community needs long-term efforts to reduce poverty and bring sustainable economic development. We urge the G8 leaders meeting in St Petersburg on July 15th to fulfill the Millennium Development Goals for Africa and its peoples, especially through debt cancellation.
4. To ensure a sustainable future we call for: a. Recognition and full implementation of women's rights and the full implementation of Security Council Resolution 1325 on women's role in the peace process; b. Promotion of a culture of peace where security is defined to always focus on meeting human needs with substantial reductions in military spending thus freeing up enormous resources; c. Recognition in action not just rhetoric that without a healthy environment the human community cannot survive; d. Enhancing cooperation amongst people in addressing our collective needs through rendering the institution of war as obsolete as apartheid, slavery and colonization.
5. For the resolution to international disputes and for world peace, the active role of the United Nations must be respected. All countries should do their utmost to closely cooperate with the UN to resolve current global disputes and promote democracy through peaceful diplomatic measures.

Korean Issues

1. The May 18 Democratic Movement and the signing of the June 15 South-North Joint Declaration were historic events contributing to democracy and peace not only on the Korean Peninsula but in Asia and the whole world. We, the Nobel Peace laureates, will do our best to uphold the vision and philosophy of both events.
2. The Korean Peninsula remains the only place on earth where the darkest shadows of the Cold War still linger. We call for more active cooperation and efforts of the two Koreas, and also the concerned nations such as the United States, Japan, China and Russia, and international organizations such as the United Nations to pursue inter-Korean reconciliation and cooperation and end the state of war on the Peninsula to bring lasting peace in the region. As a modest step to enhance such cooperation, we advocate conversion of the DMZ into a de-mined Peace Park, an environmental reserve for the benefit of all people.
3. The tension and confrontation surrounding the North Korean nuclear issue must be resolved. We urge all parties to resume the Six Party Talks in the spirit of mutual respect and equality. In order to advance this important process, we expect that the DPRK will completely abandon its nuclear weapons policy and accept international inspections. We also call for the US to end financial and economic sanctions on the DPRK and offer security guarantees. All parties should avoid any further obstacles to progress. All parties should

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fully implement the "Beijing Joint Statement" of September 19, 2005. The Six Parties should cooperate to ensure safe, peaceful energy security for the DPRK and implement economic cooperation in the fields of energy, trade and investment, bilaterally and multilaterally. We urge the United Nations and all nations involved to pursue inter-Korean reconciliation and cooperation and end the state of war on the Peninsula to bring lasting peace in the region.

4. We propose that the six-party talks should not be a temporary meeting to resolve the North Korean nuclear issue and bring lasting peace on the Peninsula but be developed into a permanent multilateral organization to promote peace and democracy on the Korean Peninsula.

Nuclear weapons

1. If we are to have stability we must have justice. This means the same rules apply to all. Where this principle is violated disaster is risked. In this regard we point to the failure of the nuclear weapons states to fulfill their bargain contained in the Nuclear Nonproliferation Treaty to negotiate the universal elimination of nuclear weapons. To pursue a nuclear-weapons-free Korean Peninsula or Middle East or South Asia, without credible commitment to universal nuclear disarmament is akin to a parent trying to persuade his teenagers not to smoke while puffing on a cigar. There are steps available to make progress in this area and they include:

a. Completing a treaty with full verification mechanisms cutting off further production of highly enriched uranium or plutonium for weapons purposes;
b. Universal ratification of the Comprehensive Test Ban Treaty, now ratified by 176 nations;
c. Taking the arsenals of Russia and the US off of hair trigger, launch on warning high alert;
d. Legally confirmed pledges by all states with nuclear weapons never to use them first;
e. Making cuts in the US and Russia's arsenal irreversible and verifiable. (Italics added)

* * *

We, the Nobel Peace laureates, pledge to pursue joint efforts and strengthen cooperation for the development of democracy, peace and human rights on the Korean Peninsula and the world as a whole.—June 17, 2006, At the closing of the "2006 Gwangju Summit of Nobel Peace Laureates"

- Mikhail Gorbachev, Nobel Peace Laureate 1990
- Kim Dae-jung, Nobel Peace Laureate 2000
- Mairead Corrigan Maguire, Nobel Peace Laureate 1976
- Shirin Ebadi, Nobel Peace Laureate 2003
- Wangari Muta Maathai, Nobel Peace Laureate 2004
- International Peace Bureau (IPB), Organization awarded Nobel Peace Prize 1910
- American Friends Service Committee (AFSC), Organization awarded Nobel Peace Prize 1947
- Amnesty International (AI), Organization awarded Nobel Peace Prize 1977
- International Physicians for the Prevention of Nuclear War (IPPNW), Organization awarded Nobel Peace Prize 1985
- Pugwash Conferences on Science and World Affairs, Organization awarded Nobel Peace Prize 1995

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(aoldb://mail/write/template.htm#_ftn47) Please e-mail your comments by April 10, 2008 to ComplexTransformation@nnsa.doe.gov

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_[1]_ (aoldb://mail/write/template.htm#_ftnref1) In the case of India, facing a Chinese arsenal, it made clear during NPT negotiations that a process of global elimination of nuclear weapons would be required for it to forgo the option of acquiring its own. Given that India's traditional commitment to nuclear disarmament dates back to the days of Gandhi and Nehru, I am convinced that India, as it repeatedly says in international forums, would participate in a disarmament process. The United States and India are now seeking to create an arrangement under which India would accept safeguards on civilian but not military nuclear facilities in return for access to civilian nuclear fuel and technology. While the proposed deal would partially engage India in the nonproliferation system, it undermines a core bargain of the NPT: that countries renouncing nuclear weapons are promised access to peaceful uses of nuclear technology, and would indirectly augment India's capability to produce fissile materials for weapons. It is therefore unacceptable as currently framed. Minimal criteria for approval of the deal by the U.S. Congress should be entry into force of a verified Fissile Materials Cut-off Treaty and the Comprehensive Nuclear-Test-Ban Treaty as well as India's formal acceptance of the NPT obligation of good-faith negotiation of cessation of arms racing and nuclear disarmament. The need to prevent arms racing in South Asia is highlighted by recent reports that Pakistan is constructing a new plutonium production reactor and the announcement that the United States is going ahead with the long-blocked sale of F-16 fighter aircraft to Pakistan.

_[2]_ (aoldb://mail/write/template.htm#_ftnref2) Weapons of Mass Destruction Commission, Final Report, Weapons of Terror: Freeing the World of Nuclear, Biological, and Chemical Arms (Stockholm, June 1, 2006) ("Weapons of Terror") 71-72.

_[3]_ (aoldb://mail/write/template.htm#_ftnref3) See Thomas Graham, Jr., Commonsense on Weapons of Mass Destruction (2004) 10.

_[4]_ (aoldb://mail/write/template.htm#_ftnref4) 1995 Review and Extension Conference of the Parties to the Treaty on the Non-Proliferation of Nuclear Weapons, Decision 2, "Principles and Objectives for Nuclear Non-Proliferation and Disarmament," Final Document, Part I, NPT/CONF.1995/32, Annex: Access at http://disarmament2.un.org/wmd/npt/1995nptrevconfdocs.html.

_[5]_ (aoldb://mail/write/template.htm#_ftnref5) International Court of Justice, "Legality of the Threat or Use of Nuclear Weapons," Advisory Opinion of 8 July 1996, ICJ Reports (1996): 226, para. 105(2)F. Online at http://www.icj-cij.org/icjwww/icases/iunan/iunanframe.htm.

_[6]_ (aoldb://mail/write/template.htm#_ftnref6) 2000 Review Conference of the Parties to the Treaty on the Non-Proliferation of Nuclear Weapons, Final Document, Vol. I, NPT/CONF.2000/28, Part I: 14-15. Access at http://disarmament.un.org/wmd/npt/finaldoc.html. The headings in bold in the text are provided for convenience and are not part of the Final Document.

_[7]_ (aoldb://mail/write/template.htm#_ftnref7) Evidence of the near-consensus is provided by UN General Assembly resolutions, notably the 2005 "Renewed Determination" resolution sponsored by Japan and nine other countries from both the North and South. It received the support of the vast majority of states, with 162 countries voting for it and only two against, the United States and India, with seven abstentions. A/RES/60/65; access at http://www.un.org/Depts/dhl/resguide/r60.htm.

_[8]_ (aoldb://mail/write/template.htm#_ftnref8) See Middle Powers Initiative, "Fulfilling the NPT Bargain for Disarmament and Non-Proliferation: Next Steps," Briefing Paper for the Third Meeting of the Article VI Forum, Ottawa, September 28-29, 2006.

_[9]_ (aoldb://mail/write/template.htm#_ftnref9) The current U.S. position is that extensive verification mechanisms could compromise the core national security interests of key parties, would be so costly that many countries would be hesitant to implement them, and still would not provide high confidence in the ability to monitor compliance. However, the International Panel on

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Fissile Materials and the Weapons of Mass Destruction Commission have persuasively refuted the argument against verifying the FMCT. See International Panel on Fissile Materials, Global Fissile Materials Report 2006, pp. 43-49, online at http://www.fissilematerials.org/ipfm/site_down/ipfmreport06.pdf; Weapons of Terror at 104.

_[10]_ (aoldb://mail/write/template.htm#_ftnref10) Weapons of Terror at 93.

_[11]_ (aoldb://mail/write/template.htm#_ftnref11) "Verification of nuclear disarmament: final report on studies into the verification of nuclear warheads and their components," working paper submitted by the United Kingdom of Great Britain and Northern Ireland to the 2005 NPT Review Conference, NPT/CONF.2005/WP.1, and previous working papers cited therein. Online at http://www.reachingcriticalwill.org/legal/npt/RevCon05/wp/verification_UK.pdf.

_[12]_ (aoldb://mail/write/template.htm#_ftnref12) Committee on International Security and Arms Control, National Academy of Sciences, Monitoring Nuclear Weapons and Nuclear-Explosive Materials: An Assessment of Methods and Capabilities (2005). Online at http://www.nap.edu/catalog/11265.html.

_[13]_ (aoldb://mail/write/template.htm#_ftnref13) Id. at 219-220.

_[14]_ (aoldb://mail/write/template.htm#_ftnref14) See estimates by Bruce Blair, president of the Center for Defense Information, cited in John Burroughs, "The Man Who Averted Nuclear War," DisarmamentActivist.org, January 19, 2006.

_[15]_ (aoldb://mail/write/template.htm#_ftnref15) E.g., David E. Mosher, Lowell H. Schwartz, David R. Howell, and Lynn E. David, Beyond the Nuclear Shadow: A Phased Approach for Improving Nuclear Safety and U.S.-Russian Relations (RAND, 2003). Online at http://www.rand.org/publications/MR/MR1666.

_[16]_ (aoldb://mail/write/template.htm#_ftnref16) Committee on Technical Issues Related to Ratification of the Comprehensive Nuclear Test Ban Treaty, National Academy of Sciences, Technical Issues Related to the Comprehensive Nuclear Test Ban Treaty (Washington: National Academy Press, 2002). Access online at http://newton.nap.edu/catalog/10471.html.

_[17]_ (aoldb://mail/write/template.htm#_ftnref17) Weapons of Terror at 99.

_[18]_ (aoldb://mail/write/template.htm#_ftnref18) Bruno Tertrais, "Nuclear policy: France stands alone," Bulletin of the Atomic Scientists (July/August 2004) 48-55.

_[19]_ (aoldb://mail/write/template.htm#_ftnref19) Robert S. Norris and Hans M. Kristensen, NRDC Nuclear Notebook, "Russian Nuclear Forces, 2006," Bulletin of the Atomic Scientists (March/April 2006) 64-67.

_[20]_ (aoldb://mail/write/template.htm#_ftnref20) Jonathan Medalia, Congressional Research Service, Nuclear Weapons: The Reliable Replacement Warhead Program (updated March 9, 2006); Amb. Linton Brooks, Administrator, National Nuclear Security Administration, "The Future of the U.S. Nuclear Weapons Stockpile," 2006 Arms Control Association Panel Discussion, January 25, 2006. Online at http://www.armscontrol.org/pdf/20060125_brooks.pdf.

_[21]_ (aoldb://mail/write/template.htm#_ftnref21) Michael Smith, "Focus: Britain's secret nuclear blueprint," The Sunday Times, March 12, 2006.

_[22]_ (aoldb://mail/write/template.htm#_ftnref22) Brooks, supra.

_[23]_ (aoldb://mail/write/template.htm#_ftnref23) Office of the Deputy Assistant to the Secretary of Defense for Nuclear Matters, "Stockpile Transformation," http://www.acq.osd.mil/ncbdp/nm/stockpiletransformation.html (accessed September 16, 2006).

_[24]_ (aoldb://mail/write/template.htm#_ftnref24) Robert S. Norris and Hans

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M. Kristensen, NRDC Nuclear Notebook, “U.S. Nuclear Forces, 2006,” Bulletin PC_1898
of the Atomic Scientists (January/February 2006) 68-71; Greg Mello, “That
Old Designing Fever, Bulletin of the Atomic Scientists (January/February 2000)
51-57.

_[25]_ (aoldb://mail/write/template.htm#_ftnref25) In a January 19, 2006
speech, President Jacques Chirac said: “[N]uclear deterrence is not intended to
deter fanatical terrorists. Yet, the leaders of States who would use
terrorist means against us, as well as those who would consider using, in one way or
another, weapons of mass destruction, must understand that they would lay
themselves open to a firm and adapted response on our part. And this response
could be a conventional one. It could also be of a different kind.” Online at
http://www.acronym.org.uk/docs/0601/doc06.htm.

_[26]_ (aoldb://mail/write/template.htm#_ftnref26) “Nuclear Posture Review
[Excerpts] Submitted to Congress on 31 December 2001” ("NPR Excerpts"). Online
at http://www.globalsecurity.org/wmd/library/policy/dod/npr.htm.

_[27]_ (aoldb://mail/write/template.htm#_ftnref27) Joseph Cirincione,
Director, Non-Proliferation Project, Carnegie Endowment for International Peace,
Testimony to the Senate Committee on Foreign Relations, May 16, 2002.

_[28]_ (aoldb://mail/write/template.htm#_ftnref28) NPR Excerpts; William M.
Arkin, Commentary, “Secret Plan Outlines the Unthinkable,” Los Angeles
Times, March 10, 2002; Walter Pincus, "U.S. Nuclear Arms Stance Modified by
Policy Study," Washington Post, March 23, 2002. Pincus wrote that the NPR “would
give U.S. presidents the option of conducting a preemptive strike with
precision-guided conventional bombs or nuclear weapons” against “hostile countries
that threaten to use weapons of mass destruction.”

_[29]_ (aoldb://mail/write/template.htm#_ftnref29) NPR Excerpts.

_[30]_ (aoldb://mail/write/template.htm#_ftnref30) National Strategy to
Combat Weapons of Mass Destruction (December 2002) 3.

_[31]_ (aoldb://mail/write/template.htm#_ftnref31) E.g., U.S. Department of
Defense, Strategic Deterrence Joint Operating Concept (February 2004) 32-33.
Online at http://www.dtic.mil/jointvision/sd_joc_v1.doc. "Joint Operating
Concepts" are part of a set of planning documents intended "to assist in the
development of enhanced joint military capabilities needed to protect and
advance U.S. interests." The goal is "to realize the Chairman's vision of
achieving Full Spectrum Dominance by the Joint Force." Id. at 1.

_[32]_ (aoldb://mail/write/template.htm#_ftnref32) “The Role of Nuclear
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Joint
Strategic Target Planning Staff Strategic Advisory Group Deterrence Study
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Chief of Naval Operations for Plans, Policy and Operations, Stratplan 2010 Phase
II, Final Report (June 1992), V.I, pp.92-93, obtained through the Freedom of
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Granoff, Jonathan

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July 10, 2006.

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organization the International Peace Bureau delegations to the Nobel Peace
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_http://www.gsinstitute.org/docs/IPB_NobelSummitReports.pdf_
(http://www.gsinstitute.org/docs/IPB_NobelSummitReports.pdf) >; see also the official web

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Granoff, Jonathan
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site
of the Summits at <http://www.nobelforpeace-summit.org >

PC_1898

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(http://travel.aol.com/travel-guide/united-states?ncid=aoltrv00030000000016)

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Grant, Sarah
Page 1 of 1

PC_1528

Levens, Matthew

From: Sarah Grant [sgrant@cybermesa.com]
Sent: Sunday, April 27, 2008 9:32 PM
To: Complex2030
Subject: Agricultural Land in Northern Nev Mexico

April 28, 2008

Mr. Theodore Wyka
C-T SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Re: Public Comment to the draft Complex Transformation Supplemental Programmatic Environmental Impact Statement, DOE/EIS-0236-S4

Dear Mr. Wyka,

The Department of Energy (DOE) is proposing Complex Transformation, with a focus for expanding nuclear weapons manufacturing at Los Alamos National Laboratory (LANL).

1|2E.1 I live in Santa Fe and have worked with farmers markets throughout the state since 1994. I just learned of the transformation complex document and request a 90-day extension of time to provide informed public comments to DOE.

My primary concern at this point is that DOE states "there are no agricultural activities present at LANL, nor are there any prime farmlands in the vicinity." p. 4-2. For DOE, a "vicinity" or "region of influence" is generally an area within a 50-mile radius of its facility.

The farmers markets in Santa Fe, Espanola, Los Alamos, Eldorado and Taos all host vendors who farm within a 50 mile radius of LANL. The total revenues of these markets combined is in the vicinity of 2.5 million dollars. This is a significant amount that impacts the lives of the farmers and the consumers they serve. The DOE claim that there are no prime

2|14A farmlands in the vicinity of LANL is wrong. It is accurate to say that LANL is located within a food basket of Northern New Mexico.

3|11D I would like DOE to retract the draft Complex Transformation Supplemental Programmatic Environmental Impact Statement and reassess the LANL impacts to agriculture. Then DOE must submit the revised draft to the public for review and public comment.

Sincerely,
Sarah Grant
New Mexico Farmers Marketing Association 320 Aztec St, Suite B Santa Fe, NM 87501
505-983-4010

Gray, Jim
Page 1 of 1

PC_1627

Levens, Matthew

From: jbrgray@verizon.net
Sent: Saturday, April 05, 2008 9:08 PM
To: ComplexZ030
Subject: Complex Transformation SPEISComments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|16A Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE should focus on shrinking the still-oversized nuclear weapons complex and on maintaining the safety and security of our existing weapons arsenal as the size of our nuclear stockpile is reduced.

I ask that you include my comment as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project.
Thank you.

Sincerely,
Jim. Gray
40492 Marsha Ct.
Hemet, CA 92544

cc:
Senator Dianne Feinstein
Senator Barbara Boxer
Representative Mary Bono

Gray, Lance
Page 1 of 2

Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement—U.S. Department of Energy National Nuclear Security Administration

PC_995

Written Comment Form

Must be received on or before April 10, 2008.

1|3A It is not clear to me why you need so many new pits. We are no longer in an arms race with anyone.

2|5B It is my understanding that the alternative of actually reducing quickly reducing our nuclear stock pile and using Los Alamos and those other facilities for some useful purpose like increasing our energy sustainable energy technologies was taken off the table at the beginning of the process.

I don't want more unnecessary nuclear arms production at Los Alamos

3|14O Given the long history of pollution the water, soil and air of Norther New Mexico, and the similar result of pit production at Rocky Flats; given LANL & the DOE, the DoD's long record of human rights abuses to the local land owners and low level workers; given the continuous security lapses at LANL, and given LANL's inability to (over

Lance Gray
PO Box 13
Llano, NM 87543

Please use other side if more space is needed.

Comment forms may be mailed to:
Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Comment forms may be faxed to:
(703) 931-9222
or sent by electronic mail to:
complextransformation@nnsa.doe.gov

You may also submit comments through the project website which can be found at:
http://www.complextransformationspeis.com

Española, NM

Gray, Lance
Page 2 of 2

clean up their previous ~~mess~~ damage to the groundwater, the soil, and air;

3|140 (cont.)

I ~~appreciate~~ don't see how you can consider increasing LANL's ability to damage the soil, water, and air of this area.

Gray, Marlene
Page 1 of 2

Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

PC_996

Written Comment Form

Must be received on or before April 10, 2008.

Public speaker/orator would never describe me. I am a citizen of this great country. But more specifically, I am a citizen of Northern New Mexico. AND, I am a human being - first and foremost.

It is time that the peoples of New Mexico cease to be the throw away people. The health and environmental concerns of New Mexicans have too long been ignored!

1|140 What a sad commentary it is when - in such a pristine countryside - our children have to be cautioned against eating the fruits and produce of the ground because the pollution from Los Alamos has made it unsafe!

The call is for more development of nuclear "triggers". The expiration of the existing ones is far from being over. Why? Why? The needful use of Los Alamos' engineers - brainpower - would be far more beneficially utilized

2|9B in working to develop alternative energy solutions. All we are saying is give peace a chance..." →

Marlene Gray, Box 13, Llano, NM 87543

Please use ~~other~~ side if more space is needed.

Comment forms may be mailed to:
Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

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complextransformation@nnsa.doe.gov

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Española, NM

Gray, Marlene
Page 2 of 2

no longer vying for position in the nuclear race.

The idea that jobs would be jeopardized is bunk.

2|9B (cont.) Engineers can engineer something besides nuclear warheads! How about sustainable energy?

All we are saying is NO MORE!!

I know that nothing we do or say here tonight will make a hell of difference in the decision making. It is obvious that that decision has been made... "the die is cast."

Gray, Todd
Page 1 of 1

PC_1877

Levens, Matthew

From: Todd Gray [info@dillyshop.com]
Sent: Friday, March 28, 2008 6:29 PM
To: Complex2030
Subject: Stop new nukes

Todd Gray
1121 North Eastman Road
Kingsport, TN 37664-3156

March 28, 2008

Complex Transformation

Dear Complex Transformation:

1|16A I am opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal.

2|9A We should spend the billions proposed for this plan on programs to eliminate nucleaer weapons or on education for up and coming generations or universal health care reform or creating new jobs to help pull the economy out of recession or securing our borders and intellegence agencies so that we would no longer need the option of nuclear weapons world wide or repainting the White House red or a dozen other things I do not feel like writing down but that are most assuredly money better spent than rebuilding a nuclear arsenal.

Sincerely,

Todd Gray

1

Green, Beth
Page 1 of 1

PC_1717

Levens, Matthew

From: Beth Green [bsliski@bellsouth.net]
Sent: Wednesday, April 02, 2008 8:19 PM
To: Complex2030
Subject: Complex Transformation Comments from SPEIS Public Hearing in Oak Ridge

Mr. Wyka,

1|15A I attended the public hearing held in the evening at Y-12 in Oak Ridge. I believe most people do not understand several things about Y-12, like how safe the plant is, how well run it is, how creative and cooperative the work force is, how willing the employees are to accomplish whatever the next task is out there for Y-12. Many of those speaking at the hearing truly do not understand the work done at the plant and the role the plat plays in the security of our country. It is my belief that DOE would be making an expensive and tactical mistake to move any of the Y-12 functions any where else in the complex.

Thank you for giving us the opportunity to comment on the proposals.
Beth Green

1

Green, James
Page 1 of 1

PC_534

Buenaflor, Justin

From: Jim Green [Jimvert@charter.net]
Sent: Monday, April 07, 2008 8:52 AM
To: Complex2030
Subject: BOMBS AWAY!

The bombardier's comments as he dropped conventional weapons on an enemy now now has new meaning in a highly populated and very tense world. The work of nations with human and technological resources should be to rid the planet of weapons that can, and, without thoughtful vigilance, will destroy both cultures and the natural world.

The same degree of intelligence that can increase the world-wide nuclear stockpile can with sensitive diplomacy begin the world-wide reduction of the nuclear threat.

1|1J; 2|3A

As a nation we have committed to the long-term process of reducing the nuclear threat. Since we now have an abundant arsenal of nuclear bombs that have a life span of many years the logic behind proliferation is seriously flawed. A nation that can put a man on the moon and is planning to send humans to Mars can surely find the intellectual and spiritual resources to lead the world in what may be the greatest challenge in human history, namely, to lead the civilized world to give new meaning to: "Bombs Away!"

James R. Green

1

Green, Jeanne
Page 1 of 2

Jeanne Green Taos NM 575 ~~505~~ 751-4130
submitted Mar 13 SPEIS hearing - Santa Fe

1|16A As a member of the common people, I and we demand that Los Alamos National Laboratory be closed. The U.S. is already in
2|1F violation of the Nuclear Non-Proliferation Treaty. Ramping up production of new nuclear weapons makes the U.S. the rogue state of the world with 24,000 nuclear bomb pits already in existence. We do not need more nuclear bombs. We do not need Any nuclear bombs. The nuclear bombs we do have- have become a liability instead of a means of security. Presently, unidentified individuals can
3|13A.1 perform terrorist acts at any place or time, and the huge amounts of plutonium and radioactive wastes located at nuclear production sites across our country, from sea to shining sea, (including nuclear power facilities that produce plutonium) make our country all the more endangered. Nuclear bombs are no longer a deterrent. Nuclear bomb facilities are, instead, making us all the more vulnerable to attack. One thousand nine hundred and fourteen nuclear bombs sit within the greater Albuqerque area, only one mile from the airport. The nuclear bomb industry does not take into consideration the lives and welfare of the over half million people living there. There is no plan for
4|14M.3 a safe evacuation in the case of an accident or terrorist attack. That is because there is no way to protect ourselves from such an event that would spew deadly radioactive contamination everywhere. The same is true for Los Alamos. With tons of radioactive waste sitting above ground in barrels at LANL, New Mexicans are, even now, being exposed to carcinogenic and mutagenic toxins in our air, water, soil and food. New Mexicans are becoming (in the sterile language of our corporate war-profiteering Administration) "collateral damage". Upping production will quadruple the risks and casualties, especially among the sacrificial Native American populations near the bomb factory.

The Los Alamos nuclear industry began in secrecy, without the knowledge or permission of the people in this democracy, without even the Vice President's knowledge at the time. This legacy of secrecy and profit-making over the heads of our citizens makes a mockery of democracy. The secrecy continues unabated with unmarked highly-radioactive shipments traveling our highways, making all citizens vulnerable to exposure to the most deadly
5|7J materials known to humankind.

The mandate for LANL from the people is to clean up the massive contamination at Los Alamos. Then, if the area is at all inhabitable, put our talented, exquisitely-intelligent scientists to work researching

PC_1032

santa Fe, NM

Green, Jeanne
Page 2 of 2

6|9B sustainable energy alternatives to secure our future and mitigate the effects and speed of global warming.
No more plutonium pits. No where. No way. The nuclear bomb industry is obsolete and a dead end for New Mexicans and the world.
Thank you.

Green, Ricky
Page 1 of 1

PC_290

Draft Complex Transformation
Supplemental Programmatic
Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

Written Comment Form

Must be received on or before April 10, 2008.

I ~~live~~ down wind from
los Alamos in Carson Estates
New mexico and I am very
worried about the health of
everyone living down wind.
I was out one day when
a fire was burning in Los
Alamos and the smoke was
very thick. I am dealing with poor
health that can not be diagnosed
and fear I may have been exposed
to the fallout from the fire. The
trees that have grown around Los
Alamos have been absorbing radiation
for 50 years and when the fire burned
them in 2001 that accumulated radiation
was released and sent up with the
smoke. Please no more radiation
release, we have had enough.
Ricky Green Taos, NM

1|14O

Please use other side if more space is needed.

Comment forms may be mailed to:
Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Comment forms may be faxed to:
(703) 931-9222
or sent by electronic mail to:
complextransformation@nnsa.doe.gov

You may also submit comments through the project website which can be found at:
http://www.complextransformationspeis.com

Greene, Paige
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PC_679

Levens, Matthew

From: Paige Greene [hellmom45@yahoo.com]
Sent: Wednesday, January 30, 2008 7:11 PM
To: Complex2030
Subject: Reject Complex 2030!

Mr. Wyka:
I am sending this letter to the Department of Energy as well as my Senators and Representative to inform them of this potentially disastrous issue.

As someone who would be directly affected by the production of new nuclear weapons, I wholeheartedly reject the proposed Complex 2030 and ask you not to fund this dangerous and detrimental program.

1|5C I — Our current nuclear weapons stock hold does not require any replacement ? recent studies have shown that plutonium lasts twice as long as we had previously thought.

2|14O — New facilities and renewed production of nuclear warheads would create massive new health and environmental concerns ? and we are still suffering from the severe consequences of current nuclear weapons facilities and previous nuclear tests on our environment and collective health. As we tout the importance of environmental responsibility in an age where global warming and carbon emissions threaten future generations, it is socially irresponsible to add unnecessary and dangerous weapons to our existing stockpile.

3|1F
4|1J — Complex 2030 is in direct contradiction with the many nuclear non-proliferation and disarmament treaties that the United States has signed over several decades. We must follow the Nuclear Non-proliferation Treaty we signed in 1968 and pursue disarmament as a real political goal, and we cannot do that by starting to produce new nuclear weapons. Complex 2030 would increase the number of nuclear weapons to the level the U.S. had during the Cold War.

4|1J (cont.) — If we break our word on these treaties and add to the global number of nuclear weapons, we lose all authority when we ask other nations (such as Iran or North Korea) not to add to their own nuclear weapons technology. Funding Complex 2030 would raise the stakes for all nations equipped with nuclear technology.

5|9H
6|9B — Lastly, this dangerous and unnecessary project would cost hundreds of billions of dollars to American taxpayers that could be used to eliminate our national deficit or improve social programs.

7|16A — Please consider these very possible ramifications of Complex 2030 as you plan to accept or reject this new nuclear weapons program. If you choose to pursue Complex 2030, I know that my tax dollars, my environment, and my children will feel the negative ? and potentially catastrophic ? consequences for years to come.

5|9H (cont)
6|9B (cont) — The money proposed for Complex 2030 should be used for programs to develop our greatest resource - our citizens. Education, health care and hunger are just a few examples. Let's, make positive change.

I look forward to hearing how you will act on this important issue.

Paige Greene
230 Glensprings Circle
CANONSBURG, PA 15317

1

Greenleaf, Phyllis

Page 1 of 1

PC_694

Levens, Matthew

From: phyllis greenleaf [phyllisgreenleaf@gmail.com]
Sent: Wednesday, March 12, 2008 12:40 AM
To: Complex2030
Subject: NO MORE $ FOR EXPANSION OR RESTARTING OF NUCLEAR WEAPONS PROGRAM

phyllis greenleaf
1555 merrill st. #75
Santa Cruz, CA 95062-4029

March 12, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|1J yOU probably know that the Bush administration is planning to build a plant to produce plutonium pits for nuclear weapons. Im sure you agree that building this new plant would send a contradictory message to other countries, such as Iran, who may be seeking nuclear weapons.
While the U.S. is asking others to forego developing nuclear arsenals, we are simultaneously trying to increase our own capacity to build new nuclear weapons.

You also must know that Bush's military people are seeking money to modify nuclear facilities across the nation, laying the groundwork for rebuilding a nuclear arsenal.....

AND WE TELL THE REST OF THE WORLD TO STOP DEVELOPING NUCLEAR WEAPONS!!!!

2|16A pLEASE WORK TO REJECT THIS NEW CMRR PROJECT..... its both immoral and irresponsible.

Sincerely,

phyllis greenleaf

1

Greenless, Gail

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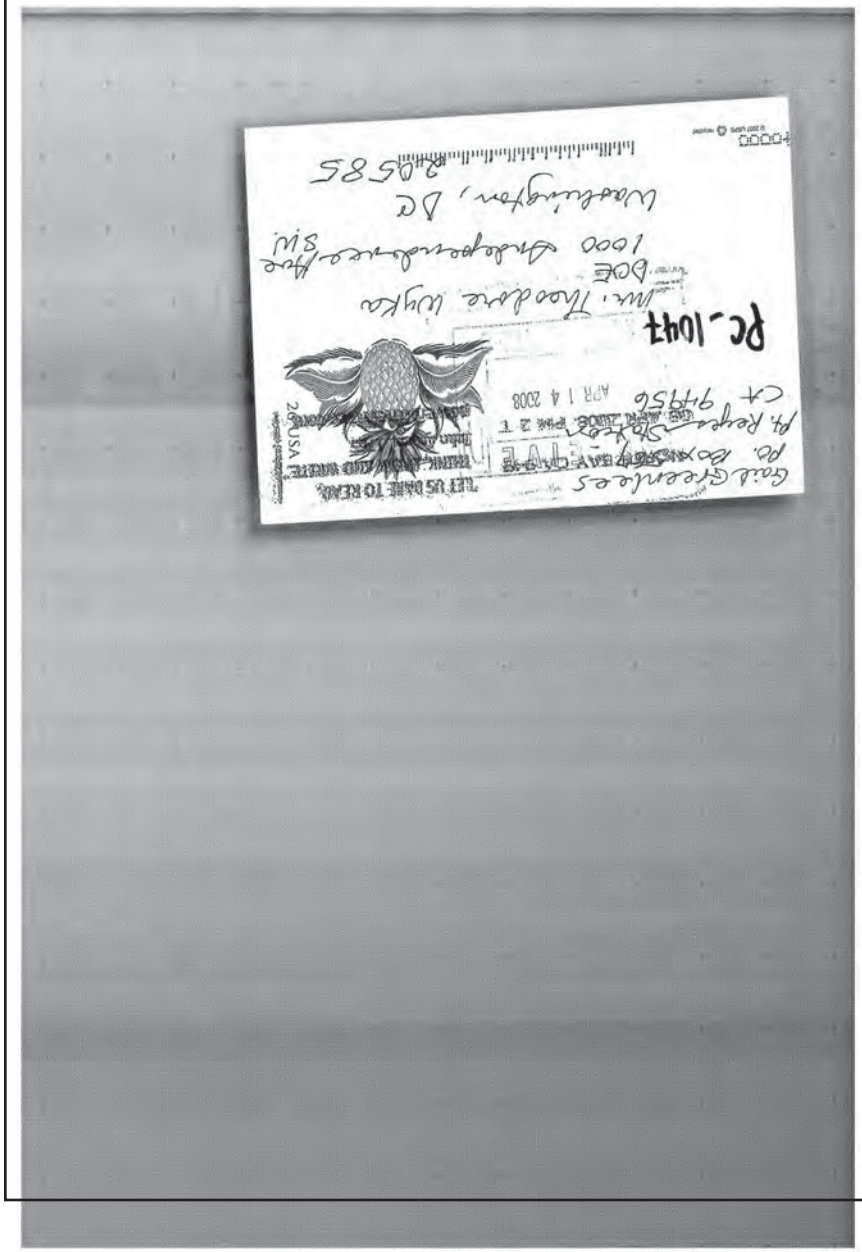
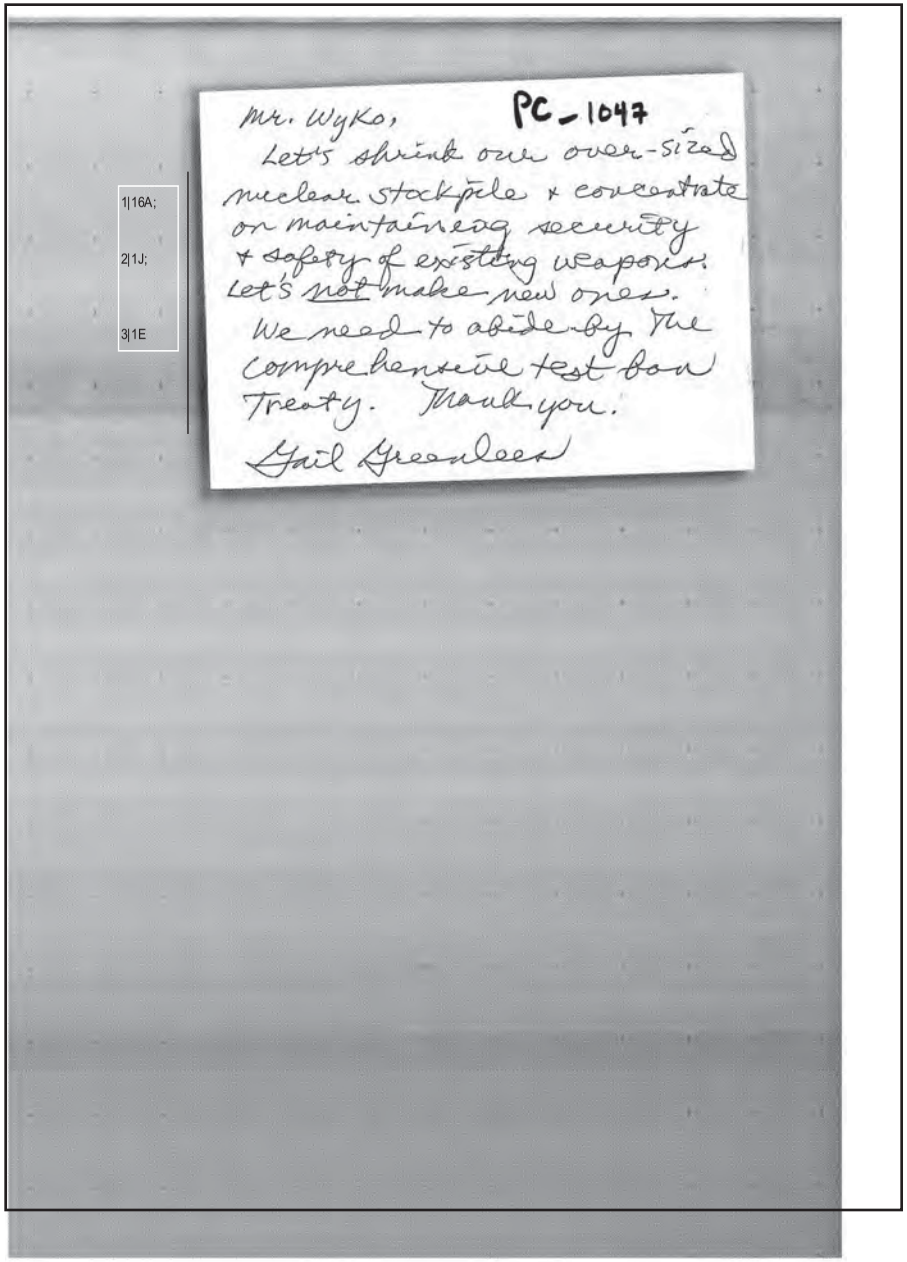


Greenless, Gail
Page 2 of 2



PC-1047

Mr. Wyka,

Let's shrink our over-sized nuclear stockpile & concentrate on maintaining security & safety of existing weapons. Let's not make new ones.

We need to abide by the comprehensive test ban Treaty. Thank you.

Gail Greenlees

1|16A;
2|1J;
3|1E

Greenwald, Janet
Page 1 of 3

PC_918

CARD (1)

Theodore Wyka
Complex Transformation SPEIS
Document Manager
Office Transformation NA-10 1
US Department of Energy/NNSA
1000 Independence Ave, SW
Washington, DC 20585

Dear Mr. Wyka,

These are comments submitted by Citizens for Alternatives to Radioactive Dumping on the Complex Transformation SPEIS.

The position of our organization is that we need the Federal Government to clean up our land air and water, not produce more bombs.

1|7J

The monitoring networks for LANL and SNL national labs are inadequate, both air and water.

2|10B;
3|10G

In the drinking water wells of Los Alamos are strontium 90, neptunium, americium, neptunium, plutonium, cesium.

4|14O;
5|10E

It will take billions upon billions of dollars to clean up the contamination in our state.

6|9D

Greenwald, Janet
Page 2 of 3

CARD (2)

caused by bomb-making.

7|14D
At SNL, we are concerned about the neutron generator. There is no air monitoring for tritium at this facility as there is not at all SNL facilities, nor is there air monitoring in any of the possible emissions from the bombardment of plutonium i.e. plutonium itself.

8|14M
We are concerned about the 700,000 cubic feet of waste in the mixed waste landfill, perched above our drinking water aquifer.

We are concerned about the solid waste management units at SNL; these units consist of ditches, septic tanks and drainfields. According to records unearthed by the NGO Citizen Action, 555,000,000 gal./year have been placed in these SMUs consisting of waste water from projects associated with bomb-making. There are no wells monitoring these units. We are outraged by the neglectful attitude of SNL toward our land and drinking water aquifer.

Greenwald, Janet
Page 3 of 3

CARD (3)

8|14M (cont.)
We are concerned about the Hydro testing facilities which openly burn high test explosives.

7|14D (cont.)
We are concerned about the Thermal Test Unit where slurries of toxic waste are to be burned in the open air without monitoring and without public notice.

(Complex Transformation)

9|2B
We are concerned that no where in the Bombplex/Programatic Environmental Impact Statement is executive order 13045 mentioned. This executive order deals with the protection of children, considering their special sensitivity to toxins. Every EIS should comply with this executive order.

10|14J
The neighborhoods surrounding SNL are largely low income, people of color neighborhoods. To accelerate bomb-making and further contaminate these communities is an environmental justice issue.

11|1F; 12|13A.1
Nuclear-bomb making violates the Non-proliferation Treaty, violates the rights of EJ communities and is no longer an effective deterent e.g. 9/11, if it ever was. Sincerely, Janet Greenwald, Co-ordinator, CARD, 202 Harvard SE, Alb NM 87106.

Grey, Meredith
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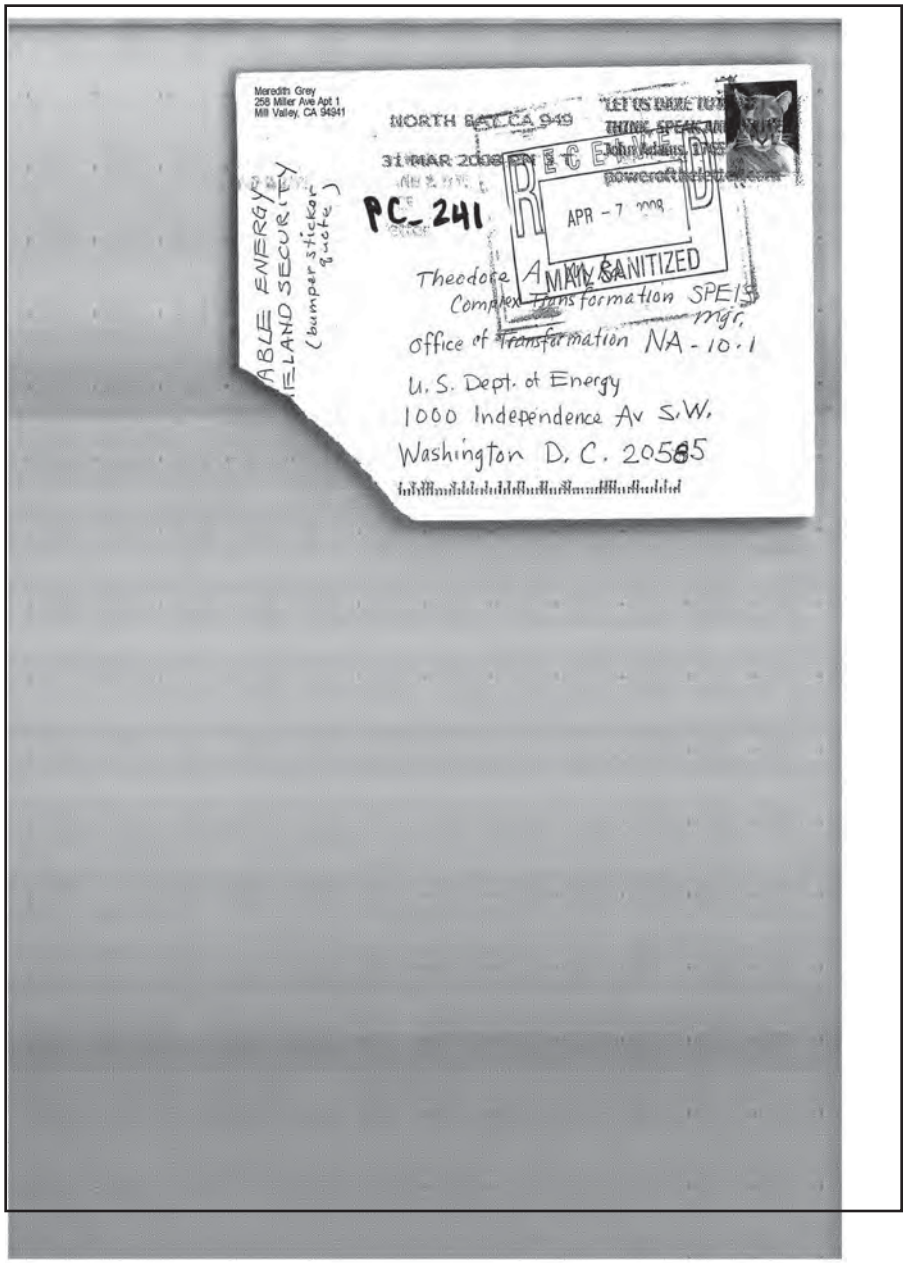

Grey, Meredith
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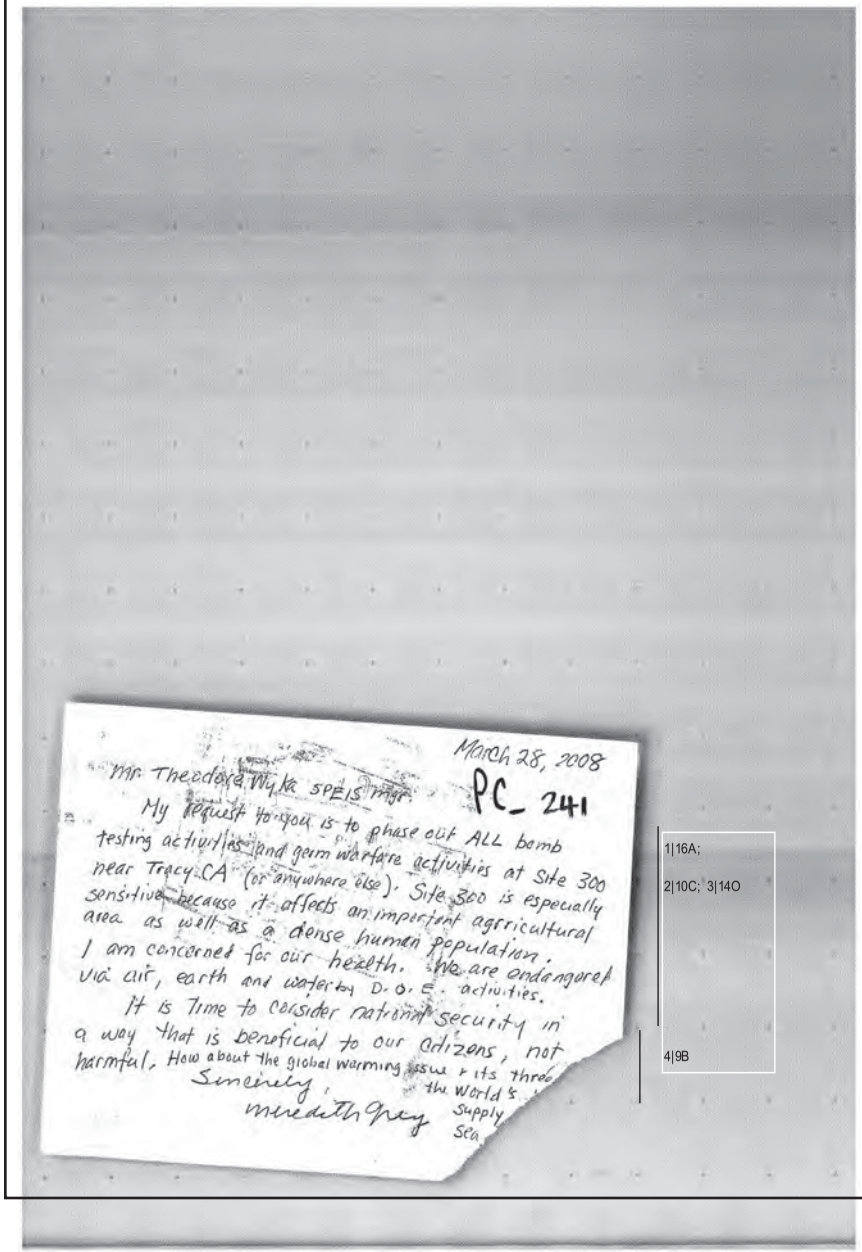

Grieb, Michael
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PC_218

UNOFFICIAL BALLOT
NATIONAL REFERENDUM ON
THE FUTURE OF NUCLEAR WEAPONS

INSTRUCTIONS TO VOTERS: USE BLACK OR BLUE PEN ONLY. To vote on Measures A and B, fill in the oval after the word "Yes" or "No." You may add your own comments below.

SUBMIT COMPLETED BALLOT TO DOE/NNSA BY APRIL 30, 2008
Mail: Mr. Theodore Wyka, Complex Transformation SPEIS Document Manager; Office of Transformation, NA-10.1; U.S. Department of Energy/NNSA; 1000 Independence Ave., SW, Washington, DC 20585
Fax: (703) 931-9222 • **E-mail:** ComplexTransformation@nnsa.doe.gov

MEASURES SUBMITTED TO THE VOTERS
NATIONAL

1|9A **A** Shall the United States proceed with a $150 billion plan to modernize its nuclear weapons research, development and manufacturing complex in order to replace its existing nuclear weapons and establish the capacity to build new types of nuclear weapons by the year 2030 ("Complex 2030")? YES ○ NO ●

2|1F **B** Shall the United States, in compliance with its obligation under the Nuclear Non-Proliferation Treaty, commit to the global elimination of nuclear weapons no later than 2030 by initiating negotiations leading to conclusion of a verifiable treaty, under strict and effective international control? YES ● NO ○

3|1J **COMMENTS:** THE BEST KIND OF LEADERSHIP IS TO SET A GOOD EXAMPLE. THE UNITED STATES CANNOT BE CREDIBLE WHEN IT ADVOCATES NON-PROLIFERATION FOR OTHER NATION STATES WHILE CONTINUING TO BUILD UP ITS OWN NUCLEAR WEAPONS.

NAME Michael A. Grieb
ADDRESS 4705 Strathmore Avenue, Post Office Box 6, Garrett Park, Maryland 20896

SIGNATURE Michael A. Grieb **DATE** 04/18/08

Groos, John
Page 1 of 1

PC_1393

Levens, Matthew

From: John Groos [jgroos@earthlink.net]
Sent: Tuesday, April 29, 2008 10:55 PM
To: Complex2030
Subject: Review rationale to justify funding for nuclear war head capacity i.e.CMRR

John Groos
3440 Edmund Blvd.
Minneapolis, MN 55406-2942

April 29, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I don't believe the Defense Dept. can produce justifiable evidence showing need for increased capacity to upgrade our nuclear arsenal . At this point in history I would hope any money allocated to the nuclear program would be spent to dismantle or otherwise render existing warheads inoperable, both here and abroad. There may be a role for nuclear energy but how can it be justified in the production of warheads? Hopefully the Congress will provide a more positive direction for the future of this program than many of us see today.

Sincerely,

John Groos
612-729-5176

Groos, John
Page 1 of 1

PC_1394

Levens, Matthew

From: John Groos [jgroos@earthlink.net]
Sent: Tuesday, April 15, 2008 9:10 PM
To: Complex2030
Subject: Nucclear Weapons programs in Congress

John Groos
3440 Edmund Blvd.
Minneapolis, MN 55406-2942

April 15, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A We already have a nuclear weapons crisis in the world without adding $1 to any new weapons or facilities under the guise of "national security".

It is unfortunate that the Dept. of Defense is even having this discussion! Defense dollars should already have been able to eliminate nuclear weaponry from WW 2 days, which would make us all a great deal safer by now.

No to use of Defense $ for additional weaponry or similar foolishness.

Sincerely,

John Groos
612-729-5176

Groshardt, Joanne
Page 1 of 1

PC_543

Buenaflor, Justin

From: joanne groshardt [bigheart335@yahoo.com]
Sent: Wednesday, February 20, 2008 8:59 PM
To: Complex2030
Subject: DON'T build a plant to produce plutonium pits

joanne groshardt
302 trailridge
richardson, TX 75081-4727

February 20, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

Sincerely,

joanne groshardt
972.644.4863

1

Grothus, Edward
Page 1 of 12

aolrich://5383771027/

Subj:	**Remarks for the National Nuclear Security Administrators, Los Alamos, 3/12-13/08**
Date:	Tuesday, March 11, 2008 9:56:06 PM
From:	EdGrothus
To:	EdGrothus

PC_998

Honorable Persons,

My name is Edward Bernard Grothus. On March 23rd I will have been in Los Alamos for 59 years. Most of the first twenty of those years I worked in Group GMX-4 at R-Site. There we did hydrodynamic, implosion studies in order to make "better" atomic bombs. We successfully reduced the size of bombs by thirty times while we increased the nuclear yield by thirty times to 475 kilotons of high explosives. One bomb today can destroy all of New York City. The physics package in a bomb today is the size of a bowling ball. You can put eight bombs on a single Trident submarine missile. There are twenty-four missiles on a Trident submarine and we have nineteen Trident submarines. With only the naval arm of the nuclear defense triad we can lay waste 3,648 places on earth the size of New York City. There is no cause, no reason, sufficient to destroy a single city anywhere on earth. What would be the gain in doing that?

1|9B — This hearing has been called to study the future of the Los Alamos National Laboratory (LANL). There is no future in promoting the nuclear business. To promote the building of "pits", to promote further plutonium studies and to do further simulated implosion studies, is both unnecessary and unwise. There is no science in this. Los Alamos scientists should be doing science. To have earned but one Nobel prize in over sixty years is an embarrassment and is positive evidence of how little science is done in the LANL.

What should scientists in the LANL do? Easy and abundant energy sources are what has made our country successful for so many. We have had an abundance of wood, coal, gas and petroleum. A war is now being waged for the control of oil supplies. Finding an energy source for a time when the supply of oil has been depleted is the crucial need.

The sun is the only safe nuclear power supply. The site is ideal at 93 million miles. The power output is essentially infinite. The power distribution is EVERYWHERE. At 93 million miles are no nuclear wastes with which to contend. LANL scientists should be assigned to do solar studies. A breathtaking development in the solar energy field would be even more noteworthy than was the successful detonation of the first nuclear bomb. In my judgment man will survive on this planet only if we learn to live with the output from our nuclear sun.

2|140; 3|7M.1 — I also want to tell you that the world is imperiled by the nuclear bombs already held here and elsewhere. Abolition of nuclear bombs is imperative. By accident or evil intent humanity can be destroyed. A nuclear Armageddon cannot be permitted to happen. Imagine a nuclear detonation which would make our power distribution system inoperative PERMANENTLY. Everything stops. Water and food distribution ceases. There is no communicating. Panic evolves into absolute chaos. After only a brief time "the living will envy the dead". Humanity dies in the race to oblivion. Everyone dies. What we take for granted today can never get cranked up again.

4|16A — Dear listeners, we cannot take the chance for the demise of humanity on this planet. Abolition is as crucial as is a solar breakthrough at LANL for the world. I remind you of a Latin funeral dirge.

Dies irae! Dies illa! Day of wrath! Day of mourning!

1 of 2 3/11/08 9:58 PM

LOS ALAMOS, NM (NM)

Grothus, Edward
Page 2 of 12

aolrich://5383771027/

Solvet saeclum in favilla: See fulfilled the prophets' warning.
Teste David cum Sibylla. Heav'n and earth in ashes burning.

You must take these words to heart and carry them to Washington, to the politicians, to the CEOs of the military/industrial complex and to the civilian leadership. Remind these entities that they die too. There must be a metamorphosis of the ugly worm of war into a beautiful butterfly of peace. There is security, not in military might, but only in peace.

Do unto others as you would have others do unto you.

Peace and love, Don Eduardo de Los Alamos Ed Grothus

Edward B. Grothus, 208 Andanada, Los Alamos, New Mexico 87544 USA
Phones: (505) 662-7438 home and (505) 662-5053 work
edgrothus@aol.com

****
It's Tax Time! Get tips, forms, and advice on AOL Money & Finance.
(http://money.aol.com/tax?NCID=aolprf00030000000001)

2 of 2 3/11/08 9:58 PM

Grothus, Edward
Page 3 of 12

Doomsday Stones

The Doomsday Stones are black granite, 52" cubes.

The obelisks will rest atop the Doomsday Stones. There will be a total of 12' of stainless tubing, 12" in diameter in holes between the various parts of the twin monuments, time capsules.

The message is as follows:

Welcome to Los Alamos, New Mexico, the United States of America, the CITY OF FIRE. Our fires are BRIGHTER THAN A THOUSAND SUNS. It was once believed that only God could destroy the world, but scientists working in Los Alamos first harnessed the power of the atom. The power released through fission and fusion gives many men the ability to commence the destruction of all life on Earth. The first atomic bomb was designed and built here. It was at Trinity Site (33 degrees, 44 minutes, 38 seconds North latitude and 106 degrees, 28 minutes, 29 seconds West longitude) on July 16, 1945, at 5:29:45 AM that the first nuclear bomb was detonated. Trinity Site is 2 degrees, 8 minutes, 29 seconds and 153.2 miles southwest of Los Alamos. Two cities in Japan, Hiroshima and Nagasaki were destroyed by single atomic bombs on August 6th and 9th, 1945 bringing an end to World War II. Now 62 years later, Los Alamos, obedient to the almighty Pentagon, carries on its awesome, assigned mission to assure continuing nuclear capability. Nuclear bombs cannot be used rationally and dreams for safe and useful nuclear power may never be realized. It is only in Los Alamos that the potentials for unimagined, fantastic good and demonstrated, horrendous evil are proximate. There is no assurance that man will pass safely through the Nuclear Age to a benign Solar-Hydrogen Age.

4|16A (cont.)

The above is to be inscribed in 15 language. Arabic, Chinese Hungarian English, French, German, Greek, Hebrew, Hindi, Italian, Japanese, Latin, Portuguese, Russian, Spanish.

I hope to find a hieroglypics translator. Engraved on one obelisk as below.

Mr. Edward B. Grothus
P.O. Box 795
Los Alamos, NM 87544

$E = mc^2$
ALBERT EINSTEIN
1879 -- 1955

The above on all eight faces of the obelisks.

SEMPER FABRICATE NUMQUAM CONSUMITE

The Latin:
ALWAYS BUILD NEVER DESTROY

NO ONE IS SECURE UNLESS EVERYONE IS SECURE

ONE BOMB IS TOO MANY

Over

Copy for: Art in Public Places Board 4/11/07

Mounted atop the obelisks are black granite spheres one meter in diameter. The spheres will have delineations in the

Grothus, Edward
Page 4 of 12

Opinion

Los Alamos Monit

Thursday, July 5, 2007

Deterrence is not a solution

Dear Editor,

The $1.3 trillion war is so stupid and so unrewarding in every respect that the civilian leadership, the obedient warriors in the Pentagon, the condescending politicians, the greedy, money-grubbing CEOs of the industrial complex and the numerous churches might learn the lesson that the war through fear and deterrence is not a solution for world stability. If these five entities can be made to understand the folly of the war, maybe, just maybe, there will be a major transition in the affairs of men.

5|13A

No one is secure unless everyone is secure. Immigrants seek security. Terrorists respond to our terrorism. Irrationally Homeland Security assures we should safely live in fear henceforth. A war virus has attacked our once-admired political system. Caesar's legions have failed again.

Iran could have been won with the delivery of power plants, automobiles, trucks, refrigerators, washing machines and other useful things. Corporations would have been rewarded for their manufacture of good things then to be given freely away. The consequences of such a policy would have begotten no deaths and destructions.

It would have been so very cheap compared to the costs of what is presently transpiring. The natives of Iraq would be loving us instead of hating us. This wise policy is of the Golden Rule: Do good to that guy who might hurt you. The Golden Rule has never been practiced but that wisdom has been known for millennia. For humanity's survival, a transition is essential.

Materials designed for killing have been manufactured and given freely away to no productive purpose. The stupid war, instigated dishonestly, illegally, preemptively and aggressively by an evil man and his coterie of criminals, and approved by conniving politicians and hypocritical clergies, is beyond redemption. Everyone and everything is at risk. A major transition – a metamorphosis from the ugly worm of war into a beautiful butterfly of peace – is imperative.

Meanwhile, we hurtle toward a nuclear Armageddon. The nuclear genie cannot be returned into the bottle. The genie's consequences, however, could be controlled if nuclear weapons were abolished. Humanity should not be tortured by a nuclear Armageddon, a disaster too horrible to contemplate. Humanity should survive at least until some smart physicist solves the unified field problem and turns our star into a supernova. We could all go together then without hardship or suffering.

2|14O (cont.)

If the lesson this war teaches is understood by the powerful of the world and a transition occurs, the war may ultimately prove to be beneficial. It may be the war to end all wars. Pax vobiscum.

Edward B. Grothus
Los Alamos

Making pits is not science LA Monitor

Dear Editor,

There is no science in making pits. The world does not need pits. Stop the nuclear madness.

7/12/07
Edward B. Grothus
Los Alamos

Grothus, Edward
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aolrich://60507103Q/

Subj: the conscience of los alamos
Date: Wednesday, June 6, 2007 2:32:09 PM
From: BKoehler@Tribune.com
To: BKoehler@Tribune.com

I hope to have pictures from the Black Hole posted on my website (commonwonders.com) in a day or two!

ROBERT C. KOEHLER
For release 6/7/07

THE CONSCIENCE OF LOS ALAMOS

By Robert C. Koehler
Tribune Media Services

I looked up when Ed pointed to the butte that loomed suddenly in the bend of the mountain road and said, "See. That's where they should go, right there."

And for an instant I imagined them towering against the big sky over Los Alamos, N.M.: two white granite "peace obelisks" 30 feet high, signaling to everyone entering or leaving the Atomic City, birthplace of The Bomb and home for 60-plus years of the national weapons lab that bears its name, that a counter-consciousness has staked its claim in the heart of the nuclear weapons industry. Their inscription begins:

"Welcome to Los Alamos, New Mexico, the United States of America, the city of fire. Our fires are brighter than a thousand suns. It was once believed that only God could destroy the world, but scientists working in Los Alamos first harnessed the power of the atom. The power released through fission and fusion gives many men the ability to commence the destruction of all life on earth. . ."

6|2O

This is the vision and nightmare of Ed Grothus, for 20 years a machinist in that very weapons lab, and for almost twice that long since then a much different sort of presence in town — peace activist, clown prince, self-proclaimed cardinal of the First Church of High Technology and, as proprietor of the Black Hole (dubbed "the most unusual place in the universe" by former astronaut Don Pettit), a dealer in old bomb casings and dented file cabinets and other, occasionally mind-bogglingly exotic discarded equipment from the lab, or what he calls "nuclear waste."

A lot of people call their visit to the Black Hole a pilgrimage, and there is indeed something awe-inspiring, if not hallowed, about the place — an acre or so of junk and history, much of it crammed into the shell of a former Piggly-Wiggly grocery store, all of it animated by Ed himself. The 84-year-old man, weathered and craggy, with a shock of white hair, gives tours to dozens of people each day; each tour is a combination history lesson and peace lecture, and both are personal.

For instance, at the requisite stop at the high-speed Marley camera, once exquisitely state-of-the-art, with a mirror that revolves 15,000 times a second, but which is now obsolete — lab junk, out the back door with it — Ed will tell you with a fierce mixture of pride, bitterness and gallows humor that when he worked at the lab he wielded this baby.

"It takes a picture of the exact moment of the blast," he said. "I worked in the weapons group to develop 'better' atomic bombs." As he talks he hugs the camera — it was his, and it still is. And he shakes his head at the waste: a $2 billion annual budget at the lab allows scientists to discard what they're done with after a year or maybe after a single experiment.

Ed buys the stuff at auctions and sells it to people with a wide variety of interests. A lot of artists frequent the Black Hole and poke around for inspiration. Ed also supplies movie props, beginning with "Silkwood" in 1983. It's nuts, of course, but in such an American way — that part of the residue of weapons production winds up in anti-nuke and other movies. But Ed doesn't linger too long on the

Grothus, Edward
Page 6 of 12

aolrich://60507103

oddness or irony.

As a machinist at R Site, "We did the hydrodynamics of implosions," he told me. "We reduced the size of a bomb by 30 times while we increased the yield by 30 times."

It was during the Vietnam War that his own conscience imploded. While watching war coverage on TV, he lost his protective illusion that this was honorable work, ultimately bringing good to the world. He started getting involved in anti-war activities. Before too long, the schism between work and conscience became untenable and, in late 1969, he left the lab. But he had no interest in leaving Los Alamos.

6|2O (cont.)

Ed prospered as a businessman, selling turquoise and silver jewelry and dealing "nuclear waste" on the side. Now he just does the latter, but his real occupation is staring down the true believers of the nuclear establishment.

"Everyone from Einstein on down failed," he said. Failed, that is, to curb that establishment or even spread the alarm sufficiently, so that most of the human race grasped the danger they were in. "It's terrible to have a conceit like mine," he conceded, "to think that everything depends on me." But he added, "Failure is not an option for us."

And this brings me back to those obelisks, which are real. They were quarried and carved in China — a project of considerable undertaking that Ed conceived in a flash some years ago, shortly after he had acquired, at auction, two three-ton blocks of black granite from the lab, which he dubbed the "Doomsday Stones." Inspired by a book he was reading on ancient Egypt, he decided to turn them into modern-day Rosetta Stones, which would bear an inscription in 15 languages, including, if he ever finds a translator, hieroglyphics. The obelisks, which he shipped back from China last fall and are currently in storage in a trailer on the lot of the Black Hole, would be mounted atop the Doomsday Stones . . . maybe on that butte overlooking Los Alamos.

And maybe not, of course. And maybe no matter what happens to them, it will be too late for humanity. But the proprietor of the Black Hole won't stop trying to sound his message until it is.

Robert Koehler, an award-winning, Chicago-based journalist, is an editor at Tribune Media Services and nationally syndicated writer. You can respond to this column at bkoehler@tribune.com or visit his Web site at commonwonders.com.

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Grothus, Edward
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Sunday, July 29, 2007 Los Alamos Monitor • A3

"Why, of course, the people don't want war. Why would some poor slob on a farm want to risk his life in a war when the best he can get out of it is to come back to his farm in one piece? Naturally, the common people don't want war, neither in Russia nor in England, nor in America, nor in Germany. That is understood. But, after all, it is the leaders of the country who determine the policy and it is always a simple matter to drag the people along, whether it is a democracy or a fascist dictatorship or a parliament or a Communist dictatorship. The people can always be brought to the bidding of the leaders. That is easy. All you have to do is tell them that they are being attacked and denounce the pacifists for lack of patriotism and for exposing the country to danger. It works the same way in any country." – Reichsmarschall Hermann Goring, Nuremberg, 1945.

6|2O (cont.)

This "ad" is to appear in the MONITOR again on August 5th and August 8th, 2007.

Mr. Edward B. Grothus
PO Box 795
Los Alamos, NM 87544
WWW.HRW.ORG

Grothus, Edward
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solrich/4801?1?630/

Subj: Re: Data on the Monuments
Date: Tuesday, December 18, 2007 7:46:50 PM
From: MGrothus
To: EdGrothus, HGrothus

The Doomsday Stones – Facts, Figures and Trivia – Mike Grothus 12/18/2007

The table below calculates the weight of each of the components of this project and includes the formulae that were used in the calculations. The density of Granite is 168 lbs/cubic foot in these calculations.

Item	Size	Lbs	Minus	Total each	Tons	Tons for 2	Lbs for 2	Vol
Sphere	1 meter	3109	132	2977	1.49	2.98	5954	(4/3) pi r^3
Cube	52"	13670	264	13406	6.70	13.41	26813	l^3
Base	71"x23"	11272	253	11019	5.51	11.02	22039	l*w*h
Obelisk	4' to 2' x 10m	51457	0	51457	25.73	51.46		(1/3)*h*(b^2+ab+a^2)
Total		79508	649	78859	39.43	78.86	157718	

6|2O (cont.)

The obelisk is 10 meters (32.8 feet) tall. The overall height from the ground level to the top of the sphere is 39.2 feet. A buddy put the obelisk into a mechanical CAD program, and calculated that the center of gravity for the obelisk is 156.5" up from the base (and confirmed my weight estimate above at 51,617 lbs. which did not subtract the weight of the 14" deep hole in the obelisk base for the stainless pins that will keep this together. Wow – 39.2 feet tall and 39.4 tons each – that is one ton per foot...

There are stainless steel closed ended cylinders that are used to "pin" the parts together. The long ones go through the base and into the cube. The short ones go between the cube and the obelisk. They have 1 fixed end and 1 removable cap end which serves as "time capsules" for the monuments.

Stainless	Vol (cu in)	0.3 lbs/cu in
Caps (2)	192	57
Long	1624	487
Short	795	238
Total long	1816	545
Total short	986	296
Total all	2802	841

Since there is some concern about the foundations upon which these monuments will be placed, I also calculated some loadings (psi and psf) at ground level (below all of the monument) as well as between the base and the cube and between the cube and the obelisk. Those loadings are as follows:

psi	psf	
15.6	2252.7	Ground
25.1	3612.6	Below DS
23.6	3402.1	Above DS

Grothus, Edward
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Grothus, Edward
Page 10 of 12

Subj: Embridered Patch Explaination
Date: Wednesday, September 4, 2002 11:33:20 AM

The Nature Conservancy
Edward B. Grothus
PO Box 795
Los Alamos, NM 87544

6|2O (cont.)

The patch enclosed was designed by Ed Grothus for the University of California, Los Alamos. All of the employees of the Los Alamos National Laboratory (LANL) are employees of the University of California. They can send their children to University of California schools as if they were actually residents of the State of California.

W88 is a crown jewel of the nation's nuclear stockpile. Yield: 475 kilotons of TNT.

MIRV These letters mean: Multiple, Independently targeted, Re-entry, Vehicles. These letters are superimposed on re-entry vehicle shapes. A single Trident submarine missile carries up to nine of these weapons of mass destruction. A Trident submarine can launch 24 missiles and we have at the present time 18 Trident submarines. Hence we can destroy 8 X 24 X18 = 3,456 places on earth the size of New york City. This is madness. ?Es verdad?

1943 is the start of the Nuclear Age here in Los Alamos.

2013 is the end of the Nuclear Age. Washington, D.C. is destroyed in the Fall of that year. This starts the ultimate Nuclear Holocaust, when weapons of mass destruction are launched from anywhere to everywhere and the world as we know it is largely destroyed. Incidentally, it has been pointed out to me recently that the winter solstice of 2012 is a transition date in the Mayan calendar. I did not know this at the time I chose 2013.

The symbol for radiation danger is in the center of the U of C, Los Alamos, Great Seal.

IN BOMBS WE TRUST This is a Los Alamos philosophy. Ours is not to reason, "Why?"

LET THERE BE NUCLEAR LIGHT This can be read in three ways: Light from and exploding weapon of mass destruction, Light from a nuclear power plant, or Light from the Sun.

The University of California Great Seal shows an open book with the words: LET THERE BE LIGHT

This was originally designed as a Great Seal for the University of California-Los Alamos. It was designed in late 1999. The 5" diameter badge is now available for $5.00 each from: The Black Hole, 4015 Arkansas, Los Alamos, New Mexico 87544. Add $1.00 for postage.

Ed Grothus September 4, 2002

December 27, 2005

I have now fathomed just how the Nuclear Holocaust comes about. In 2013 an American, like at Oklahoma City, destroys Washington, DC with an American weapon of mass destruction. After this event there is a namouthe exchange of WoMD occurs and life on our planet is essentially extinguished. I am doing everything I can to prevent this disasterous sequence of events from happening.

Cardinal Don Eduardo de Los Alamos

9/4/02 America Online : EdGrothus Page 1

Grothus, Edward
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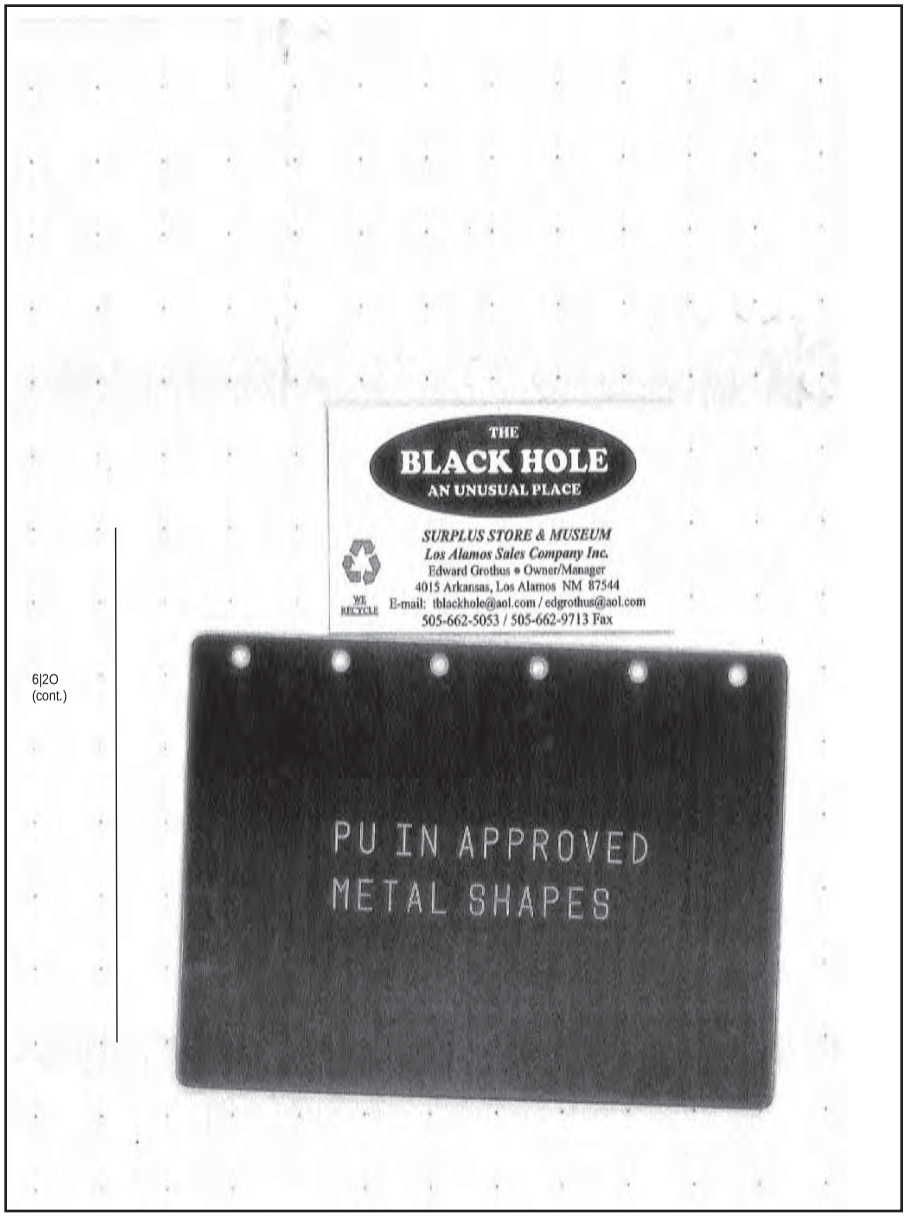

6|2O
(cont.)

Grothus, Edward
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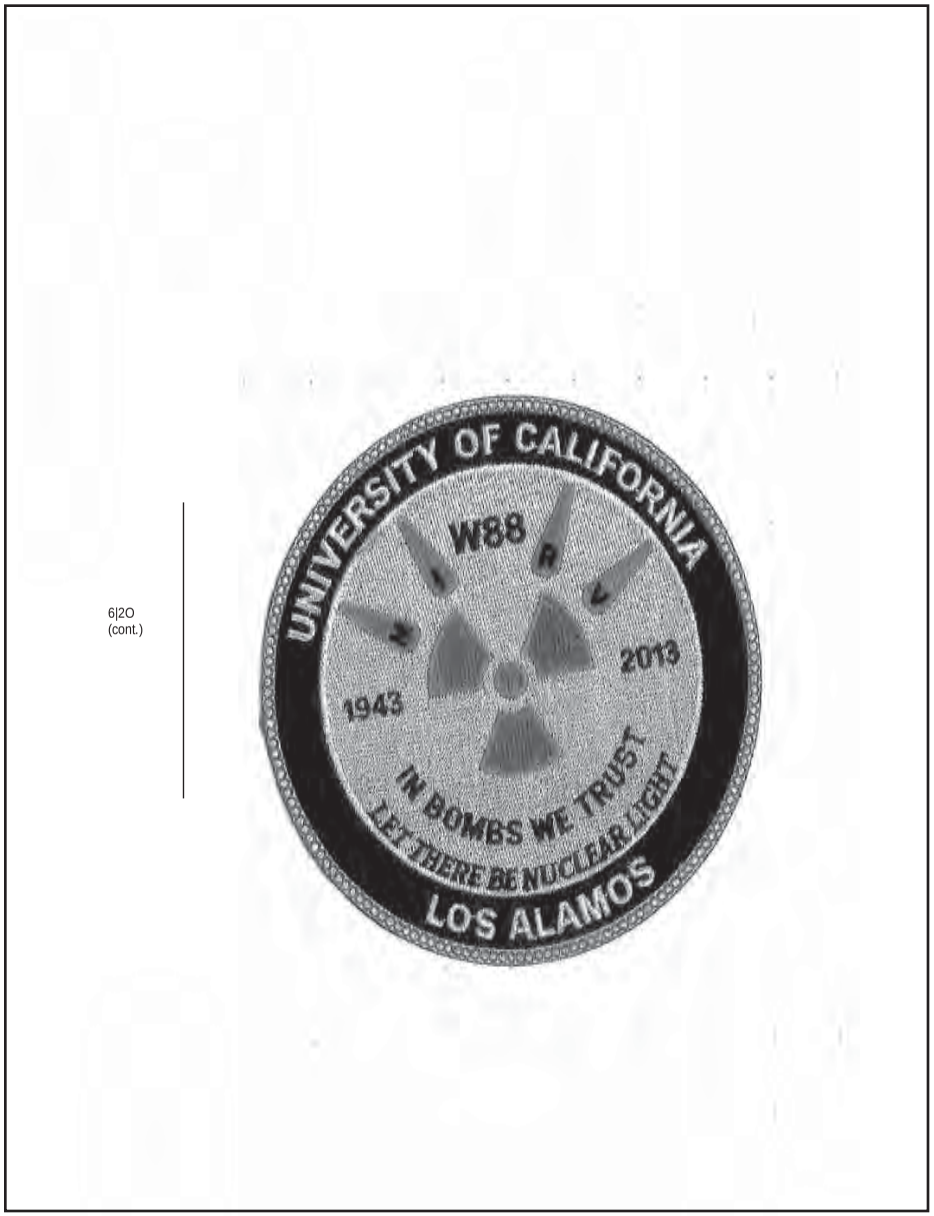

6|2O
(cont.)

Grula, John
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MAR-21 2008 11:46 FROM:CARNEGIE DBS 6267959138 TO:7039319222 P.1/1

23 March 2008

PC_200

Mr. Theodore A. Wyka, Complex Transformation SPEIS
Document Manager
Office of Transformation, NA-10.1
Dept. of Energy / NNSA
1000 Independence Ave., SW
Washington, D.C. 20585

Dear Mr. Wyka,

"Complex Transformation" is a fundamentally flawed, misguided plan that overemphasizes recreating the capacity to research, develop, and manufacture new nuclear weapons. The United States still maintains thousands of nuclear weapons; it does not need to design new types or produce new warheads. 1|3A

In addition, the U.S. would be more secure if nuclear weapons are eliminated worldwide. The U.S. should re-affirm our commitment under the terms of the Nuclear Non-Proliferation Treaty, which we signed in 1968 and ratified in 1969, to a world free of nuclear weapons. Furthermore, we should publicly pursue this goal, which will help the U.S. prevail other nations from developing nuclear weapons. Complex Transformation plans for producing new plutonium pits undermine those critical national security needs. In addition, the production of more plutonium will create a serious environmental and health hazard which will last many thousands of years and be extremely difficult and expensive to safely eliminate. 2|13A.1 3|1F 4|1J 5|14O

The D.O.E. needs to abandon its Cold War mindset. Our nuclear arsenal is already highly reliable after the 1054 nuclear tests we conducted from 1945 to 1992. Rather than trying to build new nuclear weapons, our focus should be on shrinking the still-oversized nuclear weapons complex and on maintaining the safety and security of existing weapons as the size of our nuclear stockpile is reduced. Thank you for your attention to this matter. 1|3A (cont.) 4|1J (cont)

John Grula, Ph.D.
2142 E. Sierra St.
Pasadena, CA 91104

Gumbleton, Thomas
Page 1 of 1

PC_39

Archdiocese of Detroit

Bishop Thomas J. Gumbleton

February 15, 2008

Theodore Wyka
Complex Transformation SPEIS Document Mgr.
U.S. Department of Energy
1000 Independence Ave. S.W.
Washington D.C. 20585

Re: ``Draft Complex Transformation SPEIS Comments."

Thank you for your letter of December 21, 2007 inviting us, as "interested party", to submit comments on "Complex Transformation's Supplemental Programmatic Environmental Impact Statement" (SPEIS, DOE/EIS-0236-S4).

The process of building any nuclear weapon is a danger to our environment. Instead of just looking at the threat to the local environment during the process of building nuclear weapons I implore you to also look at the obvious potential ultimate destruction of most of the life on earth if nuclear weapons are ever used. 1|14O 2|11E

As a Bishop in the Archdiocese of Detroit, since July 2002, I have been encouraging people to make a stand against the continued development of nuclear weapons, especially at the Y-12 plant in Oak Ridge, Tennessee. For the U.S. to continue to build nuclear weapons especially to plan to build "usable" nuclear weapons, I think, is not only illegal but also I feel is unconscionable and immoral. 3|16A 4|1F

In a talk I gave titled "Living Nonviolence in Today's Reality," I concluded with some quotes from the Indian novelist Arundhati Roy. "The nuclear bomb is the most anti-democratic, anti-national, anti-human, outright evil thing that human kind has ever made. If you are religious, believe in God, then remember, this is our challenge to God. We, God's creatures, have the power to destroy everything you have created. If you're not religious, then look at it this way: This world of ours is 4,600 million years old. It could end in an afternoon." 5|20.0

The choice is yours. I pray you choose wisely for the future of life on our planet, and not issue approval for the building of "Complex Transformation."

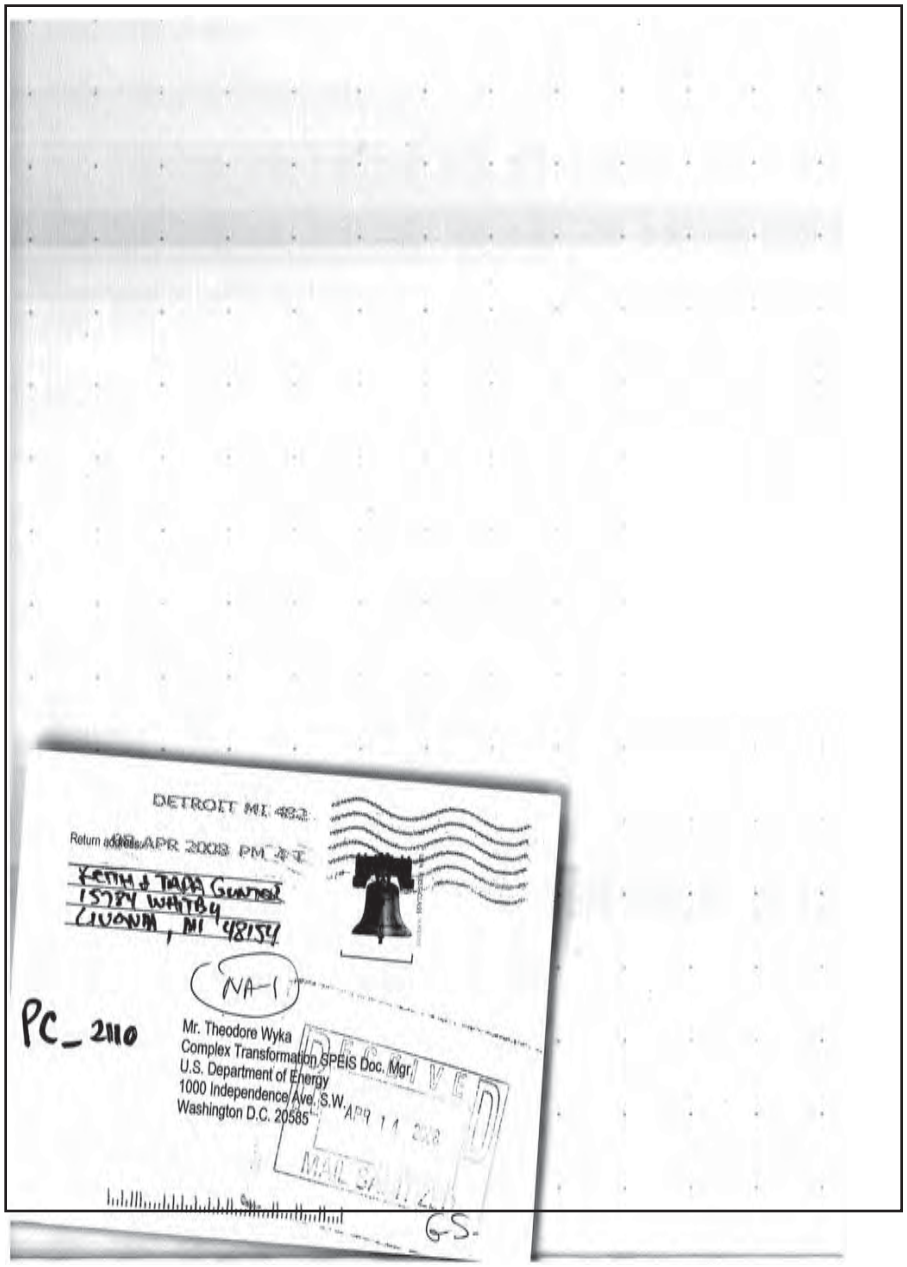
Sincerely,

Thomas J. Gumbleton

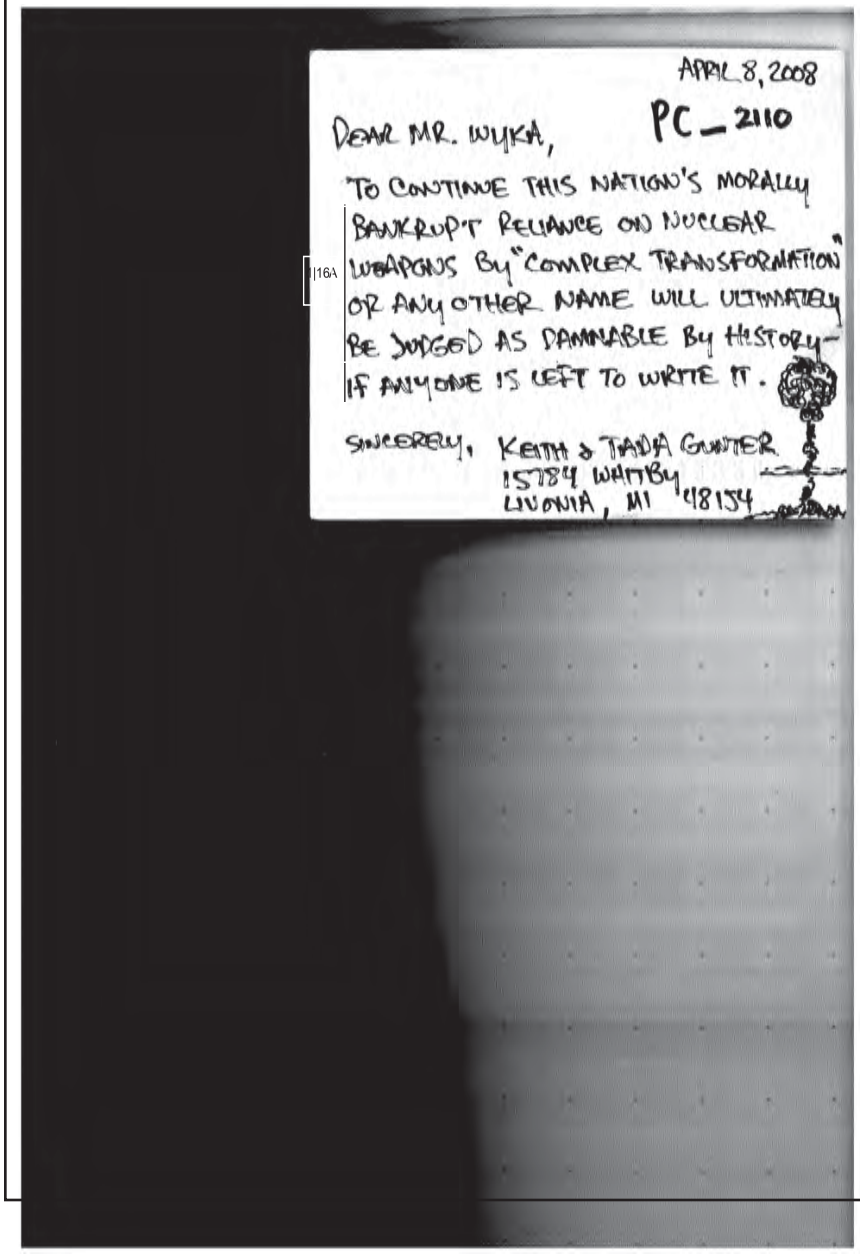
Bishop Thomas Gumbleton
Archdiocese of Detroit

4800 Grand River Avenue • Detroit, Michigan 48208 • Tel: 313-898-3328 • Fax: 313-897-2980

Gunter, Keith
Page 1 of 2



Gunter, Keith
Page 2 of 2


APRIL 8, 2008

DEAR MR. WYKA, PC_2110

TO CONTINUE THIS NATION'S MORALLY BANKRUPT RELIANCE ON NUCLEAR WEAPONS BY "COMPLEX TRANSFORMATION" OR ANY OTHER NAME WILL ULTIMATELY BE JUDGED AS DAMNABLE BY HISTORY— IF ANYONE IS LEFT TO WRITE IT. I16A

SINCERELY, KEITH & TADA GUNTER
15784 WHITBY
LIVONIA, MI 48154

Gutierrez, Rebecca
Page 1 of 2

PC_1065

March 27, 2008

National Nuclear Security Administration (NNSA)
Washington, DC

Subject: NNSA Complex Transformation

To Whom It May Concern:

On Wednesday March 12, 2008 I attended a briefing on the "Complex Transformation" at the Santa Clara Pueblo Senior Citizen Center. The NNSA group of presenters was interested in concerns and discussions regarding environmental and cultural impacts and their consequences. There is a direct "cause and effect" to us living in Santa Clara Pueblo as well as the entire northern New Mexico Indian and Hispanic communities.

As a member of Santa Clara Pueblo, I know we have a unique, beautiful, and prayerful culture that exists no where else in the world. Our ancestors worked very hard and sacrificed for our pueblo so that we would have a place to call home. We have to continue to respect, honor, and keep our aboriginal homeland environmentally and culturally safe. It is our responsibility and we will be held accountable by our ancestors as well as future generations to come. If we let it go and don't protect it, we will not be a tribe. We have a beautiful culture that has sustained all of us over thousands of years individually and as a tribe. We need to continue living together in order to continue our traditions, our dances, our songs, our language, and our way of life.

It is my firm belief that we cannot allow Los Alamos to continue with their new venture. They have not yet cleaned up the nuclear waste that currently exists. In the 65 years that the Los Alamos National Laboratory has existed we have compromised and compromised. Compromising is no longer acceptable! We need to say "NO" we cannot allow them to continue to contaminate our homeland. 1|7F

We already have health care issues for our native people. The government continues to cutback funding for health care for Native Americans, even though we have been promised excellent health care. 2|1K

It is my worst nightmare that in 20 or 25 years or sooner our air, water, and our land will be contaminated due to a government mistake as what happened with the Cerro Grande Fire of 2001. The Pueblo of Santa Clara economy was devastated and our tribal lands and the wildlife that we depend on was destroyed. When and if the government makes another mistake and they 3|14O

Albuquerque, NM

Gutierrez, Rebecca
Page 2 of 2

condemn our tribal land, the government will tell us that we have to move away from our aboriginal homeland. Will the government be responsible for our displacement, our health, and our medical needs? What will happen to those who choose to stay to protect our kivas and our sacred sites that are here? Where will our children and future generations live? Where will they go? It will be the "Extinction" of our Santa Clara Pueblo Tribe! It will be a horrible, painful, and sad way of life. It will be a cultural devastation to our pueblo way of life. 3|14O (cont)

We need to protect what our ancestors have left for us. They sacrificed so that we could have what we need to sustain our way of life. We need to respect, honor, and protect our homeland which is really "Our Life." What city or state will accept all 3,000 of us so that we can live together to continue our songs, our dances, our traditions, our language and our culture? Where will we go? Will we be another Rocky Flats? Will it be another cover up by the US Government and its corporate defense contractors committing another Rocky Flats environmental crime? Look at Rocky Flats, it is shut down and in a clean up mode which may continue for over 100 years. In the event of a nuclear facility accident, how long will it take for Los Alamos to be cleaned up? 4|14H

It is easy and common for non-native people that work in Los Alamos to move across the country, move next door to strangers and start a new life. We cannot do that.

This is a changing moment in our lives. What do we want for ourselves, our husbands, our wives, our children, our grandchildren, our great grandchildren, and future generations to come? What do we exactly want for ourselves and for them? We are responsible and accountable for what we leave for them. It is worth the fight to ensure we leave them a safe and secure future. Please stop the NNSA Complex Transformation in Los Alamos. I speak on behalf of the surrounding pueblos and communities which will also be affected. These are my concerns for my people here at Santa Clara Pueblo. As a sovereign nation we cannot allow ourselves to become extinct over another US Government "Mistake!!" 5|16A

Respectfully,

P.S. I request a 120 day extension! 6|2E

Rebecca Gutierrez

Rebecca Gutierrez
Santa Clara Pueblo

Hablas, Anne
Page 1 of 1

PC_89

February 28, 2008

Theodore Wyka
Complex Transformation SPEIS Document Manager
US Department of Energy
1000 Independence Ave. SW
Washington DC 20585

Dear Mr Wyka:

1|16A I am writing once again to express my opposition to the Complex Transformation proposal to build more nuclear weapons. The Draft Programmatic Environmental Impact Statement does not address any of my concerns.

2|1F
3|1J In the scoping hearings the public spoke clearly: "We continue to insist on an alternative that meets our Nuclear Nonproliferation Treaty obligations." In fact there has been an insistent call from the citizens of this country that the U.S. take a leadership role in disarming its nuclear stockpile and moving towards abolition.

4|9B In this time of economic hardship for the country, with continuing concerns over the lack of health care coverage and inadequate funding in education, housing and more, it seems unconscionable that we are planning to spend billions of dollars on a new bomb plant and on new nuclear weapons.

1|16A (cont)
4|9B (cont)
2|1F (cont) I join with others in saying: "No new bomb plants. No new bombs, no old bombs, no Stockpile Life Extension bombs! Spend the billions on building a stronger society, where everyone has food, shelter, health care, and the prospect of a living wage job. Lead the world to true security and keep the promise we made in the Nonproliferation Treaty in 1970 to pursue complete disarmament.

Sincerely,

Anne

Sister Anne Hablas
1101 32nd Avenue South
Fargo ND 38103

Hadder, John
Page 1 of 6

PC_432

HOME
Healing Ourselves & Mother Earth
PO Box 420 Tecopa CA 92389 760.852.4151 Fax 775-587-0766
PO Box 6595 Reno NV 89513 775.624.6975 www.h-o-m-e.org

Attention
Theodore A. Wyka
Complex Transformation
SEIS Document Manager
U S Department of Energy
1000 Independence Ave SW
Washington, DC 20585.

April 30, 2008

Re: comments on the *Draft Supplemental Programmatic Environmental Impact Statement* (Complex Transformation SPEIS, DOE/EIS-0236-S4)

These comments are prepared by HOME with help from the Western Shoshone Defense Project regarding Western Shoshone Treaty and Human rights comments.

Need for Agency Action

The Draft Supplemental Programmatic Environmental Impact Statement (DSPEIS) appears to be driven by three main objectives:

1|3A1

> *In accordance with the national security policies developed after 1996, this SPEIS focuses on the present need for a more responsive NNSA Complex that will:*
> - *Maintain core competencies in nuclear weapons;*
> - *Maintain a safe and reliable nuclear weapons stockpile; and*
> - *Create a responsive nuclear weapons infrastructure that is cost-effective, has adequate capacity to meet reasonably foreseeable national security requirements, and consolidate Category I/II special nuclear materials (SNM) at fewer sites and locations within sites to reduce the risk and safeguards costs.*
>
> *– DSPEIS, pg. 2-13*

Bullet point two is satisfied by the existing infrastructure, as nowhere in this document or preceding public documents that HOME is aware of does the National Nuclear Security Agency (NNSA) admit to the contrary, that our Nuclear Complex does not "maintain a safe and reliable nuclear weapons stockpile."

Bullet point one above is not clearly defined the text that follows in the DSPEIS. The language is consistently intermingled with the objective stated in bullet point three. However, it appears as though minor modifications to the existing nuclear complex and eliminating redundant facilities will accomplish the objective in bullet point one.

1

Hadder, John
Page 2 of 6

The objectives stated in bullet point three are in our view the linchpin of this EIS, which is derived from the Nuclear Posture Review, that necessitates the proposed action. Throughout the DSPEIS "responsive infrastructure" and "cost-effective" are used together implying that they are closely linked. HOME sees that some of the consolidation aspects of the proposed action may improve the cost efficiency of the complex, but Complex Transformation does not appear to HOME to be mostly about cost-effectiveness as about the development of new nuclear weapons.

2|1C
1|3A1 (cont.)

The DSPEIS states on page 2-3 that:

> *In 2001, another NPR was conducted; it concluded that a strategic posture that relies solely on offensive nuclear forces is inappropriate for deterring potential future adversaries. A classified summary of the 2001 NPR was submitted to Congress in February 2002.*

This indicates that current designs will not be effective in the future and that we need a new kinds of nuclear weapons. The DSPEIS goes on to state:

> *A "new triad" was defined consisting of nuclear and non-nuclear strike capabilities, defenses, and a robust, responsive nuclear weapons infrastructure supported by enhanced intelligence and adaptive planning capabilities. Prior to the 2001 NPR, the term "triad" generally referred to strategic land, sea, and air nuclear forces.*
>
> *– pp 2-3 – 2-4*

Here we see the phrase "responsive nuclear weapons infrastructure" embedded in the not directly stated central purpose to develop new nuclear weapons. Since it is politically unpopular to state that we need to develop new nuclear weapons the DSPEIS uses the circuitous language of "responsive" and "adaptive" along with the usual buzz words "safety and reliability." Responsive is defined on page 2-10 as "the ability to successfully meet national security requirements on schedule and react to new developments." What does it mean by "react to new development?" The DSPEIS continues on page 2-10 to say, "Lack of responsiveness has been evidenced by difficulties in executing weapon production schedules in support of maintenance, retrofit, and Life Extension Programs, and by the lack of a sufficient pit production capability." While these examples are arguably evidence of lack of responsiveness they do not address what is meant by "react to new development." What is a new development; North Korea obtaining nuclear weapons? Is the public to assume that meeting existing production schedules will serve as a threat to a country like North Korea and thus force them to disarm their nuclear weapons?

3|1L

Responsive is also put in some vague context further down on page 2-10:

> *The purpose of a reliable and responsive infrastructure is to deter adversaries from trying to seek advantage – an attempt to seek advantage would be detected and negated by a quick response.*

How would adversaries get an advantage on the United States? Since, there is an important emphasis within the proposed action to downsize our nuclear stockpile the "advantage" of concern here cannot be do to stockpile size. It must be capability; that US nuclear weapons can do something that the other country's nuclear weapons can't. Thus, we need to be capable of developing any new weapon quickly to demonstrate superiority. But, the "new triad" as mentioned above also includes "nuclear … strike capabilities," so the DSPEIS is suggesting use as well as show of ability to develop new nuclear weapons.

4|7K

Indeed, both of the above actions, new nuclear weapons development and use, are very unpopular politically, which would seem to explain the indirect language used in this document. HOME is very concerned that the NNSA is trying to hide the real intension of this proposed action behind words like cost-effective and the usual safety and reliability verbiage. The reason is clear since the Nuclear Posture of the Bush Administration is at odds with the public perspective and desire.

4|2K27
2|1C (cont)

2

Hadder, John
Page 3 of 6

Given that the actual purpose is the development and ability to use new nuclear weapon designs there will eventually be a need to test these designs. No military commander would use an untested weapon. Existing virtual testing and related experiments are adequate for the weapons we have now, but as stated on page 2-19 new nuclear weapons will require testing:

5|1D

> *…the development of new weapon designs requires integrated nuclear testing such as occurs in nuclear explosive tests. Short of nuclear testing, no single stockpile stewardship activity, nor any combination of activities, could confirm that a new-design weapon would work. In fact, a key effect of a "zero-yield" CTBT would be to prevent the confident development of new-design weapons.*

Again, the suggestion of resumed nuclear testing is very politically unpopular and would receive strong opposition in Congress, which is evidenced by public outcry to the Divine Strake experiment originally slated for the Nevada Test Site. Divine Strake was not even a nuclear weapon, but the connection to nuclear weapons and potential for radioactive dust lofted into the air as a result of the explosion was sufficient to move the public into overwhelming opposition. NNSA, then tactically "cancelled" Divine Strake and proceeded to perform the experiment at White Sands New Mexico under a different name.

The DSPEIS does not take nuclear weapons testing off the table, but does state in numerous locations the desire to avoid testing, and suggests that the proposed action will better allow the avoidance of testing. This can only be true of no new nuclear weapons are developed.

5|1D (cont)

Since the real purpose of this action is not stated upfront the DSPEIS still does not address HOME's philosophical underpinning concern that we discussed in our scoping comments, which are:

> *Complex 2030 documentation cites the Nuclear Posture Review as a principle underpinning for the need for this action. The SEIS needs to reevaluate this underpinning. Since, the release of the NPR, it has become clear that the Bush administration's policy on nuclear deterrence and US nuclear weapons has been unsuccessful or at least ineffective. The North Korean nuclear weapons test, the actions of Iran in developing nuclear power infrastructure, which is suspected by our own government to be weapons related, and the US agreement with India shows that the philosophy of the Bush administration has at the very least encouraged nuclear weapons proliferation. … HOME views the motivating document for this action (NPR) to be flawed and dangerous, undermining years of non-proliferation work. As the principle philosophic document behind this action, HOME does not see how Complex 2030 could be in the best interest of the people of the United States. Therefore, the SEIS needs to fully explore the need for action here, and explain how this action will better advance the charge of securing the health and safety of the American people.*
>
> *- HOME, "scoping comments on Supplement to the Stockpile Stewardship and Management Programmatic Environmental Impact Statement," pg. 4.*

2|1C (cont)

The NNSA Act (Title XXXII of the National Defense Authorization Act for Fiscal Year 2000, Public Law 106-65) specifies the agency's national security missions:

1. To enhance United States national security through the military application of nuclear energy;
2. To maintain and enhance the safety, reliability, and performance of the United States nuclear weapons stockpile, including the ability to design, produce, and test, in order to meet national security requirements;
3. To provide the United States Navy with safe, militarily effective nuclear propulsion plants and to ensure the safe and reliable operation of those plants;
4. To promote international nuclear safety and nonproliferation;
5. To reduce global danger from weapons of mass destruction; and
6. To support United States leadership in science and technology.

The situation regarding new nuclear weapons states is not better now than it was when HOME submitted those comments. In fact, the situation is arguably worse. HOME believes that NNSA is failing on points 4 and 5 and likely on point 2 as well, and that the proposed action will further erode these important missions. The NNSA

6|1J

3

Hadder, John
Page 4 of 6

6|1J (cont) has not made the case that this action will motivate directives 4 and 5. There needs to be concrete evidence in the EIS that the approach outlined in the proposed action can be effective. The DSPEIS speaks of Complex Transformation as being a deterrent, but history has shown us over the past 60 years that active nuclear weapons programs to develop new nuclear weapons only encourages other countries to institute either openly or covertly nuclear weapons programs. For example, the following official press statement issued by the Ministry of External Affairs, New Delhi, India was released on May 11, 1998:

> *The Government is deeply concerned as were previous Governments, about the nuclear environment in India's neighborhood. These tests provide reassurance to the people of India that their national security interests are paramount and will be promoted and protected. Succeeding generations of Indians would also rest assured that contemporary technologies associated with nuclear option have been passed on to them in this the 50th year of our Independence.*

6|1J (cont) This kind of response to developing nuclear weapons technology is typical, and current activities by Iran and North Korea bear out the impulse for non-nuclear weapons states to become members of the nuclear club.

5|1D (cont) 6|1J (cont) HOME submits for the record that "Complex Transformation" as outlined in the DSPEIS is primarily a program for new nuclear weapons development with eventual testing, and as such undermines at least 2 of the mission objectives of the NNSA; therefore, not is the spirit of the law and possibly illegal.

Western Shoshone Treaty of Ruby Valley

Appendix D of the DSPEIS contains a table with the headings: Subtopic, Comment Summary, Documents SPEIS, and Reference. On page D-55 in the table under the heading comment summary the following statement if found:

> *Commentors stated that the SPEIS must include an explanation of how U.S. government and Shoshone Nation Agreement in the Treaty of Ruby Valley of 1872 can be ignored. The SPEIS must also include how gradual encroachment (as the ICC alleged and was upheld by the Supreme Court) is a plausible reason for taking of Shoshone land when that is the ruling of only one Nation (the US). The IACHR and UNCERD decisions that the U.S. was unjust in the taking of land need to be considered.*

Again, the US government is ignoring this issue. There is a reference to section 4.3.8 in the DSPEIS that presumably addresses this comment, yet HOME sees no discussion related to this concern. A phrase search of the entire document only found one reference to "ruby valley" or "Treaty of Ruby Valley," which is the italic statement above. HOME is outrages that the NNSA will not even acknowledge this issue even to claim it is not an issue, and the NNSA needs to include a discussion of this in the FEIS and apologize to the Western Shoshone for failing to reply.

7|14J5 For the record HOME duplicates our scoping comments on this issue below, since they were ignored the first time around:

> *The US government has continued to disregard (for example, Yucca Mountain Final EIS) its agreements between Western Shoshone Nation in the Treaty of Ruby Valley of 1872. The SEIS must include an explanation of how the DOE/NNSA can ignore an agreement between the US government and the Western Shoshone, which is a treaty between nations and the highest law of the land. Further, if the DOE/ NNSA uses the claim that lands were taken by the U.S. through gradual encroachment as the quasi-judicial Indian Claims Commission (ICC) alleged and upheld by the subsequent Supreme Court decision (Dann vs US Government) that the Western Shoshone lost title of their land, then it must explain how a ruling of a court within one nation (US Supreme Court) is binding upon both nations. Further, the DOE/NNSA needs to address the decisions of the Organization of American States Inter-American Commission on Human Rights (IACHR) and the United Nations Committee to Eliminate Racial Discrimination (UNCERD) which both found the U.S. to*

4

Hadder, John
Page 5 of 6

7|14J5 (cont.) *have violated the fundamental human rights of the Western Shoshone people with regard to the Indian Claims Commission Proceedings which led to the Supreme Court decision. On March 9, 2006, UNCERD again urged the United States to "freeze", "desist" and "stop" actions being taken, or threatened to be taken, against the Western Shoshone Peoples of the Western Shoshone Nation, including threats related to ongoing weapons testing at the Nevada Test Site as well as efforts to build an unprecedented high-level nuclear waste repository at adjacent Yucca Mountain. The SEIS needs to take into consideration both the IACHR and UNCERD decisions and describe the proposed action in the context of these decisions.*
- HOME, "scoping comments on Supplement to the Stockpile Stewardship and Management Programmatic Environmental Impact Statement," pg. 4.

Contamination at the Nevada Test Site (NTS)

In the comment summary table in Appendix D of the DSPEIS there is no mention of HOME's comments regarding the need to a complete characterization of the existing contamination at the NTS. Perhaps NNSA believes that our issues were addressed in Section 4.3 of the document. We will reproduce some of those comments here that appear not to have been addressed fully. In general, no new mission or facilities would be advanced without a complete understanding of the nature and degree of contamination.

1. Air Quality

8|14D4 Page 4-128 of the DSPEIS refers to 2006 air quality data and states that, "the estimated annual dose to the public from radiological emissions from current and past NTS activities is well below the 10 millirem per year dose limit (NTS 2007)." The data that this result is based upon is presumably presented in Table 4.3.4-2 (this should the clarified), but DSPEIS does not present the dose calculation. Appendix C has some discussion of radiation dose and the Latent Cancer Fatality as a measure of risk, but does not present even and overview of how the values (emission rates) in Table 4.3.4-2 are converted into dose. Key in such an overview is the realization of the complexity and uncertainty in these dose estimates that goes largely unappreciated by the public. The DSPEIS should also provide a map to show the sampling locations.

It should be noted that the total radiological emissions reported in Table 4.3.4-2 is 170 curies per year for tritium, and in the previous year a value of 560 curies per years was in reported in "National Emissions Standards for hazardous air Pollutants," June 2005 (DOE/NV/11718-1065). This difference is very striking for measurements just one year apart. Given the nature of air measurements this difference may not be anomalous, and the EIS again needs to reflect this level of uncertainty.

2. Water Quality

9|14O5 The DSPEIS indicates insignificant radiological contamination from the underground testing and states that, Analytical results from the network of onsite monitoring wells indicate that migration of radionuclides from the underground test areas is not significant," pg. 4-137. There is no presentation of data here, and no map showing where the monitoring is occurring.

It is HOME's understanding that the DOE has not conducted drill hole excavations within the underground testing areas with the purpose of elucidating the nature and potential movement of radionuclides from the various test shots. Source term information has to our knowledge been calculated, but no attempt to obtain physical data to understand the movement of radionuclides from test shots has been made. In fact, the perspective of the DOE has been that except for tritium, radionuclides have not escaped into the groundwater:

> *"Much of the radioactivity exclusive of tritium, remains captured in the original cavity, and thus not available to leach into the groundwater." - FEIS-NTS, Vol. 1, pg. 3-28.*

5

Hadder, John
Page 6 of 6

9|14O5 (cont.) The assumption in this statement of over 10 years ago has not largely changed today, and there is still no physical data to date to support this belief. The question of whether there are radioactive "plumes" moving with the groundwater from any of the test shots has never been settled. The EIS must detail the contamination of the groundwater with physical data, and show whether the above statement from the FEIS-NTS is valid. Without a full analysis of the existing contamination, there can be no complete and meaningful environmental analysis of the NTS as part of the proposed action.

3. Soil Quality

The NNSA appears to have ignored HOME's comments regarding soil contamination at the NTS and still sees the existing analysis in the DSPEIS as incomplete, so below we will duplicate our scoping comments with the hope that the NNSA will address our recommendations.

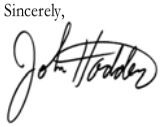
10|14F3 *The FEIS-NTS does contain some analysis of the existing contamination of the soils on the NTS. However, HOME sees this analysis to be insufficient, as has been made clear in the National Nuclear Security Agency (NNSA)/Defense Threat Reduction Agency (DTRA) attempt to conduct a high yield non-nuclear explosion, Divine Strake, at the NTS the summer of 2006. The State of Nevada just received (December 2006) a detailed soil analysis for the 1,000 ft radius encompassing the test area of Divine Strake. The State of Nevada will now be able to determine whether the test will conform to the existing air pollution permit for the NTS. The SEIS needs to fully disclose or determine the existing soil contamination data throughout the NTS and surrounding areas, especially downwind locations. The soil data ideally should contain the inventory of radionuclides present at various depths of soil, so that there is a complete understanding of the level and nature of the radioactive contamination. At the very least radionuclide analysis of the soil cores to a depth of about 20 centimeters should be detailed. It is this kind of data that is needed to evaluate the Divine Strake explosive experiment. Any soil disturbance at the NTS could loft radioactive particles in the air. Only when there is a detailed mapping of the soil, can there be a meaningful environmental evaluation of surface disturbances as a result of any activities at the NTS.*

The SEIS should also explore whether various plants and animals within and near the NTS have concentrations of radionuclides from the above ground testing period. HOME believes this to be necessary to understand impacts to people, especially indigenous, who either eat or handle various flora and fauna of the region.

- HOME, "scoping comments on Supplement to the Stockpile Stewardship and Management Programmatic Environmental Impact Statement," pg. 3

11|16A In summary HOME does not support the preferred action, which we see as encouraging proliferation and endangering the people of the United States and world. The proposed action undermines important aspects of the mission of the NNSA and should be considered illegal.

Sincerely,



John Hadder
Board Member
HOME, Healing Ourselves and Mother Earth
P.O. Box 6595
Reno, NV 89513

6

Haggarty, Patrick
Page 1 of 1

PC_1180

Levens, Matthew

From: Patrick Haggarty [pwhaggarty@msn.com]
Sent: Thursday, March 27, 2008 8:32 PM
To: Complex2030
Subject: Reject "Complex Transformation" plan to build nuclear weapons

Patrick Haggarty
2767 25th Avenue
Oakland, CA 94601-1334

March 27, 2008

Theodore A Wyka
Complex 2030 SEIS Document Manager
Office of Transformation, U.S. Department of Energy, NA–10.1 1000 Independence Avenue, SW.
Washington, DC 20585

Dear Theodore Wyka:

The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal.

1|1J Plans for designing a new
generation of nuclear weapons
is a bad idea for the following
reasons:
1. We already have thousands of nuclear warheads which we should be reducing in number,
not increasing.
2|3A 2. Building new nuclear devices only spurs other countries to do the same.
3. There is no place to put
any of the waste generated by fissile material research and weapons building. 4. We have
3|7J already killed many Americans (mostly Navajos) who mined the uranium that make up these
weapons. We do not want a new uranium holocaust in this country. 5. Research done at the
Livermore Labs is a great danger to millions of people living within a 40 mile radius.

By building up its nuclear arsenal right now, the US is essentially telling the world, "Do as I say, not as I do."

Sincerely,

Patrick Haggarty

1

Haines, Shauna
Page 1 of 2

PC_84 1732 McGee Ave.
Berkeley CA 94703
Feb. 24, 2008

Dear Mr. Wyka (and DOE),

I'd like to contribute to the public comment for the "Complex Transformation" proposal. I absolutely oppose this proposal to revamp and rebuild our stockpile of nuclear weapons! 1|16A

Are we to go back to the nuclear weapons program of the Cold War era? Why waste billions of our tax dollars building dangerous and unnecessary nuclear weapons, when we already have enough to destroy our entire planet 3 times over? This money would be better spent developing sustainable alternative energy projects, to address the global warming crisis and find an alternative to our dwindling fuel resources. 2|3A 3|9B

Haines, Shauna
Page 2 of 2

Sincerely,
Shauna Haines

Hale, Chad
Page 1 of 1

PC_1303

Levens, Matthew

From: Chad Hale [chadhale@bellsouth.net]
Sent: Tuesday, April 08, 2008 5:40 PM
To: Complex2030
Subject: Bomplex

1|9A 2|16A

Dear People:
As a citizen of the United States, I am voicing my opinion that our government should not spend the money, energy and time to rebuild atomic bomb making capabilities; we should not be making new nuclear weapons or gearing up to do so.

Thank you,
Chad Hale
369 Bass St., SE
Atlanta, GA 30315

1

Hale, Debbie
Page 1 of 1

PC_1391

Buenaflor, Delight

From: WARREN FINCH [wfinch@valornet.com]
Sent: Friday, March 14, 2008 12:21 AM
To: DIV.Complex.Transformation
Subject: Form posted from Windows Internet Explorer.

Last Name=Hale
First Name=Debbie
Email Address=244business@comcast.net
Street Address=7300 Luella Anne NE
City=ABUQUERQUE
State=NM
ZIP Code=87109
Comments=I SUPPORT THE NNSA ALTERNITIVE FOR SANDIA NATIONAL LAB AND LOS ALAMOS NATIONAL LAB.
1|15A

1

Haley, Sharon
Page 1 of 1

PC_1533

Levens, Matthew

From: Sharon Haley [rae@99west.com]
Sent: Tuesday, April 15, 2008 4:26 PM
To: Complex2030
Subject: No more support for anything nuclear

Sharon Haley
31964 Weldon Rd
Lebanon, OR 97355-9732

April 15, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

2|8A 1|16A cont. Congress rebuked the Energy Department's last attempts to upgrade the arsenal by defunding the Reliable Replacement Warhead and last year's proposed mega-scale bomb plant. The CMRR project is another irresponsible new program that should be rejected.

3|10B 4|1K This administration following the corporate elite agendas are systematically destroying this planet and all forms of life on it in every way possible. This must not continue.

Sincerely,

Sharon Haley
5412584900

1

Hall, James
Page 1 of 1

PC_1048

LOS ALAMOS COUNTY
P.O. Box 30 Los Alamos, NM 87544 (505) 663-1750 Fax (505) 662-8079
Website: www.losalamosnm.us

COUNTY COUNCIL
Council Chair
Jim Hall
Council Vice-Chair
Robert B. Gibson
Councilors
Frances M. Berting
Nona Bowman
Kirn H. Milder
Jim L. West
Michael O. Wheeler

COUNTY ADMINISTRATOR
Alex H. Baker

March 5, 2008

Theodore A. Wyka
Complex Transformation
SPEIS Document Manager
Office of Transformation, NA-10.1
US Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Wyka:

With this letter, Los Alamos County submits official comment on the *Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement (SPEIS) DOEIEIS-0236-S4.*

1|7N 2|15A.1 The Los Alamos County Council endorses the preferred alternative for Los Alamos National Laboratory (LANL) as described in the SPEIS, Sec. S.3.17. The preferred alternative recognizes and builds upon the unique capabilities and infrastructure that exist at LANL to support current national security policy.

3|10B Los Alamos County also endorses locating super computing efforts at LANL, along with other essential security missions, as they both enhance LANL's prospects for continuing its 65 years of contributions to the security of the nation.

Many of the contributions to the nation arise from LANL's R&D activities in a broad range of programs including: non-nuclear defense; nuclear and non-nuclear energy; material; atmospheric, space and geosciences; bioscience and biotechnology; and the environment, as evidence by the prestigious R&D 100 Awards, of which LANL receives several each year. Enhancement of these types of endeavors is essential for attracting top scientists and maintaining the scientific health and vitality of the Laboratory and the economic health of the region. The Los Alamos County Council therefore endorses continuing and strengthening opportunities for this additional research.

Los Alamos County hereby expresses its strong support for LANL, whose most significant contributions to the nation lie not in the past but in the future.

We continue to review the SPEIS. More detailed formal comments may be submitted later in the comment period.

Sincerely,

James W. Hall
Chair, Los Alamos County Council

LOS ALAMOS, N M

Hallahan, Mary
Page 1 of 1

PC_1809

Levens, Matthew

From: Mary Hallahan [srmary@twcny.rr.com]
Sent: Friday, March 28, 2008 4:59 PM
To: Complex2030
Subject: Comment about nuclear development

Mary Hallahan
568 E. Main St.
Malone, NY 12953-2034

March 28, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

March 28, 2008

Dear Senator Schumer:

1|1K I stongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

2|16A I am also opposed to plans to modify nuclear facilities across the country, which would make it easier for the U .S. to rebuild its nuclear arsenal.

3|1J How can we develop the capacity for nuclear weapons and insist that others do not do the same? We can be the example for the other countries by practicing what we demand of others. There are other means to promote peace but not by building up arms.

4|9B I trust our voices will be heard before some great catastrophe happens. Let's spend some money in building up our citizens by promoting jobs, education, health plans and much more that is needed by our people.

Thank you for considering my opposition.

Sincerely,

Mary Hallahan
518-481-5169

1

Hallahan, Mary
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PC_1863

Levens, Matthew

From: Sr. Mary Hallahan [srmaryh@twcny.rr.com]
Sent: Friday, March 28, 2008 4:16 PM
To: Complex2030
Subject: Complex Transformation

1J I join many others who are opposed to this plan to overhaul the U.S. Nuclear Weapons Complex. Why can't we be an example for the rest of the world; we who preach social justice and prevent others from having nuclear power but plan on using it ourselves-please stop this plan. Prayerfully, Mary Hallahan

1

Hammon, Duncan

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PC_1348

Buenaflor, Delight

From: Duncan Hammon [hammon@lanl.gov]
Sent: Friday, April 04, 2008 12:58 PM
To: DIV.Complex.Transformation
Subject: Form posted from Microsoft Internet Explorer.

Last Name=Hammon
First Name=Duncan
Email Address=dlhammon@gmail.com
Street Address=392 Bryce
City=Los Alamos
State=NM
ZIP Code=87544
Comments=The Pit Production mission should be separated from LANL. Production activities are incompatible with the culture and mission of a National Laboratory. The desired character of the workers, procedures, management styles, etc. that work for production do not work for research.
Pit production could stay at Los Alamos but it should be operated under a separate contract with a different manager.

1|10B

1

Hampton, Idella

Page 1 of 1

PC_68 Feb 8, 2008

Mr. Wijka,

1|1F We should meet our obligation to the Non-proliferation Treaty to pursue disarmament. The money is needed to do good things for the people of the U.S. There is no greater need than the health, education, mental and physical and spiritual needs of our country. We do not need a new bomb plant.

2|9B

3|16A

Idella Hampton
5830 Manning Ave.
Cinti. Ohio 45227

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PC_965

April 30, 2008 Via email to: complextransformation@nnsa.doe.gov

Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Ave., SW
Washington, DC 20585 RE: Draft Complex Transformation SPEIS Comments

Dear Mr. Wyka:

Southwest Research and Information Center (SRIC), a 37-year old nonprofit organization involved with health, energy, and environmental issues, submits the following comments on Draft Complex Transformation SPEIS, hereinafter the Draft SPEIS or "Bombplex." The comments should be considered in addition to those oral comments made on behalf of SRIC by Don Hancock at the March 11, 2008, hearing in Albuquerque. As you know, DOE must fully consider and respond to all comments.

The Draft SPEIS is legally flawed and DOE cannot now proceed to issue a legally and technically adequate Final SPEIS.

1|2.H.2 1. The Draft SPEIS does not rigorously evaluate all reasonable alternatives.

The twin functions of the Environmental Impact Statement (EIS) are to "require that agencies take a 'hard look' at environmental consequences, and provide for broad dissemination of relevant environmental information." See *Robertson v. Methow Valley*, 490 US 332, 350 (1989). Adequate time for significant public participation and complete response to public comment also is required. SRIC believes that the comment period on the Draft SPEIS should have been extended for 90 days because of its importance and complexity.

The discussion of alternatives is the legally required heart of any EIS. 40 CFR § 1502.14. The legally adequate EIS must "[r]igorously explore and objectively evaluate all reasonable alternatives, and for alternatives which were eliminated from detailed study, briefly discuss the reasons for their having been eliminated." 40 CFR § 1502.14(a).

2|7.O.1 Nonetheless, the Draft SPEIS leaves out the alternative that more than 95% of the scoping commentors supported – a No Production Alternative. The Draft SPEIS states: it "does not analyze alternatives to the United States' national security policy. Rather, it examines the environmental effects of proposed actions and reasonable alternatives for execution of the program based on the existing policy and foreseeable changes in this policy." at 2-1.

That explanation is political and does not provide an adequate legal basis to exclude the No Production Alternative. Such an alternative would analyze the nuclear weapons complex that would produce no nuclear weapons, would conduct no nuclear weapons testing in Nevada, would safely store and dispose of radioactive and hazardous wastes from past nuclear weapons production, and would decontaminate and decommission nuclear weapons facilities that are no longer needed, among other things. There should be a detailed discussion of that alternative and its environmental impacts in a revised Draft SPEIS that is issued for public comment.

Hancock, Don
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3|1F Even though the political decision about what to include in the SPEIS excluded the alternative of complying with the U.S. Constitution and Article VI of the Nonproliferation Treaty, which the U.S. ratified in 1969, it is possible that future presidents and congresses will want to do so. Unfortunately, the SPEIS does not provide the basis to do that, obviously trying to restrict the information that would be needed and the legal basis for such action. While that political decision may meet the policies of the current administration, it does not comply with the requirements of the National Environmental Policy Act (NEPA).

4|7.A.7 Another reasonable alternative has been discussed in appropriations bills and congressional committees controlled by Republicans: substantial consolidation and elimination of nuclear weapons facilities. But the Draft SPEIS also does not consider that consolidation alternative, or even the more limited consolidation for the three weapons laboratories. The Draft SPEIS dismisses consolidation of the three weapons laboratories based on 1995 decisions. at 3-127. Of course, the world has changed since 1995 and updated analysis is required about whether consolidation is a reasonable alternative. The Draft SPEIS has not conducted such an analysis, which must be done in a revised Draft SPEIS that is reissued for public comment. Furthermore, people in New Mexico, South Carolina, Tennessee, Texas, Nevada, California, and Missouri are not apprised of what the impacts of closing or substantially reducing the nuclear weapons missions would be. There is no discussion of whether the weapons facilities and personnel could change their mission to renewable energy, environmental cleanup, nonproliferation, and other necessary programs and what the impacts would be, as is required by NEPA.

3|7.O.1 (cont.) Of course, the Draft SPEIS does not discuss the environmental impacts of the No Production or the Substantial Consolidation alternatives. The alternatives and their environmental impacts must be included in a revised and reissued Draft SPEIS for public comment, because the Draft "is so inadequate as to preclude meaningful analysis." 40 CFR § 1502.9(a).

5|7.M.1 2. The Draft SPEIS does not adequately analyze the environmental impacts of the alternatives that are discussed.

The legally required "hard look" at environmental impacts must include the consequences of using the nuclear weapons under the alternatives presented. The analysis should include the impacts of using some or all of the warheads against one or more nations or non-national groups. The impacts considered should be on the locations where the nuclear weapons would be used, as well as on the United States. There is no such analysis in the Draft SPEIS, even though SRIC specifically stated in its scoping comments that such an analysis is required.

6|8.B.1 The Draft SPEIS does not adequately analyze the impacts of the proposed future weapons complex. The assertions in the Draft SPEIS that the "Reliable Replacement Warhead" (RRW) program would create less environmental impacts is not proven. at 2-21. Any nuclear weapons complex, with or without RRW, will create radioactive and hazardous waste, and the Draft SPEIS does not adequately analyze the environmental impacts of those wastes for the alternatives discussed.

7|14.M.4 For example, the environmental impacts of the transuranic (TRU) waste produced by the Bombplex should be analyzed based on the presumption that the waste will be stored and

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Hancock, Don
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disposed forever at the generator site. The Draft SPEIS does not do that. Instead, it assumes: any TRU waste from a CPC is "disposed of at the Waste Isolation Pilot Plant (WIPP)." at 3-22. Contradictorily, the Draft SPEIS also assumes "for the purposes of transportation analysis only" that WIPP is the disposal location. at 10-24. There are multiple inadequacies with such an analysis. It does not analyze the most likely reasonable alternative – that the generator site would be the storage and disposal location. It does not adequately analyze the impacts on WIPP of having more waste for a longer period of time (the 10-year old analysis in the WIPP SEIS-II is out of date and inadequate). The transportation analysis is not conservative because if there is off-site storage and disposal at a location other than WIPP, the shipping distances could be longer, the number and types of accidents higher, the transportation modes (adding rail transport) and routes would be different than for WIPP. Thus, the Draft SPEIS analysis is not bounding.

7|14.M.4 (cont.)

Further, since the CPC is presumed to operate from 2022 to around 2072 (at 3-21), the huge majority of the TRU waste would be generated after WIPP closes in about 2030. Thus, the alternatives are to leave the waste at the generator site CPC or to have a new disposal facility, not to assume that the waste would go to WIPP. A Draft SPEIS should discuss and analyze each of those three alternatives.

In addition, TRU waste generation amounts in the Draft SPEIS do not make sense and are not credible. Table 3.4.1-6 on page 3-30 says that LANL producing 20 pits a year or 50 pits a year generates the same amount of TRU, which is not credible. The source for the table is "NNSA 2007," which is the Data Call. That document is 609 pages, but from SRIC's search, it does not have the TRU waste information shown on Draft SPEIS Table 3.4.1-6. The Data Call does have Table 3.4.1-4 "CPC Waste Volumes," which shows increasing amounts of TRU being generated from 125 to 200 pits per year of 590 cubic meters to 730 cubic meters (770 cubic yards to 955 cubic yards). In contrast, the Draft SPEIS Table 3.4.1-4 and Table 3.16-1 show that the CPC 200 pits per year surge generates 850 cubic yards annually (rather than the 955 cubic yards shown in the Data Call). The Data Call also has Table 5-39, which is the No Action/Routine Operations Alternative which shows annual LANL generation of 570 cubic yards of TRU waste. Note b of that table indicates that the values are based on 20 pits produced per year. Table 5-47, the Expanded Operations Alternative, shows that 860 cubic yards of TRU waste would be generated annually. Note i on that table states that assumes "pit production of up to 80 pits per year." In contrast, Table 3.4.1-10 of the Draft SPEIS states that the LANL 50/80 Alternative would generate 575 cubic yards of TRU solid waste annually, including 75 cubic yards per year for 10 years from PF-4. SRIC does not believe any of the TRU waste volumes are credible. Table 3.4.1-7 of the Draft SPEIS shows that the "Los Alamos Upgrade" would generate 200 cubic yards of TRU waste (presumably during the entire construction, rather than annually). Since DOE does not use the volumes consistently, it is implicitly agreeing that it does not have credible estimates. Once again, since DOE does not have credible volume estimates, it cannot make a credible, bounding analysis of environmental impacts. DOE must develop credible TRU waste estimates and analysis of environmental impacts and then issue a revised Draft EIS for public comment, because the Draft "is so inadequate as to preclude meaningful analysis." 40 CFR § 1502.9(a).

8|14.M.9

The Draft SPEIS also does not analyze the costs of maintaining a large nuclear weapons "Bombplex" for the next century. Such an analysis is required to meet one of the purpose and

9|9.I.1

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Hancock, Don
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need statements that the SPEIS is to address – the "cost-effective" nuclear weapons complex. One of the reference documents to the Draft SPEIS, a December 2007, "Independent Business Case Analysis of Consolidation Options for the Defense Programs SNM and Weapons Production Missions" concludes that "NNSA spends $1.8 billion (including $200 million for SNM transportation) annually on SNM operations, of which about $300 million is devoted to new construction or renovation." at iii. "At least an anticipated $100 million per year will be required for routine maintenance; thus, at a constant budget level, only $200 million annually would be available for construction of new facilities. Clearly, this is insufficient for implementation of any of these consolidation options on the schedules proposed in the SPEIS." at ix. In summary, "[t]he cash flow figures demonstrate that significant increases from baseline funding will be required to modernize and consolidate the SNM production complex." at xi.

9|9.I.1 (cont.)

So another inadequacy of the Draft SPEIS is that it does not even inform the public and policymakers that the "preferred alternative" cannot be funded by the current weapons budget, which is equivalent to the Cold War peak spending. That information must be discussed along with description and analysis of alternatives that would cost less to construct and operate.

Furthermore, the Draft SPEIS does not adequately discuss the total amounts of radioactive and hazardous waste that would be generated by the Bombplex nor the costs of storage and disposal of those wastes. Neither the Draft SPEIS nor any other document has discussed the alternatives for storage and disposal of those waste, nor the environmental impacts of storage, transportation, and disposal. No decisions can be made about the Bombplex without such a NEPA analysis. Once again, the Draft SPEIS must be revised and reissued for public comment because the Draft "is so inadequate as to preclude meaningful analysis." 40 CFR § 1502.9(a).

7|14M.9 (cont.)

The discussion in the Draft SPEIS on pages 5-404 to 5-409 is entitled "Impacts of Transferring Category I/II SNM from Pantex Zone 4 to Zone 12." However, the discussion does not provide an adequate basis for any decisions about moving of the "60 metric tons" of plutonium pits.

SRIC has doubts as to whether the figures in the Draft SPEIS regarding the DOE-owned and controlled property are correct. DOE or other federal agencies on its behalf have been trying to purchase land surrounding the Pantex site over the past few years, and apparently have acquired some additional surrounding land. The SPEIS must include information about the actual amount of DOE owned and controlled property as part of its baseline discussion about the site as well as in the analysis of the environmental impacts.

10|5.N.2

The Draft SPEIS does not provide the basis for moving any SNM from Zone 4 to Zone 12. Indeed, the transfer could lessen security. Zone 4 is farther removed from the Pantex boundary than is Zone 12. Placing plutonium pits in close proximity the weapons assembly and disassembly activities in Zone 12 would seem to increase risk, both to the pits and other operations within Zone 12, as compared with maintaining the current mile or more of separation. The Draft SPEIS must more fully discuss the security issues and analyze the environmental impacts of not moving the pits from Zone 4, increasing security of the pits in Zone 4, as well as moving them to Zone 12.

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11|1.P

Another aspect that should be considered, and is missing from the Draft SPEIS, relates to the possibility of international inspections of the pits to provide transparency as to whether the U.S. provides access to international inspectors. Having pits stored in a location separated from weapons assembly and disassembly operations would appear to be better suited for international inspections. But there is also no analysis of that possibility in the Draft SPEIS.

SRIC has long advocated that plutonium pits be immobilized so that they could no longer be used for weapons without very substantial additional processing and that the immobilized plutonium be prepared for disposal. The Draft SPEIS does not consider that alternative or its environmental impacts.

10|5.N.2 (cont.)

Another reasonable alternative is to "deform" the pits in some way so that they would not be readily usable in warheads. There are various ways that pits could be modified so that they would not longer be able to be placed into warheads. The SPEIS must analyze such options as alternatives to moving the pits and as security alternatives for the pits. The Draft SPEIS does not consider that alternative or its environmental impacts. Thus, the SPEIS cannot be used as the basis for any decisions about whether or not to move plutonium pits from Zone 4 at Pantex.

The Draft SPEIS states that "NNSA does not currently see a need to resume nuclear testing to certify the safety, security, and reliability of the U.S. nuclear deterrent." at 2-19. Given that presumption and the Draft SPEIS goal to reduce the footprint of NNSA, the Draft SPEIS should analyze the alternative of mothballing the Nevada Test Site (NTS) stockpile stewardship activities and the environmental impacts of that action. The waste management and environmental restoration activities at NTS must be maintained for decades to come.

12|14.D.2

The Bombplex would continue open-burn/open detonation areas at several sites. The Draft SPEIS must consider the alternative of eliminating all such areas because of the hazard to the public and the air pollution created. The public cannot do open burning of trash, and DOE should not be allowed to do open burning of hazardous, explosive, and radioactive materials.

The Bombplex would also continue waste "disposal" in unlined pits and trenches at various sites. Such sites can leak, so the practice should be abandoned. The Draft SPEIS should fully consider ending such practice and discuss the alternative storage and disposal methods at each site and it should fully discuss the environmental impacts of the existing practice and the alternatives.

3. <u>The Bombplex must be described and analyzed in a stand alone Programmatic Environmental Impact Statement, not as a supplement to the Stockpile Stewardship and Management (SSM) PEIS.</u>

13|2.B

SRIC raised this legal inadequacy in its scoping comments. On page D-15, the Draft SPEIS notes that this issue was raised in scoping comments and references Section 1.5, 1.6, 2.0, 2.1, 2.5, and Chapter 3 of the Draft SPEIS as its response. However, none of those cited sections actually provides an analysis of whether a new PEIS is needed.

The purpose and need for the SSM PEIS is on pages 2-7 to 2-10 of that document. A fundamental part of the purpose and need for the SSM PEIS was because "[t]he United States has stopped the development and production of new-design nuclear weapons." at 2-7. The two

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Hancock, Don
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new needs identified were to "[m]aintain the core intellectual and technical competencies of the United States in nuclear weapons" and "a safe and reliable U.S. nuclear weapons stockpile." Id.

13|2.B (cont.)

In contrast, the Draft SPEIS specifically describes a Bombplex in which new-design nuclear weapons could be an important part – the RRW program. Such a requirement is not consistent with the SSM PEIS, so DOE has a new proposed action – new-design nuclear weapons – and it must have a new PEIS.

Further, the Draft SPEIS has a new third purpose, not included in the SSM PEIS: "Create a responsive nuclear weapons infrastructure that is cost-effective, and has adequate capacity to meet reasonably foreseeable national security requirements; and consolidate Category I/II SNM at few sites and locations within sites to reduce the risk and safeguards costs." at 2-1. That additional purpose could also be best considered in a new PEIS.

Thus, SRIC concludes that as a matter of law DOE must stop the SPEIS process and instead issue a new, stand-alone Bombplex Draft PEIS, if it intends to consider that new proposed action of new-design nuclear weapons.

As SRIC strongly opposes new-design nuclear weapons or new plutonium pit production capabilities, the preferred option is the revise and reissue for public comment a new Draft SPEIS which specifically precludes any new-design nuclear weapons and considers the reasonable alternatives and their environmental impacts.

4. <u>The Draft SPEIS does not meet the minimum legal requirements for responding to public comments.</u>

14|2.A.1

SRIC submitted both oral and written scoping comments on the Bombplex. While the Draft SPEIS acknowledges that 33,000 comments were received, it provides no index of the commentors, so SRIC and others cannot determine that its scoping comments were considered and responded to. Indeed, it is clear that some of SRIC's scoping comments, such as those related to the required analysis of use of nuclear weapons, the need to analyze the impacts of storing and disposing of all wastes at the generator sites, and the need to provide full cost estimates, were not responded to, a clear violation of the National Environmental Policy Act (NEPA) and DOE NEPA regulations (10 CFR 1021.311(e)). SRIC and any other commentor should be able to verify that their comments were considered, which the Draft SPEIS does not do. The listing of document numbers on pages D-12 to D-72 does not allow SRIC or other commentors to ascertain which numbers were assigned to their comments, since there is no master list of commentors by number provided. DOE must have a publicly available list of all commentors and how their comments were considered.

5. <u>There are many factual and typographical errors in the Draft SPEIS</u>

15|2.J

Perhaps the errors are another indication of the political decision made to rush to complete an SPEIS, no matter how legally and technically inadequate, during the Bush administration.

Some examples of the errors are the following.
Contrary to the statement (at 2-5), President Clinton did not "direct" the nuclear testing moratorium in 1992. It was President George H.W. Bush.

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Hancock, Don
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Pages 3-124 and 5-405 state that Table 3.7-2 shows the requirements for a new Zone 12 pit storage facility at Pantex. However, Table 3.7-2 actually relates to Lawrence Livermore National Laboratory (LLNL), not Pantex. Table 3.7-3 relates to Pantex. However, as noted above, the analysis of alternatives and environmental impacts in the Draft SPEIS regarding pit storage is grossly inadequate and cannot serve as the basis for any decisions about pit storage.

15|2.J (cont.)

Pages 5-308 and 5-313 provide very different amounts of legacy TRU waste inventory at the Savannah River Site (SRS) while citing the same source document. Page 5-308 states that the inventory is "of 43,167 cubic yards of legacy TRU waste (WSRC 2002a)." In contrast, Page 5-313 states that the inventory is "of 14,389 cubic yards of legacy TRU waste (WSRC 2002a)." Clearly, the two figures, one of which is three times higher than the other, cannot both be correct. SRIC believes that neither figure is accurate based on more recent documentation, including the WIPP inventory for the Environmental Protection Agency recertification.

Pages 3-165 and 6-15 also use apparently inconsistent TRU waste volumes. Page 3-165 shows that TRU waste generation at SRS in 2001 was 64.1 cubic yards of TRU and 380 cubic yards of Mixed TRU. Page 6-15 shows "current" SRS TRU waste generation as 88 cubic yards. As already noted in #2 above, the TRU waste volume numbers are not credible, including for SRS.

Once again, the Draft SPEIS must be substantially revised and re-issued for public comment to correct those major deficiencies because the Draft "is so inadequate as to preclude meaningful analysis." 40 CFR § 1502.9(a).

Thank you for your full consideration and response to SRIC comments, including the scoping comments, and to all of the other tens of thousands of commentors.

Yours truly,

Don Hancock
Southwest Research and Information Center
PO Box 4524
Albuquerque, NM 87196-4524
505/262-1862
www.sric.org
sricdon@earthlink.net

Hand-In, Santa Fe Public Meeting
Page 1 of 2

PC_1018

nuclear watch new mexico

Permanent Plutonium Pits = Permanent Risks

Now that the Los Alamos National Laboratory (LANL) has been designated as the preferred site for permanent pit production, what else comes along with this dubious distinction? **Permanent spending of taxpayers' money, permanent increased risk to the public, permanent increased water use, and permanent increased waste production come along with the preferred alternative, too.** Expanding pit production may also be a permanently wrong direction, constricting the opportunity for needed mission diversification at the Lab to address today's critical national security issues, such as WMD proliferation, maritime port security, energy independence and global climate change.

The National Nuclear Security Administration (NNSA), the Department of Energy's nuclear weapons agency, is proposing to revitalize and transform its nuclear weapons complex, for which pit manufacturing at LANL is the crucial production mission. The NNSA "Complex Transformation" plan calls for LANL to produce 50 to 80 pits per year. The impacts of this "50/80 Alternative" follow. Some of the other alternatives have greater estimated impacts and increased risks.

In order to produce 80 pits, LANL needs a new facility. The current estimated construction cost is $2 billion dollars for the Chemistry and Metallurgy Research Replacement (CMRR) project, which is the proposed facility that will directly support pit production at LANL. The annual cost for operating facilities at LANL's expanded plutonium complex, for which CMRR is the keystone, will be $240 million per year. Separately designated pit production costs are approximately the same. Annual security costs will be $45 million. **The total operational costs for plutonium pit production at LANL will be around a half-billion dollars per year, and this does not include facility construction and upgrades costs.**

1|14F
2|14N

If a serious seismic event were to occur at LANL, there would be widespread damage. Facilities at LANL would be affected and the public and workers at the site would be exposed to increased risks from both radiological and chemical releases. A recent seismic study predicts 50% greater ground motion than previously believed. Because of the Lab's seismically fragile fire water supply system, sustained fires may occur. The accident with the highest postulated consequences to the offsite population is this combined earthquake and fire scenario. **A projected 26 "Latent Cancer Fatalities" (LCFs) in the offsite population within a 50-mile radius could result from such an accident.** A person at the boundary of LANL, called the "maximally exposed individual" (MEI), would have a one in 19 chance of an LCF. Granted, earthquakes are low-probability events, but building plutonium facilities in a seismically vulnerable zone is literally playing with fire.

2|14N (cont)

Other postulated accidents could affect the offsite population as well. One is an explosion in a plutonium feed casting furnace used for pit production. **For this accident, there is a projected 19 Latent Cancer Fatalities to the population within a 50-mile radius.**

551 West Cordova Road #808 Santa Fe, New Mexico 87505 505.989.7342
info@nukewatch.org www.nukewatch.org

santa Fe, NM

Hand-In, Santa Fe Public Meeting
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More Precious Water

3|14E2 Under expanding plutonium pit production, **the 50/80 Alternative would accelerate LANL's water use by approximately 12 percent, or an increase of 43,000,000 gallons per year**. Clearly, water is northern New Mexico's most precious resource. In an uncertain future, why should more water be devoted to unneeded bomb production?

The Preferred Alternative – Permanently Increased Waste

4|14M4 The 50/80 Alternative would generate an additional **575 cubic yards of radioactive transuranic (TRU) waste per year, triple the amount produced in 2005.** It is proposed that this increasing TRU waste be packaged and shipped to the Waste Isolation Pilot Plant (WIPP) in southern New Mexico for disposal. However, WIPP is already about 40% full from past bomb making and the remaining space is already all accounted for. There is currently no room for added TRU waste. Further, the CMMR is planned to operate for 30 years after WIPP's scheduled closure in 2035. Where will yet more bomb-making wastes go?

The 50/80 Alternative will also generate an estimated **1,850 cubic yards of "low-level" radioactive wastes annually**. These wastes would be processed at the Solid Waste Management Facility in TA-54 and disposed of on-site at TA-54's Area G. But Area G itself is due to be closed in 2015. There is still time for the public to convince the New Mexico Environment Department to require that LANL remove this waste rather than cap and cover and leave it in place as the Lab plans. However, LANL also plans to expand Area G into "Zone 4," which will be much of the same – unlined dumps above our aquifer that will likely leave radioactive wastes permanently.

The 50/80 Alternative would generate an **additional 265 tons of hazardous chemical waste annually**. LANL generated 217 tons in 2005. All these wastes have to be collected at four existing storage facilities (two additional ones are planned) for shipment and disposal at an offsite commercial facility.

Other Potential Impacts of the Preferred 50-80 Alternative

5|14G **TA-55 contains core and buffer "Areas of Environmental Interest" for the Mexican spotted owl**, a federally listed threatened species, and other threatened bird species may use the habitat for foraging or hunting. However, it is expected that the 50/80 Alternative would have minimal affect on the Mexican spotted owl because construction will be in an existing highly developed area. In other words, the owls were run out of this area long ago.

6|14H1 Due to the high density of Ancestral Puebloan artifacts at LANL, there is a high probability that "cultural resources" could be impacted during construction anywhere on Lab property, including TA-55. Will construction be permanently stopped if an archeological resource is found?

–SK March 13,2008

Submit comments on the Complex Transformation to: ***ComplexTransformation@nnsa.doe.gov***

Hanrahan, Tom
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PC_788

Levens, Matthew

From: Wyka, Ted
Sent: Thursday, February 28, 2008 6:14 PM
To: Complex2030
Subject: Fw: Y-12 National Security Complex

----- Original Message -----
From: Hanrahant@aol.com <Hanrahant@aol.com>
To: Wyka, Ted
Sent: Thu Feb 28 18:12:12 2008
Subject: Y-12 National Security Complex

Dear Mr. Wyka,

1|15A 2|7N 3|10I As a small businessman in Oak Ridge and as an engineer who formerly performed safety analysis work at the Y-12 facility, I am in full support of the NNSA's preferred alternative to maintain the specialized uranium mission at Y-12 in Oak Ridge and establish Y-12 as one of the NNSA'a Centers of Excellence.

Tom Hanrahan, P.E.
Realty Center, Inc.
201 S. Tulane Ave.
Oak Ridge, TN 37830

**********Ideas to please picky eaters. Watch video on AOL Living.
(http://living.aol.com/video/how-to-please-your-picky-eater/rachel-campos-duffy/2050827?NCID=aolcmp00300000002598)

1

Hanson, Earle

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PC_250

Draft Complex Transformation
Supplemental Programmatic
Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

NNSA National Nuclear Security Administration

Written Comment Form

Must be received on or before April 10, 2008.

Ted

I would like to discuss the significant impacts that moving GTS and Tritium R&D away from Los Alamos would have on our ability to maintain the reliability of the Stockpile. 1|3E.1

I would like to discuss this in a classified area

Earle Marie Hanson
672-9576
Cell 505 412-1778

former Lead of Los Alamos Lead Lab effort for Complex 21
former Deputy Program Director Nuclear Materials & Stockpile management
- Former ESH (Weapons Engineering) Division Leader

Please use other side if more space is needed.

Comment forms may be mailed to:
Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Comment forms may be faxed to:
(703) 931-9222
or sent by electronic mail to:
complextransformation@nnsa.doe.gov

You may also submit comments through the project website which can be found at:
http://www.complextransformationspeis.com

Hanson, Earle

Page 1 of 2

PC_997

Good Afternoon.

1|16A I am Earle Marie Hanson and I am speaking today to register my strong opposition to the preferred alternative option of moving Gas Transfer System (GTS) responsibility from Los Alamos to Sandia and of moving tritium R&D support from Los Alamos to SRS.

I retired from Los Alamos National Laboratory in 2003 after working for 27 years in the weapons program. During my last 12 years I led the Los Alamos Complex 21 Lead Lab program identifying and developing the technologies and facilities required to support the nuclear weapons program of the 21st century. I later served as Deputy Program Director for Nuclear Materials and Stockpile Management assuring that Los Alamos maintained the needed materials capabilities and facilities in a safe and secure manner and met certain stockpile deliverables. During the last five years of my career, I was Division Leader for the Engineering Science and Applications Division , which was the weapons engineering division responsible for the oversight and evaluation of the stockpile surveillance program, weapons engineering design, high explosive fabrication for local tests, GTS design and testing, tritium R&D and some fabrication in support of the stockpile. I mention my credentials to impress upon you that I am knowledgeable of what it takes to maintain a safe and reliable nuclear deterrent.

2|15A I support the need to reduce the number of nuclear weapons in the stockpile and to create a smaller, more cost-effective and fully responsive nuclear weapons complex. On the whole I support the preferred alternative for complex transformation as outlined in this meeting, but I believe that the preferred alternative to move Gas Transfer Systems (GTS) to Sandia and Tritium R&D to SRS is totally wrong. **It is very short sighted from a programmatic perspective and counter to the goal of maintaining the safety and reliability of the stockpile and our ability to respond to issues in an agile and flexible manner .** The Gas Transfer System technology is a very important part of maintaining the reliability of the stockpile. **It is a flexible, cost-effective and relatively quick way of addressing some unforeseen problems that might arise in our aging stockpile. I would be happy to provide examples of this in a classified venue.** 3|7N

Because of its critical importance to the stockpile, it would be best if GTS design technology could be maintained at both Sandia and Los Alamos, but barring that option, it is essential to maintain this technology at Los Alamos. Los Alamos has responsibility for the majority of the boost systems in both today's and the future stockpile. We have capability in all of the GTS technologies in the stockpile and have been responsible for most of the boost systems that have been fabricated in recent years and are planned for the near future. We have excellent in-house facilities for GTS R&D using both hydrogen and tritium gas. We have the expertise not just to design systems, but to troubleshoot any anomalies that might arise in surveillance testing, and the demonstrated flexibility to respond to these findings. The GTS facilities at Los Alamos are modern and functional. It would not be cost-effective to dismantle them and try to establish them at another site. To be poised to address any stockpile problems that might arise, one must have a trained and dedicated staff that is involved in real-time R&D working with the technologies, improving surveillance techniques, and understanding the materials and aging issues. Working with the many tritium R&D storage samples, which are stored at Los Alamos, helps maintain this expertise.

SRS is good at production activities such as filling bottles and conducting routine surveillance testing, but they are not as effective at doing one of a kind R&D experiments such as are needed to address possible stockpile anomalies. GTS design engineering and tritium R&D work hand in hand at Los Alamos to deliver a superior product. The cost of maintaining GTS and tritium R&D capabilities at Los Alamos is quite small relative to the overall cost of running the nuclear weapons complex, yet the importance of this work should not be underestimated with respect to maintaining the safety and reliability of our nuclear deterrent. 1|16A (cont.)

In closing I respectfully request that NNSA reconsider their proposed alternative for GTS technology and maintain both GTS design and testing capability and tritium R&D capability at Los Alamos.

Hanson, Earle
Page 2 of 2

Please review the comments on the back of this page.

Thank you.
Earle Marie Hanson
3-13-2008

Please use other side if more space is needed.

Comment forms may be mailed to:
Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Comment forms may be faxed to:
(703) 931-9222
or sent by electronic mail to:
complextransformation@nnsa.doe.gov

You may also submit comments through the project website which can be found at:
http://www.complextransformationspeis.com

Los Alamos, NM(AM)

Hanson, Mary
Page 1 of 2

PC_1610

Levens, Matthew

From: hansonmary@hotmail.com
Sent: Saturday, April 05, 2008 7:05 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|1J There is no reason to assume that nuclear weapons will or should exist for the long term. Both Clinton and Obama are on record supporting de-alerting, and reducing/changing the emphasis on nuclear weapons. With Kissingor et al supporting total nuclear disarmament, this is an opportunity to make the world safer by eliminating nuclear weapons .

2|15A 3|3A While I applaud the Department of Energy for wanting to consolidate and reduce the facilities, workforce, and redundant capabilities within the nation's sprawling nuclear weapons complex, I do not agree with the plan's underlying assumptions. Complex Transformation puts far too much emphasis on re-creating the unnecessary capability to research, develop, and manufacture new types of nuclear weapons. The United States still maintains thousands of nuclear weapons and has thousands more in storage -- more than enough to maintain a reliable and credible nuclear deterrent for the foreseeable future. We simply do not need the capability to make more or newer nuclear weapons.

4|14O 5|16A As an inhabitant of Seattle, I consider the nuclear weapons based at Bangor a serious environmental hazard -- safety lapses there in recent years that could have led to radioactive contamination of the Puget Sound area were worrisome to me. Getting rid of nuclear weapons will add to my personal security, and keeping them forever will not.

6|1F Complex Transformation undermines U.S. efforts to stop the spread of nuclear weapons around the world. It violates the spirit and letter of the Comprehensive Test Ban Treaty and sends the wrong message to the world --that obtaining nuclear weapons will increase security.

7|11A Any major upgrade of the nuclear weapons complex must be preceded by a comprehensive analysis and re-evaluation of the role of nuclear weapons as an instrument of security policy. That review needs to be done by the president and the Department of Defense, not the DOE, and Congress has already mandated that the next president undertake one.

8|7J Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE should focus on shrinking the still-oversized nuclear weapons complex and on maintaining the safety and security of our existing weapons arsenal as the size of our nuclear stockpile is reduced.

I ask that you include my comment as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project. Thank you.

Sincerely,
Mary Hanson
4701 38th Ave NE
Seattle, WA 98105

Hanson, Mary
Page 2 of 2

PC_1610

cc:
Senator Patty Murray
Representative Jim McDermott
Senator Maria Cantwell

2

Hanson, Robert
Page 1 of 1

PC_1000

My name is Robert Hanson. I am co-chair of the Mt. Diablo Peace and Justice Center, located in Walnut Creek, CA.

We believe it is time to re-think our country's nuclear posture. Instead of spending billions of dollors on improving our nuclear arsenal, we should be planning for and working toward a nuclear free world.

1|9B

Can anybody in their right mind conceive of any possible scenerios where nuclear weapons could be used against a band of terrorists? That would be like shooting a 12 gauge shotgun into a crowded church to kill a fly or wasp. Even conventional bombs and rockets kill many more civilians than targeted enemy combatants.

We worry about nuclear weapons falling into the hands of terrorists. The best way to prevent that possibility is for the world to eliminate these weapons. If the terrorists ever did get lucky, get a hold of a nuclear bomb, smuggle it into one of our cities and detonate it….what good would our arsenal of thousands of nuclear weapons do us? Who would we retaliate against?

2|13A

George Schultz, Henry Kissinger, Sam Nunn and Bill Perry have called for working toward a world that is free of nuclear weapons. None of these four has a reputation for being a pacifist or "peacenik"….but they understand that nuclear weapons are relics of the cold war with the Soviet Union, which no longer exists. As long as these horrible devices exist, there is danger of an accidental war starting, as it almost did in 1983, when Soviet equipment mal-functioned and only the good judgement of a Colonel Stanislaus Petrov prevented a nuclear holocaust, which would have ended our civilization.

So, folks, let's not waste billions of dollars upgrading our nuclear weapons. Let's lead the way forward to a nuclear weapons free world. Let the billions we save be spent on research which will benefit the world, such as renewable energy, alternative fuels and cures for disease.

1|9B
(cont.)

Transformation…..Yes! New Nukes…..No!

Livermore, CA

Harden, Susan

Page 1 of 1

PC_2120

Levens, Matthew

From: Susan Harden [harden.sue@gmail.com]
Sent: Wednesday, April 30, 2008 10:38 AM
To: Complex2030
Subject: Plutonium Plant

Susan Harden
522 Woodlands Way
Abington, MA 02351-2591

April 30, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|2O I am old enough to have been alive for all the history of nuclear weapons.

1|2O (cont.) I recall, in high school, feeling there was no reason to choose a career because nuclear war would end the possibility of my pursuing any career.
2|16A Fortunately, I am still here after a meaningful career of forty years as a teacher.

3|1F; 4|1J What happened to nonproliferation treaties? How much more menacing a super power does the US need to be in this volatile world? What right do we have to threaten any other nation to delve into nuclear power while we are retooling, updating our cataclismic nuclear weaponry?

5|9B Put the funding into the destruction of all nuclear weapons. That is the only rational and promising use of funds targeted at nuclear weapons.

1|2O (cont.) I am reminded almost daily of President Eisenhower's warning about the military/corporate complex. Clearly our nation turned a deaf ear to his words. We are paying a price, and we are courting disaster.

Sincerely,

Susan P. Harden
650-954-9518

1

Hardie, Anne

Page 1 of 1

PC_1365

Levens, Matthew

From: hardie50@msn.com
Sent: Tuesday, April 08, 2008 8:06 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|16A I could not be more strongly opposed to the DOE plan to produce new nuclear weapons and upgrade the United States nuclear arsenal than I am today. I am appalled that this idea is even being discussed. As an American, I would like to see America lead the way in modeling adherance to the comphrehensive Test Ban Treaty and reducing nuclear weapons.

2|1J Further, any production of new nuclear weapons threatens our national security, as other nations will be compelled than to keep up with us in the nuclear race. I want the United States out of the nuclear arms race, not leading the world in producing more nuclear weapons.

3|1F How ever does the DOE reconcile it's plans with the Comprehensive Test Ban Treaty?

I am adamately opposed to the DEO's plans for producing more nuvclear weapons.

I ask that you include my comment as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project.
Thank you.

Sincerely,
Anne Hardie
702 W. 21st Ave.
Spokane,, WA 99203

cc:
Senator Patty Murray
Representative Cathy McMorris Rodgers
Senator Maria Cantwell

1

Hardin, Stephen

Page 1 of 1

PC_1756

Levens, Matthew

From: hardins@westerntc.edu
Sent: Sunday, April 06, 2008 9:37 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|1F; 2|1J; 3|16A I'm opposed to the development of new nuclear weapons. First of all, we should abide by the nuclear test ban treaty and not test new sorts of nuclear weapons. Secondly, the development of such weapons would send the wrong message to rest of the worldly. Thirdly, such a project should not be undertaken with input and analysis by elected 4|1B government officials. I plead with you to advance our great republic by letting by acknowledging the critical role of democratic process in planning our nation's defense.

Please include my comment as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project. Thank you.

Sincerely,
Stephen Hardin
P O Box 3202
La Crosse,, WI 54602

cc:
Senator Herb Kohl
Senator Russ Feingold
Representative Ron Kind

1

Harling, Nathan

Page 1 of 1

PC_1173

Levens, Matthew

From: nnaatthhaann@sbcglobal.net
Sent: Monday, April 07, 2008 3:15 AM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

What's the point of making new nuclear weapons if our current stockpile already allows us to destroy every city on the planet?

1|3A; 2|16A And why is the Department of Energy making this decision? What is the Department of Defense for if the DoE takes matters like this into its own hands?

I ask that you include my comment as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project. Thank you.

Sincerely,
Nathan Harling
9 San Pablo Ct.
Chico, CA 95973

cc:
Senator Dianne Feinstein
Senator Barbara Boxer
Representative Wally Herger

1

Harmon, Sandy
Page 1 of 1

Mr. Sandy Harmon PC_348- 274
Post Office Box 1666 - Tonopah, NV 89049
(775) 482-5604 ☆ fax - 482-3120 ☆ heysandy@citlink.net

Mr. Theodore A. Wyka
Complex 2030 SEIS Document Manager
Office of Transportation
U S Dept. Of Energy
1000 Independence Ave SW
Washington DC 20585

Dear Mr. Wyka:

I write to make comment on the Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement (DOE/EIS-0236-S4).

For nearly 60 years the United States Government has controlled a large segment of area within Nye county, arguably the 2nd or 3rd largest county in the continental US. The land has not been governed by good stewardship, but by an environmentally destructive program which has made it unusable for any other purpose without spending billions of dollars in remediation.

Further, the surrounding communities have not seen the economic benefit of such a massive government program which other communities near other federal facilities have. In fact, our towns and counties have had to provide services and benefits mandated by any number of federal laws and regulations, without the financial means to do so. Our communities have had much difficulty in meeting onerous federal environmental requirements, water supply requirements and more without a solid tax base to provide a dependable revenue stream because the federal government has controlled - a not paid taxes on - over 90% of our 19,000 square miles. 1|15A

Despite the foregoing, our county and our towns have given much support to the mission of the DOE and DOD over the years, asking for nothing in return but jobs - which are more often given to people living outside the county. Now we are told that what little we have received is going to be taken away. Worse, this land will not be useable within many lifetimes and will continue to be locked away and off our tax rolls.

From strictly an environmental aspect, one must ask the question: How does closing such a large piece of land, which cannot be readily healed, while moving various activities to other, more pristine land benefit the environment? How will the surrounding communities care for their land and air when the little revenue provided through these federal programs is removed, with absolutely no means of replacing it?

From an economic standpoint, I would ask: How does one justify closing a facility which cost billions of dollars to perfect, only to spend even more cleaning it up and billions more than that to move these programs and create new programs in a new location? Where is the savings to taxpayers?

And from a patriotic view, as a veteran and former local elected official, I ask you why, after being treated in this fashion by our representative form of government; would any citizen ever tacitly accept any such federal programs in their back yard ever again?

Very truly yours.

Sandy Harmon, Ed. M., DD

Harold, Brittney
Page 1 of 1

PC_1292

Levens, Matthew

From: Brittney Harold [brittneysummerharold@gmail.com]
Sent: Thursday, April 17, 2008 2:04 PM
To: Complex2030
Subject: Funding nuclear weapons is not a priority!

Brittney Harold
5419 SE 17th Ave
Portland, OR 97202-4905

April 17, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

Last night I watched the Democratic Debate on television with Clinton and Obama trying to spit out ways to cut taxes while still funding programs like health care and social security. I think a lot of solutions might present themselves if we stop paying taxes to fund programs that promote the development of nuclear weapons. Forty three percent of each dollar I pay in taxes is spent on war!! This is unacceptable! I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons. This is not a priority for me or for a lot of people I know! 1|16A

Thank-you for your time.

Sincerely,

Brittney Harold
503-729-2347

1

Harris, Curt
Page 1 of 2

PC_1659

Levens, Matthew

From: oakoaks@sbcglobal.net
Sent: Saturday, April 05, 2008 10:29 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|16A I oppose the Department of Energy's plans for moving forward with their effort to consolidate and reduce the facilities, workforce, and redundant capabilities within the nation's sprawling nuclear weapons complex.

2|3A Additionally, Complex Transformation fails to address the need to re-create the necessary capability to research, develop, and manufacture new types of nuclear weapons. The United States will always have the need to maintain a reliable and credible nuclear stockpile as a deterrent against terrorist aggression for the foreseeable future. We simply will always need the capability to make more or newer nuclear weapons.

Any major upgrade of the nuclear weapons complex must be preceded by a comprehensive analysis and re-evaluation of the role of nuclear weapons as an instrument of security policy.
3|1C That review needs to be done by the president and the Department of Defense in addition to, and acting alongside, the DOE, and Congress has already mandated that the next president undertake one.

In addition to recreating the capacity to produce new, necessary nuclear weapons, the DOE should focus on securing the nuclear weapons complex and on maintaining the safety and security of our existing weapons arsenal as the.

To show the nation that your efforts with safe nuclear energy are sincere, and to bring home to the nation the sincerity of your office's efforts, I ask that you continue with your efforts to move the D-Day National Museum from Louisiana to California, the state where it needs to reside. The mis-use of funding in Louisiana has shown no downward spiral, the honor that such a monument should bestow upon our veterans of that era has not
4|20.0 reached the heights that it should, that it would gain if the museum were in California. I request that your office coordinate its efforts to gain the nuclear technology that your constituents need to live in the security that they deserve, with the effort to move the D-Day/WW II Museum to California, where those veterans who gave their all so that their descendants may live in freedom may also continue to protect us with their memory.

If moving the museum should prove to be difficult, I ask that your office fire Pete Wilson. I would gladly take his job, with your office's support.

I ask that you include my comment as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project.
Thank you.

Sincerely,
Curt Harris
3760 Texas Street
San Diego, CA 92104

cc:
Senator Dianne Feinstein

1

Harris, Curt
Page 2 of 2

Senator Barbara Boxer
Representative Susan Davis

PC_1659

2

Harrison, Claire
Page 1 of 1

APRIL 10, 2008

PC_909

TO:

THEODOR WYKA
COMPLEX TRANSFORMATION
SPEIS DOCUMENT MANAGER
US DEPARMEN OF ENERGY
1000 INDEPENDENCE AVE. SW
WASHINGTON DC, 20585

COMENTS ON COMPLEX TRANSFOR-
MATION SPEIS

1|16A; 2|3A I am opposed to the creation of additional nuclear weapons. We already posess too many. We need to think of the dangers we create for all humanity and future gener-
3|14O ations. NO MORE BOMBS OR OTHER WEAPONS.

(Mrs Richard) Claire Harrison
1860 Sherman Ave #2 SW
EVANSTON, IL 60201

Hart, Mark
Page 1 of 2

PC_270

Mark M. Hart
5883 Felicia Avenue
Livermore, California 94550
925-373-7050

March 17, 2008

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, D.C. 20585

Re: Complex Transformation SPEIS Comments

Dear Mr. Wyka,

Please include the following as part of the Complex Transformation SPEIS Comments.

Site 300
Lawrence Livermore National Laboratory

I write as a concerned citizen and taxpayer. I am a resident of Livermore, California and though I work at Lawrence Livermore National Laboratory (LLNL) you will be reading only my viewpoints. Working at LLNL gives me first hand knowledge and insight that may not be widely known and that I would like to share.

Nuclear weapons, a serious subject..... The safety and reliability of nuclear weapons are extremely serious subjects. The safety is of obvious importance to everyone. The reliability ensures your and my security in this dangerous world. Those countries with nuclear weapons would never dare use them against us.

1|13A; 2|3A; 3|6D.2 (cont.) No thoughtful person can trivialize the subject of nuclear weapons by saying, let's just get rid of them, let's quit refurbishing them, let's not make any new ones to replace the old ones.....

The environmentally sound and secure laboratory facilities at LLNL Site 300 are crucial to maintaining the safety of the warheads and ensuring their reliability.

Hart, Mark
Page 2 of 2

4|15A; 5|10C; 3|6D.2 (cont.)

This is particularly true while we cannot detonate nuclear devices in a test. Site 300 has unparalleled instrumentation and laboratory equipment in diagnosing and answering questions relative to the stockpile, whenever they come up. Site 300 is indispensable in any effort to make safer and more secure nuclear weapons incorporating modern safety and security technology.

Much like you would not want your doctor to practice without at least a clinic nearby with all of its laboratory and diagnostic equipment to ensure your health, you would not want LLNL to ensure the safety and reliability of nuclear weapons without the laboratory and diagnostic equipment of Site 300 nearby.

Thank you for your consideration,

Mark M. Hart

Hart, Mark
Page 1 of 2

PC_1624

Levens, Matthew

From: Jane Hart [jamrk95@comcast.net]
Sent: Saturday, April 05, 2008 9:30 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comment - High Explosive Laboratories, Site 300, LLNL

Complex Transformation SPEIS Comments

High Explosive Laboratories, Site 300
Lawrence Livermore National Laboratory

1|4A; 2|5A

I write as a concerned citizen and taxpayer. I am a resident of Livermore, California and though I work at Lawrence Livermore
National Laboratory (LLNL) you will be reading only my viewpoints.
Working at LLNL gives me first hand knowledge and insight that may not be widely known and that I would like to share.

3|6D.1

It is ill advised to close the high explosive laboratories at Site 300. Let me explain to you why. If I were posed with a question about high explosive performance or safety, within two days I could design an experiment to answer the question. By the end of the week my drafter would have completed the drawings for the experiment.

The high explosive parts could be pressed and machined in the laboratories in the Site 300 laboratories by the third week. During the fourth week the experiment is assembled, and on the fifth week the experiment is shot at one of the laboratories at Site 300.

Six weeks after being asked to resolve a question, I would have the data on my desk. This might sound like a long time to you, but you haven't heard anything yet.

1|4A (cont.); 2|5A (cont.)

It has been proposed that the high explosive laboratories at Site 300 be closed and that work be done elsewhere. One suggestion is that a commercial high explosives plant perform the laboratory fabrication that I described above. These companies typically fulfill contracts for manufacturing tons of explosives and are not geared to make my experiment using only pounds of explosive. Commercial mass production plants would not be geared to take the special care in manufacturing my experiment parts and taking all of the samples, densities, and specific measurements required to validate the necessary characteristics of my explosive parts. I couldn't possibly generate enough business for them to pay attention to my special requests, making this whole process problematic and more likely to fail than succeed.

It has also been suggested that the DOE Pantex Production Plant in Amarillo, Texas do Site 300's laboratory fabrication work and experiments. Site 300's laboratories are located in some remote hills, a few miles from LLNL. Like large commercial explosive plants, Pantex is also a production plant that receives its award fees based in part upon the assembly and disassembly of nuclear warheads. Since the Pantex plant is not contractually required to respond to my requests and my little experiment is not on Pantex's award fee schedule, it would be ignored and not done.

It has been proposed by people who know how the system operates that I would have to travel to Washington to convince people of the importance of my little experiment. Assuming that I was successful in this endeavor, DOE Headquarters would then place the fabrication of the high explosive, assembly of the experiment and shooting the experiment on Pantex's award fee schedule for the next fiscal year.
In the next fiscal year Pantex would carry out the work to meet its contractual requirements and obtain its award fee.

Depending on the timing, it could take up to 2 years to complete the experiment and have data arrive on my desk – versus six weeks using Site 300.

Alternatively, it has been proposed that as part of Pantex's contract with the Department of Energy and as part of their award fee, they set up and set aside a group of managers, administrators, scientists, engineers, and technicians and machine shops dedicated to take

Hart, Mark
Page 2 of 2

PC_624

experiments such as mine and complete them on a timely basis. This means setting up the capabilities and responsiveness of Site 300 at the Pantex Plant in Amarillo, Texas. The very same collection of skills, personnel, and equipment dedicated to conducting experiments with no obvious cost savings. Actually, there will be an increase in cost and reduced efficiency and responsiveness because of an additional cadre of people that will have to be set up at Pantex and
LLNL to coordinate the logistics and activities at both locations.
This is accompanied by the inevitable increase in difficultly in getting the work done, the increased time and expense of conducting operations over 1000 miles away compared to a short 45 minute car ride to Site 300.

4|9C

Separating scientists from their laboratories doesn't make sense from the standpoint of the increased cost, reduced efficiency, and reduced responsiveness. You would no more want to take the laboratories away from scientists than you would want to take hospitals or clinics away from doctors.

Thank you for your consideration,

Mark M. Hart

2

Hart, Mark
Page 1 of 2

Mark M Hart
5883 Felicia Avenue
Livermore, California 94550
925-373-7050

PC_267

March 19, 2008

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, D.C. 20585

Re: Complex Transformation SPEIS Comments

Dear Mr. Wyka,

Please include the following as part of the Complex Transformation SPEIS Comments.

Contained Firing Facility, Site 300
Lawrence Livermore National Laboratory

I write as a concerned citizen and taxpayer. I am a resident of Livermore, California and though I work at Lawrence Livermore National Laboratory (LLNL) you will be reading only my viewpoints. Working at LLNL gives me first hand knowledge and insight that may not be widely known and that I would like to share.

1|10C

2|14A

3|9A

I am concerned about specific NNSA plans for Complex Transformation Supplemental Programmatic Environmental Impact Statement (SPEIS) and specifically the plan to close the Contained Firing Facility at Site 300. The Contained Firing Facility was built in 2002 at a cost to the taxpayer of 50 million dollars. The Contained Firing Facility was designed with a life of 25 years. It has been built and operated so well that it now has an indefinite lifetime. Six years after being built, would it make sense to close it down? Implementing this plan could constitute a very grave error.

It is irresponsible to prematurely close down the Contained Firing Facility at Site 300 after 50 million dollars has been spent to build it. It is up and running, and is functioning very well. It would be wasteful to close it down after only 6 years of

Hart, Mark
Page 2 of 2

Page 2

operation. This would constitute arbitrarily throwing away millions of taxpayer dollars.

It doesn't make sense to move this environmentally sound and secure explosive laboratory, away from the scientists who need the laboratory to provide crucial and timely answers to questions that come up about our ever-aging nuclear weapons.

1|10C (cont.)

It doesn't make sense to close down perfectly functioning facilities without anything that is operating to take its place. The people who know how to conduct this very specialized work will move on to other work. The knowledge on how to do this research will be lost. No other location including the Los Alamos National Laboratory, Nevada Test Site, or commercial explosive operation can begin to match what the Contained Firing Facility can do.

2|14A (cont)

3|9A (cont)

It is inescapable to deduce that closing the Contained Firing Facility is irresponsible, illogical, and pushes us closer to the need for nuclear tests. This is because there will be no other way to answer questions that come up about our ever-aging nuclear weapons.

Applying logic, common sense, and responsible stewardship of the nuclear weapon stockpile justifies applying the relatively small amount of funds required to keep the Contained Firing Facility open. It is also imperative that we ensure that the Contained Firing Facility is continually modernized so that we can get correct and timely answers to questions about the nuclear weapon stockpile as it continues to get older.

Thank you for your consideration,

Mark M. Hart

Hart, Mark
Page 1 of 2

Mark M. Ha t
5883 Felicia Avenue
Livermore, California 94550
925-373-7050

PC_270

March 17, 2008

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, D.C. 20585

Re: Complex Transformation SPEIS Comments

Dear Mr. Wyka,

Please include the following as part of the Complex Transformation SPEIS Comments.

Site 300
Lawrence Livermore National Laboratory

I write as a concerned citizen and taxpayer. I am a resident of Livermore, California and though I work at Lawrence Livermore National Laboratory (LLNL) you will be reading only my viewpoints. Working at LLNL gives me first hand knowledge and insight that may not be widely known and that I would like to share.

Nuclear weapons, a serious subject..... The safety and reliability of nuclear weapons are extremely serious subjects. The safety is of obvious importance to everyone. The reliability ensures your and my security in this dangerous world. Those countries with nuclear weapons would never dare use them against us.

1|13A; 2|3A; 3|6D.2 (cont.)

No thoughtful person can trivialize the subject of nuclear weapons by saying, let's just get rid of them, let's quit refurbishing them, let's not make any new ones to replace the old ones.....

The environmentally sound and secure laboratory facilities at LLNL Site 300 are crucial to maintaining the safety of the warheads and ensuring their reliability.

Hart, Mark
Page 2 of 2

Page 2

This is particularly true while we cannot detonate nuclear devices in a test. Site 300 has unparalleled instrumentation and laboratory equipment in diagnosing and answering questions relative to the stockpile, whenever they come up. Site 300 is indispensable in any effort to make safer and more secure nuclear weapons incorporating modern safety and security technology.

4|15A; 5|10C; 3|6D.2 (cont.)

Much like you would not want your doctor to practice without at least a clinic nearby with all of its laboratory and diagnostic equipment to ensure your health, you would not want LLNL to ensure the safety and reliability of nuclear weapons without the laboratory and diagnostic equipment of Site 300 nearby.

Thank you for your consideration,

Mark M. Hart

Hart, Mark
Page 1 of 2

PC_1624

Levens, Matthew

From: Jane Hart [jamrk95@comcast.net]
Sent: Saturday, April 05, 2008 9:30 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comment - High Explosive Laboratories, Site 300, LLNL

Complex Transformation SPEIS Comments

High Explosive Laboratories, Site 300
Lawrence Livermore National Laboratory

1|4A; 2|5A I write as a concerned citizen and taxpayer. I am a resident of Livermore, California and though I work at Lawrence Livermore National Laboratory (LLNL) you will be reading only my viewpoints. Working at LLNL gives me first hand knowledge and insight that may not be widely known and that I would like to share.

3|6D.1 It is ill advised to close the high explosive laboratories at Site 300. Let me explain to you why. If I were posed with a question about high explosive performance or safety, within two days I could design an experiment to answer the question. By the end of the week my drafter would have completed the drawings for the experiment.

The high explosive parts could be pressed and machined in the laboratories in the Site 300 laboratories by the third week. During the fourth week the experiment is assembled, and on the fifth week the experiment is shot at one of the laboratories at Site 300.

Six weeks after being asked to resolve a question, I would have the data on my desk. This might sound like a long time to you, but you haven't heard anything yet.

1|4A (cont.); 2|5A (cont.) It has been proposed that the high explosive laboratories at Site 300 be closed and that work be done elsewhere. One suggestion is that a commercial high explosives plant perform the laboratory fabrication that I described above. These companies typically fulfill contracts for manufacturing tons of explosives and are not geared to make my experiment using only pounds of explosive. Commercial mass production plants would not be geared to take the special care in manufacturing my experiment parts and taking all of the samples, densities, and specific measurements required to validate the necessary characteristics of my explosive parts. I couldn't possibly generate enough business for them to pay attention to my special requests, making this whole process problematic and more likely to fail than succeed.

It has also been suggested that the DOE Pantex Production Plant in Amarillo, Texas do Site 300's laboratory fabrication work and experiments. Site 300's laboratories are located in some remote hills, a few miles from LLNL. Like large commercial explosive plants, Pantex is also a production plant that receives its award fees based in part upon the assembly and disassembly of nuclear warheads. Since the Pantex plant is not contractually required to respond to my requests and my little experiment is not on Pantex's award fee schedule, it would be ignored and not done.

It has been proposed by people who know how the system operates that I would have to travel to Washington to convince people of the importance of my little experiment. Assuming that I was successful in this endeavor, DOE Headquarters would then place the fabrication of the high explosive, assembly of the experiment and shooting the experiment on Pantex's award fee schedule for the next fiscal year. In the next fiscal year Pantex would carry out the work to meet its contractual requirements and obtain its award fee.

Depending on the timing, it could take up to 2 years to complete the experiment and have data arrive on my desk – versus six weeks using Site 300.

Alternatively, it has been proposed that as part of Pantex's contract with the Department of Energy and as part of their award fee, they set up and set aside a group of managers, administrators, scientists, engineers, and technicians and machine shops dedicated to take

1

Hart, Mark
Page 2 of 2

PC_624

experiments such as mine and complete them on a timely basis. This means setting up the capabilities and responsiveness of Site 300 at the Pantex Plant in Amarillo, Texas. The very same collection of skills, personnel, and equipment dedicated to conducting experiments with no obvious cost savings. Actually, there will be an increase in cost and reduced efficiency and responsiveness because of an additional cadre of people that will have to be set up at Pantex and
LLNL to coordinate the logistics and activities at both locations.
This is accompanied by the inevitable increase in difficultly in getting the work done, the increased time and expense of conducting operations over 1000 miles away compared to a short 45 minute car ride to Site 300.

4|9C

Separating scientists from their laboratories doesn't make sense from the standpoint of the increased cost, reduced efficiency, and reduced responsiveness. You would no more want to take the laboratories away from scientists than you would want to take hospitals or clinics away from doctors.

Thank you for your consideration,

Mark M. Hart

2

Hart, Mark
Page 1 of 2

PC_270

Mark M. Hart
5883 Felicia Avenue
Livermore, California 94550
925-373-7050

March 17, 2008

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, D.C. 20585

Re: Complex Transformation SPEIS Comments

Dear Mr. Wyka,

Please include the following as part of the Complex Transformation SPEIS Comments.

Site 300
Lawrence Livermore National Laboratory

I write as a concerned citizen and taxpayer. I am a resident of Livermore, California and though I work at Lawrence Livermore National Laboratory (LLNL) you will be reading only my viewpoints. Working at LLNL gives me first hand knowledge and insight that may not be widely known and that I would like to share.

Nuclear weapons, a serious subject..... The safety and reliability of nuclear weapons are extremely serious subjects. The safety is of obvious importance to everyone. The reliability ensures your and my security in this dangerous world. Those countries with nuclear weapons would never dare use them against us.

No thoughtful person can trivialize the subject of nuclear weapons by saying, let's just get rid of them, let's quit refurbishing them, let's not make any new ones to replace the old ones.....

1|13A;
2|3A;
3|6D.2
(cont.)

The environmentally sound and secure laboratory facilities at LLNL Site 300 are crucial to maintaining the safety of the warheads and ensuring their reliability.

Hart, Mark
Page 2 of 2

Page 2

This is particularly true while we cannot detonate nuclear devices in a test. Site 300 has unparalleled instrumentation and laboratory equipment in diagnosing and answering questions relative to the stockpile, whenever they come up. Site 300 is indispensable in any effort to make safer and more secure nuclear weapons incorporating modern safety and security technology. 4|15A; 5|10C; 3|6D.2 (cont.)

Much like you would not want your doctor to practice without at least a clinic nearby with all of its laboratory and diagnostic equipment to ensure your health, you would not want LLNL to ensure the safety and reliability of nuclear weapons without the laboratory and diagnostic equipment of Site 300 nearby.

Thank you for your consideration,

Mark M. Hart

Hart, Mark
Page 1 of 1

PC_1094

Levens, Matthew

From: Jane Hart [jamrk95@comcast.net]
Sent: Monday, April 07, 2008 2:23 AM
To: Complex2030
Subject: Complex Transformation SPEIS Comment - Plutonium and High Explosive Labs, LLNL

Complex Transformation SPEIS Comments

Plutonium and High Explosive Laboratories Lawrence Livermore National Laboratory

1|10C I write as a concerned citizen and taxpayer. I am a resident of Livermore, California and though I work at Lawrence Livermore National Laboratory (LLNL) you will be reading only my viewpoints. Working at LLNL gives me first hand knowledge and insight that may not be widely known and that I would like to share.

1|10C (cont) 2|7M It doesn't make sense, nor is it logical to close down the environmentally safe and sound plutonium and high explosive laboratories at the Lawrence Livermore National Laboratory. The need for these laboratories continues to exist, and if closed down, money will have to be spent to build new ones somewhere else. Since the taxpayer has already paid the bill, it certainly doesn't seem reasonable to charge the taxpayer again. Also, why close these laboratories and take them away from the scientists and engineers who need them to answer questions important to our national security?

3|13A While there are special interest groups that pressure the Department of Energy to close these laboratories, these are special interest groups that also promote the view that the United States should eliminate all of it nuclear defenses even if all other countries keep theirs. Such logic certainly defies common sense and promotes a way of thinking that would jeopardize our collective safety and national security. There is an undeniable parallel in logic.

4|1F 5|1J Just as soon as the United States has negotiated the complete elimination of nuclear weapons with all other countries possessing nuclear weapons and verified that they no longer exist, we can close down these laboratories or convert them to other uses.

6|3A Until then, the United States government has the obligation and responsibility to its citizens and allies around the world to maintain the safety and reliability of the ever-aging nuclear weapons. That is what these plutonium and high explosive laboratories were built and designed for. Separating the LLNL scientists and engineers from these laboratories only makes meeting this national responsibility increasingly cumbersome, inefficient and inevitably more costly.

Scientific institutions, designed to get the job done, always have their laboratories nearby. It only makes common sense. Constructing new laboratories located remotely from the scientists and engineers who need them cannot be anticipated to reduce costs or increase effectiveness, and will come with a great loss in capability and responsiveness to the national need.

Thank you for your consideration,

Mark M. Hart

1

Hartman, Michael

Page 1 of 1

PC_304

CHARTER
Bank • Mortgage • Insurance

March 18, 2008

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy-NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Wyka:

1|7N
2|15A
This letter is in support of the Preferred Alternative in the Draft Complex Transformation SPEIS, as it relates to Los Alamos National Laboratory.

As a Business Banker living and working in Santa Fe for over a decade, I am aware of LANL's long history of contributions, not only to national security efforts but to general scientific advancements. LANL has proven to be a valuable national asset and I believe we should continue to support the important and critical work that takes place there. Many breakthroughs in healthcare, energy development and biosciences are the direct result of the work done at the Lab. I have seen several examples of technology transfer beneficially impact the citizens of this country.

2|15A
(cont.)

In addition, LANL has tremendous positive impacts on northern New Mexico. Not only does the payroll exceed $1 billion a year, but they purchase over $400 million worth of goods and services annually from New Mexico companies. They are supporters of local communities, hosting over 1,200 student internships, donating to local charities and providing funding and equipment to New Mexico schools.

LANL's economic and scientific contribution to our community has been valuable. I am glad to support the SPEIS

Sincerely,

Michael Hartman
Senior Vice President

208 Washington Avenue Santa Fe, New Mexico 87501 505-946-6555

Hartsough, David

Page 1 of 1

PC_288

PEACEWORKERS
721 Shrader St.
San Francisco, CA 94117

Mr. Theodore Wyka,
Complex Transformation SPEIS Document Manager,
Office of Transformation, NA-10.1, U.S. Department of Energy/NNSA
1000 Independence Avenue, SW. Washington, D.C. 20585

Dear Theodore Wyka,

1|16A
I write to speak against the Complex Transformation at Livermore Labs and a planned future for continued research, development and production of nuclear weapons.

2|13A.1
3|1J
Our only security is NOT in developing a new generation of nuclear weapons, but in keeping our commitment to an international treaty to work for the abolition of all nuclear weapons by all nations. No less hawkish statesmen than former Senator Sam Nunn and Henry Kissinger have said our best security is in working for the abolition of all nuclear weapons by all states.

3|1J
(cont)
It is a terrible double standard for the US to continue developing new nuclear weapons and keep our massive arsenal of nuclear weapons while we say other nations have no right to develop nuclear weapons. And it will NOT work!

I encourage you to LISTEN to Sam Nunn and Henry Kissinger and totally phase out Livermore Labs, Los Alamos labs and the Nevada Test Site from any work on nuclear weapons development and work instead for the abolition of all nuclear weapons from the face of the earth.

4|7A
The great minds working on nuclear weapons could much more productively work on developing new renewable energy technologies. They could even feel good about our work and all of us in the Bay area could feel good about the work at the Labs.
Thanks for listening to this prayerful request.

Sincerely,

David Hartsough
Executive Director

Hartung, Lynn
Page 1 of 2

Feb 15 08 05:02p Lynn Hartung, MA, L.P.C. 12486810018 p.1

PC_12

February 15, 2006

Lynn Hartung
3846 Chenlot Drive
Waterford, MI 48328

Theodore Wyka
Complex Transformation SPIES Document Mgr.
U.S. Department of Energy
1000 Independence Ave S.W.
Washington D.C. 20585

Mr. Wyka:

1|1F
2|16A
3|1E
I am writing you this letter to express my concern and outrage that the United States continues to break the Non-Proliferation Treaty by not pursuing disarmament. The Complex Transformation project, which promotes an on-going nuclear arsenal and the nuclear stockpile life extension program, should not be implemented in any size, shape or form. Instead, the United States should rise to meet all of its obligations under the Nonproliferation Treaty, which is to not build or test any new nuclear weapons, not do anything that might promote an arms race and pursue nuclear disarmament at the earliest date possible.

4|20
I certainly do not stand alone in my belief that nuclear weapons are wrong and should be completely eliminated. Other supporters of nuclear abolition include: The former President Jimmy Carter, 34 Nobel laureates, 115 political leader from 46 nations, 61 retired general and admirals from 17 countries (18 were from Russia and 17 were from the US). In addition, **the former Commander of U.S. Strategic Air Command, General George Lee Butler stated, "...nuclear weapons are inherently dangerous, hugely expensive, militarily inefficient and morally indefensible."**

5|9B
More than $12 trillion has so far been spent on these instruments of mass murder, which is a theft from the poorest people in the world. It staggers the imagination to consider what the enormous sums spent on nuclear weapons could have done for education, health, and other requisites for the development of peoples everywhere.

In 2005, the United States spent $110 million *every day* on the maintenance of its nuclear forces. Unfortunately, the present nuclear weapons crisis has, in fact, led to the opening of the Second Nuclear Age. This is driving world military spending, which exceeded $1 trillion in 2004, which in just two years was a 20 percent increase from 2002.

6|1J
7|1L
Getting all nations to agree to a stronger nonproliferation regime will require skillful diplomacy and new thinking. Nuclear states must stop making new weapons and must reduce the size of their existing arsenals. The Non-Proliferation Treaty, which the United States signed, commits the United States to the goal of nuclear disarmament. To get other countries to follow the NPT, we too must follow the NPT commitment to nuclear disarmament.

Hartung, Lynn
Page 2 of 2

Feb 15 08 05:03p Lynn Hartung, MA, L.P.C. 12486810018 p.2

Let me end with a quote by the Honorable Douglas Roche, O.C. in an Address to U.S. Catholic Bishops' Panel on "Ethics, Policy and the Proliferation of WMD."

2|16A (cont)
Nuclear weapons are instruments of pure evil. A nuclear explosion, either by design or accident, would kill massive numbers of people, create international chaos, and cripple the world economy. Nuclear weapons are devoid of the slightest shred of moral legitimacy. Prominent jurists consider their use illegal in any possible circumstance. The nuclear weapons states are deliberately undermining the rule of law in maintaining them.

Sincerely,

Lynn Hartung

Hartung, William
Page 1 of 4

PC_1038

BAILING OUT THE NUCLEAR WEAPONS INDUSTRY – THE REAL PURPOSE OF COMPLEX TRANSFORMATION?

Summary Comments by William D. Hartung, Director, Arms and Security Initiative, New America Foundation

At Hearings on the Department of Energy/National Nuclear Security Administration's Draft Supplemental Programmatic Environmental Impact Statement (SPEIS) on Plans to Modernize the Nuclear Weapons Complex ("Complex Transformation")

Washington, DC, March 25, 2008

INTRODUCTION AND SUMMARY:

1|9H **THIS PLAN IS PROVOCATIVE, PREMATURE, AND UNNECESSARY -- NOT TO MENTION A MASSIVE WASTE OF TAXPAYER DOLLARS**

2|1J • **IT IS PROVOCATIVE BECAUSE IT WILL SPUR NUCLEAR PROLIFERATION**

3|1C • **IT IS PREMATURE BECAUSE THE DECISION ON HOW AND WHETHER TO PROCEED SHOULD BE MADE BY THE NEXT PRESIDENT, WHO IS LIKELY TO REVISE THE CURRENT U.S. NUCLEAR POSTURE**

4|3A • **IT IS UNNECESSARY BECAUSE THERE IS NO TECHNICAL OR STRATEGIC REASON TO BE BUILDING NEW NUCLEAR WEAPONS OR WEAPONS FACTORIES AT THIS POINT IN OUR HISTORY**

5|9B • **AND IT IS WASTEFUL BECAUSE THE DOE's OWN ANALYSIS SUGGESTS THAT ANY OF THE COMPLEX TRANSFORMATION OPTIONS UNDER CONSIDERATION WILL COST OVER $200 BILLION BETWEEN NOW AND 2030 -- FUNDS THAT COULD BE FAR BETTER USED FOR OTHER PURPOSES**

In the remainder of this statement, I will deal with each of these points in turn.

1

washington, DC

Hartung, William
Page 2 of 4

PROVOCATIVE

- **Former Secretaries of State George Shultz and Henry Kissinger, former Secretary of Defense William Perry and former Senate Armed Services Committee chairman Sam Nunn are at the front of a growing line of distinguished former government officials calling for "a world free of nuclear weapons." Two of the three remaining presidential candidates have also called for elimination or deep cuts (Obama and Clinton). So why isn't this option considered in the draft SPEIS?**

- **The NNSA claims that it is only investigating "existing and reasonably foreseeable national security requirements." Or, as the full quotation from Chapter 2 of the SPEIS puts it:**

"The fundamental principle underlying NNSA's evaluation of alternatives is that the SSP must continue to support existing and reasonably foreseeable national security requirements. This is NNSA's obligation and responsibility under the *Atomic Energy Act* and the *National Nuclear Security Administration Act*. This SPEIS does not analyze alternatives to the United States' national security policy. Rather, it examines the environmental effects of proposed actions and reasonable alternatives for execution of the program based on the existing policy and foreseeable changes in this policy."

6|5B • **This raises the obvious question: WHAT IS a reasonable alternative? Isn't it reasonable to consider, both in this SPEIS and at the highest levels of the federal government, how and why proceeding with the production of new nuclear weapons and new nuclear weapons factories is likely to provoke other countries to begin or accelerate efforts to seek their own nuclear arsenals? Isn't the possibility of spurring nuclear proliferation an impact that MUST be considered before going forward with this plan?**

7|13A.1 • **Furthermore, as the advocates of eliminating nuclear weapons have noted, in a world in which terrorists getting their hands on a nuclear weapon may be the greatest threat we face, won't we be MUCH safer with as few nuclear weapons and the smallest amount of bomb-making materials possible? In short, isn't looking at the**

2

Hartung, William
Page 3 of 4

prospects of deep reductions or elimination of nuclear weapons the most reasonable alternative of all?

PREMATURE

- Doesn't the fact that we are on the verge of a new administration that could well decide to move towards a posture of zero nuclear weapons constitute a "reasonable alternative" that should be explored in the SPEIS? In fact, isn't it reasonable to wait for guidance from the next president rather than rushing ahead with a plan that may be rendered irrelevant and obsolete in a few years time? 3|1C (cont)

UNNECESSARY

- A second major argument for building new nuclear weapons and new nuclear weapons facilities is that we need to do so to maintain a safe and reliable stockpile. This argument has been undercut by a 2007 by the well-regarded Pentagon advisory group JASON, which found that the current plutonium "pits" – the devices that trigger the explosion of a nuclear warhead – will be reliable for 100 years or more. Or, in the words of the JASON report "the primaries of most weapons system types in the stockpile have credible minimum lifetimes in excess of 100 years . . . and the intrinsic lifetime of Pu [plutonium] in pits is greater than a century. 8|5C.1

WASTEFUL

- The DOE and NNSA have the audacity to claim that building new nuclear weapons and bomb-making facilities will SAVE money. I guess that depends on what you mean by the word "save." 9|9C
- DOE's own economic consultants suggest that there will be at a minimum $40 to $60 billion in additional investments needed for "Complex Transformation." On top of the ongoing operating costs for

3

Hartung, William
Page 4 of 4

the complex of $170 billion between now and 2030, that would put the price tag at $210 to $230 billion.

- As for offsetting "savings" from a more "efficient" nuclear weapons complex, the DOE's consultants acknowledge that these are unlikely to have a major impact until 2060, or more than 50 years from now, if then. By then, we shouldn't be deploying or building nuclear weapons – they should have long since been eliminated. 9|9C (cont)
- To the extent that it is necessary to maintain a small arsenal for some time into the future, the most effective and least costly option is the "curatorship" approach outlined by Dr. Robert Civiak in a report for Tri-Valley Cares. As Dr. Civiak notes, his plan is "based upon reliance on the surveillance and nonnuclear testing program to determine when repairs are necessary." This would ensure reliability by not introducing new designs or new features that have not been tested. Weapons design, development and experimentation would largely be eliminated under curatorship, while standby production capabilities would be maintained. Under a curatorship approach, Dr. Civiak estimates that "NNSA could reduce its R&D spending by $1.2 billion and reduce total spending on nuclear weapons by $2 billion in the first year after adopting the Curatorship approach. The savings would be larger in later years." 10|9A

A BAILOUT OF THE NUCLEAR WEAPONS INDUSTRY

- Complex Transformation represents a bailout for a nuclear weapons industry that is increasingly irrelevant to the emerging threats that we face as nation and as a global community. The funds proposed for building a new nuclear weapons complex would be far better spent addressing threats like the need to clean up the environmental hazards caused by past nuclear weapons production; finding new technologies and processes for verifying a world of "zero nuclear weapons"; and investing in dealing with overarching threats like climate change. By comparison, wasting funds on sustaining a provocative and unnecessary nuclear weapons complex is an unacceptable use of the money supplied to our government by American taxpayers. 5|9B (cont)

4

Harvey, Phyllis
Page 1 of 1

PC_926

1745 Edna Way
215
Modesto, Ca 95350

Mr. Ted Wyka
N.A.-10.1 U.S. DOE
National Nuclear Security Administration

Dear Sir:

1|16A
2|1F
We do not need/want new nuclear weapons, to add to the "weapons of mass destruction" We must honor the Nuclear Non-Proliferation Treaty, and its article VI disarmament obligation.

3|2E
Extend the deadline and consider these comments!

I oppose the "Bombplex". No more nuclear weapons and pollution.

Yes to a new future!!

Sincerely,

Phyllis Harvey

PC_514

Buenaflor, Justin

From: Jan Harwood [jahn@cruzio.com]
Sent: Wednesday, March 12, 2008 4:40 PM
To: Complex2030
Subject: No Nuclear Weapons

Jan Harwood
312 Elm St
Santa Cruz, CA 95060-4317

March 12, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A
Nuclear weapons continue to be the most dangerous, and most imminently lethal, of all armaments. The only answer to creating a future of any kind for our planet, and the living things upon it, is complete ending of all existing and future nuclear weapons.

I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

I understand that the Chemistry and Metallurgy Research Replacement (CMRR) project would be able to produce 50 to 80 plutonium pits annually, the first major nuclear warhead production since the end of the Cold War.

2|1J
Building this new plant would send a contradictory message to other countries, such as Iran, who may be seeking nuclear weapons. While the U.S. is asking others to forego developing nuclear arsenals, we are simultaneously trying to increase our own capacity to build new nuclear weapons.

Sincerely,

Janice Horne Harwood
831 471-9992

1

Haskell, Doris
Page 1 of 1

PC_924 April 17, 2008

Dear Ted Wyka:

1|16A
2|3A
3|1F
We do not need new nuclear weapons. For our future safety they must be abolished. Please honor the nuclear Non Proliferation Treaty & its Article VI disarmament obligation.

4|2E
Also please extend the comment deadline beyond April 10 to consider my comment & others you may receive.

Thank you.

Truly yours,
Doris Haskell

Doris Haskell
320 Avila Court
Stockton, CA 95210
(209) 477-5166

Haslam, Bill
Page 1 of 1

PC_174

CITY OF OAK RIDGE
CITY OF KNOXVILLE
CITY OF CLINTON
TOWN OF FARRAGUT
CITY OF KINGSTON
TENNESSEE

February 25, 2008

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Wyka:

We are writing in support of the Y-12 National Security Complex and its important mission within the National Nuclear Security Administration's (NNSA) Nuclear Weapons Complex.

1|10I
2|15A
The Y-12 National Security Complex has played an integral role in national and international security since its construction. As elected officials in the Oak Ridge/Knoxville region, our constituents comprise the majority of the Y-12 workforce, whose capability and expertise cannot be duplicated anywhere in the world.

3|5C
4|7N
The recently issued document entitled *The Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement* (SPEIS) presents several alternatives that are under consideration. The NNSA's preferred alternative is to establish "Distributed Centers of Excellence," which would support the continued, specialized uranium mission at Y-12 and allow the design for a new Uranium Processing Facility to proceed. We wholeheartedly support this alternative as it recognizes Y-12's unique capabilities while providing for a smaller, more secure site comprised of several, more efficient facilities.

5|2C
4|7N
(cont)
We commend the NNSA for its efforts to engage the public in the plan to transform the Nuclear Weapons Complex into a safer, more cost-effective 21st Century institution. In this era of post-Cold War challenges, the United States can ill afford the loss of the significant national security investments made in Oak Ridge, Tennessee. We urge the NNSA to implement the preferred alternative, which we believe will provide a strong framework for national security into the foreseeable future.

Mayor Tom Beehan
City of Oak Ridge

Mayor Bill Haslam
City of Knoxville

Mayor Winfred Shoopman
City of Clinton

Mayor Eddy Ford
Town of Farragut

Mayor Troy Beets
City of Kingston

Hassberg, Jeannette
Page 1 of 1

PC_1768

Levens, Matthew

From: Jeannette Hassberg [sistajean52@yahoo.com]
Sent: Friday, March 28, 2008 7:42 PM
To: Complex2030
Subject: Stop the DOE's plans for producng new nukes!

Jeannette Hasseberg
52 Majestic Avenue
San Francisco, CA 94112-3110

March 28, 2008

Complex Transformation

Dear Complex Transformation:

1|16A I am thoroughly opposed to the "transformation"plans of the D.O.E., which amount to modifying nuclear facilities across the country. Nuclear energy is neither clean nor safe, and the "dual use" factor of the nuclear materials enrichment and refinement process is a feature which would make it easier for the U.S. to rebuild its nuclear arsenal. Our aim should be to reduce the stockpile of weapons and encourage this behavior worldwide, and simultaneously seek renewable, benign sources of power. Please act to appropriately address the international tension which the U.S. has already aroused by

2|1J applying an irrational double standard to nuclear energy policy on the world stage. Please insist that we abide by the NNPT and work toward international abolition. And

3|0B finally, please act as a prudent guardian of what is left of the national treasure. I think we should spend the billions proposed for this plan on another very necessary "transformation" policy, of fossil fuels to clean, green solutions, or even better on programs to eliminate nuclear weapons entirely.

Sincerely,

Jeannette Hassberg

Hassberg, Jeannette
Page 1 of 1

PC_1860

Levens, Matthew

From: sistajean52@yahoo.com
Sent: Sunday, April 06, 2008 4:09 AM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|16A If the Department of Energy is moving forward with plans to consolidate and reduce the redundant capabilities within the nation's sprawling nuclear weapons complex, the reduction should be absolute.
"Complex Transformation" still puts much mistaken emphasis on re-creating a capability to research, develop, and manufacture new types of nuclear weapons.
The United States maintains thousands of deadly nuclear weapons and has thousands more in storage. This is more than enough to maintain a reliable and credible nuclear deterrent for the foreseeable future. We absolutely do not need the capability to make more or newer nuclear weapons.

2|1F Furthermore, Complex Transformation negates U.S. efforts to discourage the worldwide proliferation of nuclear weapons, and it violates the spirit and letter of the Comprehensive Test Ban Treaty by sending a message to the world, by obtaining nuclear weapons one will increase ones security.

3|1K The nuclear weapons complex renewal should be preceded by a comprehensive analysis and evaluation of the role of nuclear weapons as an instrument of security policy, to be done by the president and the Department of Defense, not the DOE. Congress has already mandated that the next president undertake such a review.

1|16A (cont.) Instead of producing unnecessary nuclear weapons, the DOE should focus on shrinking the oversized nuclear weapons complex and maintaining the safety and security of our existing arsenal as the size of our nuclear stockpile is reduced.

I ask that you include my comment as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project.
Thank you.

Sincerely,
Jeannette Hassberg
52 Majestic Avenue
San Francisco, CA 94112

cc:
Senator Dianne Feinstein
Senator Barbara Boxer
Representative Nancy Pelosi

1

Havermeyer, Sarai
Page 1 of 1

PC_1218

Levens, Matthew

From: Sarai Havemeyer [s_havemeyer@yahoo.com]
Sent: Thursday, March 27, 2008 2:43 PM
To: Complex2030
Subject: Reject "Complex Transformation' plan to build nuclear weapons

Sarai Havemeyer
863 Litchfield Ave.
Sebastopol, CA 95472-4413

March 27, 2008

Theodore A Wyka
Complex 2030 SEIS Document Manager
Office of Transformation, U.S. Department of Energy, NA-10.1 1000 Independence Avenue, SW.
Washington, DC 20585

Dear Theodore Wyka:

1|16A The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal.

1|16A (cont.) Nuclear Weapons need to be taken off the earth completely!!! They will bring NO GOOD EVER!!! Nothing positive will ever come out of the use of a nuclear weapon. If we want to destroy the world, then we should continue down the path we are on. If we actually want to live and be on this earth for a while, Nuclear weapons have no place or purpose.

2|1J By building up its nuclear arsenal right now, the US is essentially telling the world, "Do as I say, not as I do."

Sincerely,

Sarai

Hayes, Gina
Page 1 of 1

PC_751

Levens, Matthew

From: Sugaralt@aol.com
Sent: Thursday, March 20, 2008 2:42 AM
To: Complex2030
Subject: Nuclear testing in Tracy and Livermore California

1|10C 2|16A I am opposed to any testing in the Tracy/Livermore area as well as the building of any new testing facilities. This area has become heavily populated and to continue this type of testing is to court disaster. The testing and all associated facilities should be moved out of the area immediately.

Gina A. Hayes
Tracy Resident

**********Create a Home Theater Like the Pros. Watch the video on AOL Home.
(http://home.aol.com/diy/home-improvement-eric-stromer?video=15?ncid=aolhom00030000000001)

1

Haynes, Junelia
Page 1 of 1

PC_1119

Levens, Matthew

From: junella haynes [jhredbird@zianet.com]
Sent: Monday, April 07, 2008 10:37 AM
To: Complex2030
Subject: Draft Complex Transformation SDPEIS Comments

1|16A; 2|9B; 3|14O | I oppose the DOE's Bombplex because the U.S. does not need new nuclear weapons, especially in light of what such new nuclear weapons will cost not only in money but in damage to the environment and danger to the U.S. population, especially in "national sacrifice areas" such as New Mexico; and in creating an impetus for other nations to develop new nuclear weapons.

4|70 | I agree with William Hartung's proposed "fifth option" CURATORSHIP. "Weapons design, development, and experimentation would largely be eliminated under curatorship, while standby production capabilities would be maintained."

Thank you for permitting these comments to be made and considered.

1

Healy, Billie
Page 1 of 2

PC_823

Levens, Matthew

From: Billie Healy [Billie.Healy@pcusa.org]
Sent: Monday, April 07, 2008 1:26 PM
To: Complex2030
Subject: Opposition to "Complex Transformation" Proposal

Attachments: image001.gif

image001.gif
(3 KB)

Dear Sir or Madam,

1|16A 2|1F | I am vehemently opposed to the proposal for a new nuclear weapons complex and establishment of a permanent nuclear arsenal. This action would be a direct violation of the Non-Proliferation of Nuclear Weapons Treaty that the United States signed in 1968.

2|1F (cont.) 3|1J | Not only does this violate the NPT but shows the world that we are hypocrites. As a world leader, we should be setting the pace for a new world order, not violating treaties that we would expect others to honor.

Thank you for listening and for your strong consideration of my request.
Grace and peace,

Billie

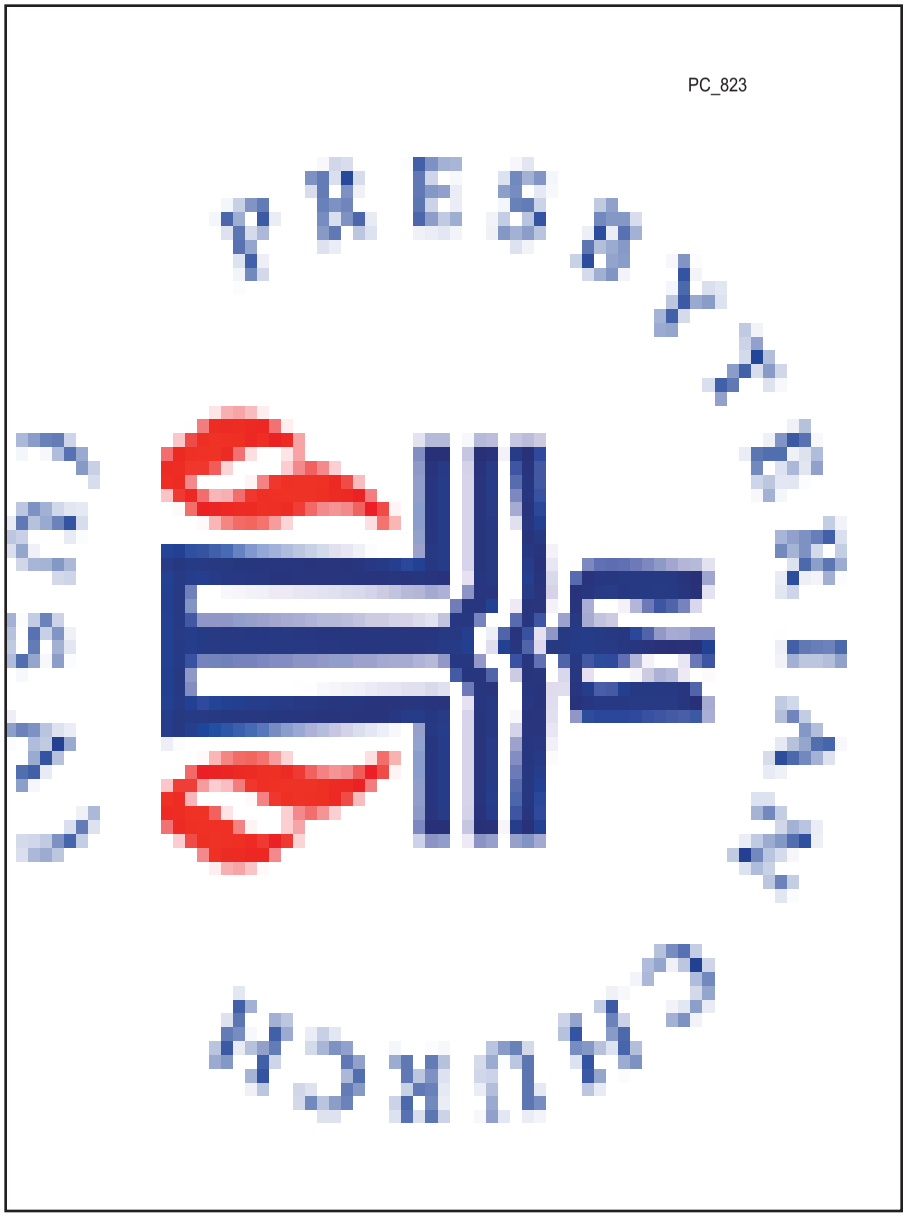
Wilhelmina (Billie) Healy
Editor, Mission Yearbook for Prayer & Study General Assembly Council
502-569-5689
888-728-7228, ext. 5689
Billie.Healy@pcusa.org

[cid:image001.gif@01C898B2.76278040]

1

Healy, Billie
Page 2 of 2

PC_823



Heaslet, Andy
Page 1 of 1

PC_1922

Levens, Matthew

From: Andy Heaslet [donpablo18@hotmail.com]
Sent: Wednesday, April 16, 2008 4:25 PM
To: Complex2030
Subject: No New Nukes!

Andy Heaslet
710 Westgate, Apt #1
University City, MO 63130-3510

April 16, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

Greetings,
1|16A; 2|3A; 3|1J --I am writing to urge you to vote against any legislation that leads to the production of new weapons grade nuclear materials and/or delivery devices. Our nation already has the largest stock-pile of nuclear weapons in the world and by creating new weapons, we will simply be instigating another arms race, which, as you know, our nation simply cannot afford.
--Thank you for your time and for your service to your nation and community. I wish you a pleasant, nuclear free spring!

Sincerely,

Andy Heaslet
(636) 352-9488

1

Heaton, George
Page 1 of 1

PC_482

Buenaflor, Justin

From: George Heaton [geoh225@yahoo.com]
Sent: Tuesday, March 11, 2008 12:36 PM
To: Complex2030
Subject: Proposal to build new atomic bomb faciliies.

George Heaton
817 Santa Fe Ave
Stanford, CA 94305-1022

March 11, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A; 2|9B I am strongly opposed to new atomic bomb facilities. They are counter productive in terms of world peace, and divert funds from education, welfare and infrastructure.

Sincerely,

George Heaton
6508579228

1

Heckathorn, Jane
Page 1 of 1

Page 1 of 1

PC_1539

Levens, Matthew

From: sophiactr@aol.com
Sent: Tuesday, April 08, 2008 2:17 PM
To: Complex2030
Subject: The National Nuclear Safety Administration

1|1C 2|16A Greetings! It has come to my attention the National Nuclear Safety Administration under the DOE has put together a plan called "Complex Transformation."
The NNSA makes this idea sound great...I oppose this proposal PEIS which is based on Bush's 2001 Nuclear Posture Review. Congress has specifically requires the incoming president to purpose a new Nuclear Posture Review saying it " should be used as a basis for establishing future United States arms control objectives and negotiating positions."
The House Armed Services Committee specifically stated "there's is an urgent need for a debate over the role of nuclear weapons in United States strategic posture. So NNSA's Complex Transformation PEIS should be withdrawn until the new administration has issued its own Nuclear Posture Review. The Complex Transformation as it is currently written is premature. Sincerely, Jane Heckathorn, Oakland, CA

Get the MapQuest Toolbar, Maps, Traffic, Directions & More!

5/16/2008

Hefner, Patricia
Page 1 of 1

PC_1829

Levens, Matthew

From: Patricia Hefner [hefnerpatriciahefnerpatricia@yahoo.com]
Sent: Wednesday, April 02, 2008 10:08 AM
To: Complex2030
Subject: I'm opposed to new nuclear weapons

Patricia Hefner
2835 Berwick Road
Birmingham, AL 35213-3413

April 2, 2008

Complex Transformation Department of Energy

1|16A Complex Transformation Department of Energy:

Please vote against new nuclear weaons.
Patricia Hefner

Sincerely,

Patricia Hefner
933-7899

1

Heinonen, Valerie
Page 1 of 2

Mercy Investment Program

PC_1251

Valerie Heinonen, o.s.u., Consultant, Corporate Social Responsibility
205 Avenue C, #10E ~ New York, NY 10009
Phone and fax 1-212-674-2542 ~ E-mail heinonenv@juno.com

Complex Transformation Supplemental Programmatic Environmental Impact Statement (draft Complex Transformation SPEIS, DOE/EIS-0236-S4)

March 31, 2008

Theodore A. Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue SW
Washington, DC 20585

Dear Mr. Wyka:

I am writing on behalf of four Roman Catholic religious institutional investors to oppose the Complex Transformation Supplemental Programmatic Environmental Impact Statement, the most recent version of DOE's "Complex 2030" plan proposed for the renovation of the nuclear weapons complex. We institutional investors have direct experience and knowledge of the environmental, human and social services impact of the nuclear weapons complex dating back to the late 1970s-early 1980s. We, as investors, held stock in ATT, DuPont, GE, Martin Marietta, Monsanto, Rockwell International, Union Carbide and Westinghouse, all of which had DOE contracts for component production.

Since the late 1970s, the Dominican Sisters of Hope, Mercy Investment Program, the Sisters of Mercy Regional Community of Detroit and the Ursuline Sisters of Tildonk-U.S. Province have consistently introduced shareholder resolutions, engaged corporate management and participated in community forums with workers and neighbors of the production facilities. The corporations are indifferent to pleas for worker, community and environmental safety. The Department of Energy also ignores these impacts and furthermore, over the years has consistently thwarted community, NGO and worker efforts to obtain records to prove workers' right to medical care for exposure to radioactivity and the communities' right to environmental remediation.

We oppose the Complex Transformation SPEIS for the following reasons.

The NNSA, which oversees the Department of Energy's nuclear weapons facilities, spends billions of dollars annually to make sure our nuclear arsenal is reliable and will last for decades. Furthermore, your own analysis estimates some $200 billion will be needed to continue this work plus effect the transformation.

Some 10,000 nuclear warheads and the tons of plutonium and highly enriched uranium used to manufacture them are stored at these facilities. In addition to posing an enormous threat to human life and environment, nuclear weapons are a Cold War relic--strategically useless.

The U.S. government has the capability to decommission its nuclear warheads without the construction of a new facility that actually enables greater warhead production. We agree with the professed goal to reduce the stockpile, but not the reality of a nuclear complex that increases production capabilities.

Heinonen, Valerie
Page 2 of 2

PC_1251

The Complex Transformation is a waste of human, environmental and financial resources. There are many U.S. and world human needs, among them health care, education, affordable housing, jobs that pay a living wage, security of food and water. Additionally, **this is an election year. It makes no sense to proceed with a plan that has the potential to change under a new President and new Congress.**

Article VI of the Nuclear Non-Proliferation Treaty, to which the U.S. is both a signatory and one of the chief architects, **says that the United States is obligated to engage in effective multilateral efforts leading to nuclear disarmament.** By defying international law and building a new generation of nuclear weapons, the U.S. is hindering international non-proliferation initiatives and crippling international nuclear disarmament efforts. The reconfiguration of nuclear facilities will increase nuclear weapons-making capabilities. **Complex 2030 enforces the perception that the U.S. is preparing another nuclear arms race:** as the U.S. government pressures Iran and North Korea to abandon their nuclear weapons programs, it announces plans to consolidate and increase its own nuclear arsenal.

Finally, we support the comments of William D. Hartung, Director, Arms and Security Initiative, New America Foundation, Washington D.C. made on March 25, 2008 at Hearings on the Department of Energy/National Nuclear Security Administration's Draft Supplemental Programmatic Environmental Impact Statement (SPEIS) on Plans to Modernize the Nuclear Weapons Complex ("Complex Transformation"). We believe his arguments questioning Complex Transformation are sound. Based on our own experience with the nuclear industry, we are in agreement, too, with William Hartung's statement that **the Complex Transformation "represents a bailout for a nuclear weapons industry that is increasingly irrelevant to the emerging threats that we face as nation and as a global community.** The funds proposed for building a new nuclear weapons complex would be far better spent addressing threats like the need to clean up the environmental hazards caused by past nuclear weapons production; finding new technologies and processes for verifying a world of "zero nuclear weapons;" and investing in dealing with overarching threats like climate change."

We affirm opposition to the Complex Transformation plan.

Yours truly,

Valerie Heinonen, o.s.u.

Heinrichs, Todd
Page 1 of 2

PC_769

Levens, Matthew

From: Todd Heinrichs [todd.heinrichs@comcast.net]
Sent: Monday, March 17, 2008 10:57 PM
To: Complex2030
Subject: public comments

Mr. Wyka,

I made some comments near the end of the public meeting in Los Alamos on Wednesday, March 12, 2008. However, when I got up in front of the audience, I got a little tongue tied. What I have written below is an amplification of my remarks at the meeting -- what I would have said if I were as good a public speaker as I am a science WRITER.

1|7N; 2|15A I have read the summary section of the SPEIS document, and I am familiar with the DOE/NNSA plan options for transforming the nuclear weapons (NW) complex and their preferred alternative. I support their selection of the Distributed Centers of Excellence option as their preferred alternative for the future of the NW complex. I believe that this option introduces streamlining and economy where necessary to prepare the complex to flexibly support the nation's NW deterrent needs into our uncertain geopolitical future.

I would like to point out one deficiency I believe exists in the preferred alternative that should be corrected before it becomes the Record of Decision.

3|10B 4|7M The summary section of the SPEIS accurately and appropriately points out the positive effects that the scientific initiatives undertaken by the NW Program has had and will continue to have for other scientific research at Los Alamos and, indeed, across the nation and throughout the general scientific community. The actinide science, weapons physics research, and unparalleled advances in computer science (both architecture and applications) involved in the development and use of the Roadrunner machine clearly benefit unclassified, non-weapons research -- and would not exist without the needs of and funding by the NW Program.

However, what I did not find clearly stated in the SPEIS is that the reverse is also true. Los Alamos National Laboratory is an exceedingly diverse and vibrant scientific community. (Indeed, as you well know, until the advent of the National Laboratory system in the early eighties, we were know as Los Alamos SCIENTIFIC Laboratory.)

As a matter of fact, that is the primary reason that the Laboratory caught my attention and drew me here to begin my career. My first exposure to the Laboratory (other than my middle-school history class section on the Manhattan Project) was an issue of Los Alamos Science that was in my college library's periodical section. That one issue contained articles on the Laboratory's research for the Human Genome Project, metallurgy, materials research (both tank armor and fuel cells), nonproliferation, and (of course) actinide science. I was struck by that diversity of research initiatives at a place I had only associated with nuclear weapons. When it came time for me to undertake a graduate internship, I chose Los Alamos -- based on this exposure and subsequent inquiry.

During my career as a science writer, I have been witness to and heard tertiary accounts of instances where a methodology, technique, apparatus or diagnostic, or even an idea that has been developed for a non-weapons science initiative has had an impact on a weapons-related program. These impacts would not have happened had the Laboratory not been the diverse scientific community that it is.
I believe that it is in the best interests of DOE/NNSA that the NW Program at Los Alamos to continue to exist within this institution's diverse scientific community.

What I would like to see contained in the Record of Decision document for complex transformation is a clearly articulated, prominently featured statement of DOE/NNSA's commitment to continue to nurture basic science and other non-weapons research at its national security science laboratories.

Thank you for your attention.

1

Heinrichs, Todd
Page 2 of 2

PC_769

Sincerely,
Todd Heinrichs
3577-B Villa Street
Los Alamos, NM 87544-2567

2

Helfrich, Devin
Page 1 of 14

PC_1962

Levens, Matthew

From: Devin Helfrich [devin@fcnl.org]
Sent: Wednesday, April 30, 2008 3:52 PM
To: Complex2030
Subject: Complex Transformation PEIS Comments

Attachments: Complex Transformation PEIS Comments.pdf

Complex
ormation PEI

Ted,

Please find the attached comments.

Hope all is well.

Best,

Devin Helfrich, Legislative Assistant

Friends Committee on National Legislation (Quakers)

Email: Devin@fcnl.org <mailto:Devin@fcnl.org>

Phone: (202) 547.6000 Ext. 2520

Fax: (202) 547.6019

Website: www.fcnl.org <http://www.fcnl.org/>

1

PC_1962

Public Comments to the Energy Department on the Supplement to the Stockpile Stewardship and Management Programmatic Environmental Impact Statement Complex Transformation

Submitted by

Alliance of Baptists
American Baptist Churches USA
Baptist Peace Fellowship of North America
Church of the Brethren Witness/Washington Office
Churches' Center for Theology and Public Policy
Conference of Major Superiors of Men
Disciples Justice Action Network (Disciples of Christ)
Episcopal Church
Evangelical Lutheran Church in America
Friends Committee on National Legislation (Quakers)
Islamic Society of North America
Leadership Conference of Women Religious
Maryknoll Office for Global Concerns
Mennonite Central Committee U.S.
Methodists United for Peace with Justice
National Council of Churches USA
National Religious Partnership on the Nuclear Weapons Danger
NETWORK: A National Catholic Social Justice Lobby
Pax Christi USA: National Catholic Peace Movement
Pentecostals and Charismatics for Peace and Justice
Presbyterian Church (U.S.A.)
Religious Action Center of Reform Judaism
Sojourners
Unitarian Universalist Association of Congregations
United Church of Christ
United Methodist Church, General Board of Church and Society
Women's Action for New Directions (WAND)

and

52 State and Regional Religious Organizations

Submitted to

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, S.W.
Washington, DC 20585

April 30, 2008

PC_1962

Summary

As religious leaders in the United States, we firmly oppose the administration's multi-billion dollar plan to rebuild the nation's nuclear weapons capabilities through the Department of Energy's Complex Transformation proposal.

1|9H;
2|1J;
3|13A.1;
4|16A

The administration's plans to rebuild the U.S. nuclear weapons production capacity is dangerous and expensive, and could reignite an arms race, encourage proliferation, and reduce national security. We believe that to restart U.S. nuclear warhead production and possibly build new weapons as called for by the Energy Department's preferred plan, will risk the lives of the entire human family.

2|1J (cont)

We urge our political leaders to follow instead the course outlined by statesmen George Shultz, William Perry, Henry Kissinger, and Sam Nunn by taking immediate and deliberate steps toward multilateral nuclear disarmament. Many of these steps would directly involve the Energy Department and the future of the weapons complex including: increasing nonproliferation efforts, accelerating weapon dismantlement, and extending key arms control treaties.[1] To this list, we would add pursuing alternative missions for the national nuclear laboratories. This path, away from nuclear weapons, will make us safer and is consistent with our moral values.

4|16A (cont)

Along with these steps, we call on our political leaders to show the moral and political courage necessary to bring about a shift in our nation's nuclear weapons posture. Today we have a historic opportunity to begin the journey out from under the shadow of nuclear weapons. We hope and pray that all Americans will take advantage of this moment and join us as we work toward the total elimination of these weapons of mass destruction.

In line with these beliefs, we propose a No Production Alternative to Complex Transformation. This would include the following steps:

4|16A (cont)

- Place a moratorium on new warhead designs.
- Do not expand plutonium pit production capacity.
- Consolidate and downsize the Nuclear Weapons Complex.
- Continue the nuclear testing moratorium.

Our joint public comments on the Energy Department's Complex Transformation proposal are divided into two main sections. In the first section, we address the Energy Department's preferred alternative for Complex Transformation. In the second, we set forth our proposed No Production Alternative for Complex Transformation.

[1] Henry Kissinger, et al., "Toward a Nuclear-Free World," *Wall Street Journal,* January 15, 2008, p. A13, http://online.wsj.com/public/article_print/SB120036422673589947.html

PC_1962

Energy Department's Preferred Alternative

The Department of Energy's (DOE) stated goal is "to make the Nuclear Weapons Complex smaller, and more responsive, efficient, and secure."[2] We endorse all of these stated priorities, except for a more "responsive" Complex, which we firmly reject.

5|2O "Responsiveness is the ability to quickly react to new developments and threats and successfully execute SSP [Stockpile Stewardship Program] requirements...Lack of responsiveness is evidenced by...the lack of a sufficient pit production capability."[3] Or in plain terms, a responsive Complex means having the ability to quickly produce new warheads and warhead components.

6|3A The United States has no need for new nuclear weapons production now or in the foreseeable future, either to replace existing warhead types or to build warheads designed for new missions. New infrastructure to support the production up to 80 warheads per year, as proposed by the Energy Department is wasteful, unneeded, and dangerous.

5|2O (cont) U.S. nuclear arsenal is "safe and reliable," and has been certified by the President as such since 1996. In the annual stockpile assessment, submitted by the President and by the Secretaries of Defense and Energy to Congress, the U.S. stockpile has been certified as safe and reliable every year for over a decade. This process was initiated by the Clinton administration in 1995-1996 and was codified in Sec. 3141 of the defense authorization bill for fiscal year 2003.

7|C.1 The stockpile's warheads are "reliable," based on pit lifetimes, well into the foreseeable future. The DOE's pre-2007 argument that warheads would soon be unreliable due to the aging of their plutonium pits has turned out to be inaccurate. The November 2006 JASON study determined that "most plutonium pit types have credible lifetimes of at least 100 years. Other pit types have mitigation strategies either proposed or being implemented."[4]

The administration has argued that new warheads with new missions may be required to address what they have termed "emerging threats." In the Energy Department's words, "[e]merging threats could call for new or modified warhead development or for providing additional warheads for force augmentation."[5]

1|9H (cont); 8|1F New nuclear weapons for "emerging threats" and new missions are unnecessary and costly, and would undermine international nonproliferation efforts. As long-time U.S government science advisor Dr. Sidney Drell and Ambassador James Goodby conclude, "We find no need for designing new nuclear weapons against potential new threats."[6]

---

[2] U.S. Department of Energy, *Draft Complex Transformation SPEIS - Summary,* December 2007, http://www.fcnl.org/pdfs/nuclear/SPEIS_Summary.pdf, section S.1
[3] Ibid., section S.2.1
[4] U.S. Department of Energy, *Letter to Sen. John Warner*, November 28, 2006, http://www.fcnl.org/pdfs/nuclear/JASON_ReportPuAging.pdf
[5] National Nuclear Security Administration, *Responsive Infrastructure,* November 2006, http://www.fcnl.org/pdfs/nuclear/Responsive_Infrastructure.pdf
[6] Sidney D. Drell and James E. Goodby, *What Are Nuclear Weapons For?* (Washington, DC: Arms Control Association, 2007), p. V http://www.armscontrol.org/pdf/USNW_2005_Drell-Goodby.pdf

PC_1962

No Production Alternative

We believe the Nuclear Weapons Complex should be aligned with the global security realities of the 21st century and U.S. treaty obligations. To achieve these goals, we propose a No Production Alternative to Complex Transformation, consisting of four components:

- Place a moratorium on new warhead designs.
- Do not expand plutonium pit production capacity.
- Consolidate and downsize the Nuclear Weapons Complex.
- Continue the nuclear testing moratorium.

9|7O **Place a moratorium on new warhead designs.** No new warhead designs are needed now or in the foreseeable future. New nuclear weapons for new missions are unneeded and costly, and undermine international nonproliferation efforts.

Do not expand plutonium pit production capacity. As noted above, there is no need to expand the plutonium pit production capacity of the Complex. The DOE preferred alternative of increasing capacity to up to 80 pits per year at Los Alamos National Laboratory should not be approved. DOE should limit its pit production capacity to its current facilities, which are sufficient to replace the pits destroyed by the Life Extension Program's destructive surveillance activities.

Consolidate and downsize the Nuclear Weapons Complex. We agree with DOE on the need to consolidate and downsize the Complex. Nuclear material scattered across the Complex should be consolidated to mitigate the risks associated with these materials and to reduce the Complex footprint. In addition, unneeded facilities should be closed and cleaned up.

Continue the nuclear testing moratorium. In the interest of national security and nonproliferation, the Energy Department should continue the nuclear testing moratorium.

PC_1962

Names and Addresses of Commenting Organizations

National Religious Organizations

Rev. Stan Hastey, Minister for Mission and Ecumenism
Alliance of Baptists
1328 16th Street, N.W.
Washington, DC 20036

Rev. Dwight M. Lundgren, Reconciliation Ministries, National Ministries
American Baptist Churches USA
P.O. Box 851
Valley Forge, PA 19482

Evelyn Hanneman, Operations Coordinator
Baptist Peace Fellowship of North America
4800 Wedgewood Drive
Charlotte, NC 28210

Phil Jones, Director
Church of the Brethren Witness/Washington Office
337 North Carolina Avenue, S.E.
Washington, DC 20003

Rev. Barbara Green, Executive Director
Churches' Center for Theology and Public Policy
4500 Massachusetts Avenue, N.W.
Washington, DC 20016

T. Michael McNulty, SJ, Justice and Peace Director
Conference of Major Superiors of Men
8808 Cameron Street
Silver Spring, MD 20910

Rev. Dr. Ken Brooker Langston, Director
Disciples Justice Action Network (Disciples of Christ)
1040 Harbor Drive
Annapolis, MD 21403

Maureen Shea, Director, Office of Government Relations
Episcopal Church
110 Maryland Avenue, N.E. #309
Washington, DC 20002

PC_1962

Mary Minette, Director of Environmental Education and Advocacy
Evangelical Lutheran Church in America
122 C Street, N.W., Suite 125
Washington, DC 20001

Joe Volk, Executive Secretary
Friends Committee on National Legislation (Quakers)
245 Second Street, N.E.
Washington, DC 20002

Patricia Anton, Coordinator for the Muslim-Christian Initiative
Islamic Society of North America
110 Maryland Avenue, N.E., Suite 304
Washington, DC 20002

Sr. Marie Lucey, OSF, Associate Director for Social Mission
Leadership Conference of Women Religious
8808 Cameron Street
Silver Spring, MD 20910

Marie Dennis, Director
Maryknoll Office for Global Concerns
P.O. Box 29132
Washington, DC 20017

Rachelle Lyndaker Schlabach, Director, Washington Office
Mennonite Central Committee U.S.
920 Pennsylvania Avenue, S.E.
Washington, DC 20003

Howard W. Hallman, Chair
Methodists United for Peace with Justice
1500 16th Street, N.W.
Washington, DC 20036

Wesley M. Pattillo, Senior Program Director for Justice, Advocacy, and Communication
National Council of Churches USA
475 Riverside Drive, Suite 880
New York, NY 10115

Jessica Wilbanks, Co-Coordinator
National Religious Partnership on the Nuclear Weapons Danger
Churches' Center for Theology and Public Policy
4500 Massachusetts Avenue, N.W.
Washington, DC 20016

PC_1962

Sr. Simone Campbell, SSS, Executive Director
NETWORK: A National Catholic Social Justice Lobby
25 E Street, N.W., Suite 200
Washington, DC 20001

Dave Robinson, Executive Director
Pax Christi USA: National Catholic Peace Movement
532 West Eighth Street
Erie, PA 16502

Rev. Dr. Paul Alexander, Co-Founder
Pentecostals and Charismatics for Peace and Justice
617 Ranch Lane
Glendora, CA 91741

Sara Pottschmidt Lisherness, Director, Compassion, Peace and Justice Ministry
General Assembly Council
Presbyterian Church (U.S.A.)
100 Witherspoon Street
Louisville, KY 40202

Rabbi David Saperstein, Director
Religious Action Center of Reform Judaism
2027 Massachusetts Avenue, N.W.
Washington, DC 20036

Adam R. Taylor, Senior Political Director
Duane Shank, Senior Policy Advisor
Sojourners
3333 14th Street, N.W., Suite 200
Washington, DC 20010

Rob Keithan, Director, Washington Office for Advocacy
Unitarian Universalist Association of Congregations
1320 18th Street, N.W., Suite 300B
Washington, DC 20036

Sandra L. Sorenson, Justice and Witness Ministries
United Church of Christ
100 Maryland Avenue, N.E., Suite 330
Washington, DC 20002

James E. Winkler, General Secretary
United Methodist Church, General Board of Church and Society
100 Maryland Avenue, N.E.
Washington, DC 20002

PC_1962

Rev. Amanda Hendler-Voss, Faith Communities Coordinator
Women's Action for New Directions (WAND)
691 Massachusetts Avenue
Arlington, MA 02476

State and Regional Religious Organizations (listed by state)

Rev. Richard K. Heacock, Jr., Executive Director
Alaska IMPACT
3012 Riverview Drive
Fairbanks, AK 99709

Sister Maureen Campbell, Regional Leader
Sisters of the Holy Faith
12322 Paramount Boulevard
Downey, CA 90242

Rev. Richard Bunce, Chair
Interfaith Communities United for Justice and Peace (ICUJP)
P.O. Box 483
Pasadena, CA 91102

The Rev. Dr. Rick Schlosser, Executive Director
California Council of Churches and California Church IMPACT
4044 Pasadena Avenue
Sacramento, CA 95821

Rev. Dr. Diana Gibson, Co-Executive Director*
Council of Churches of Santa Clara County
1710 Moorpark Avenue
San Jose, CA 95128

Marion Irvine, OP, Promoter of Social Justice
Dominican Sisters of San Rafael
1520 Grand Avenue
San Rafael, CA 94901

Bette Gambonini, West Region Leadership Team for the Sisters of Charity, BVM
Regional for the West Region
1220 Tasman Drive, #303
Sunnyvale, CA 94089

The Rev. Dr. Stephen Sidorak, Executive Director
Christian Conference of Connecticut
60 Lorraine Street
Hartford, CT 05401

Helfrich, Devin
Page 10 of 14

PC_1962

The Rev. Willie Israel, Florida District Representative
Moravian Church in America, Southern Province
1525 State Road 434 West
Longwood, FL 32750

Martha R. Beach, District Executive Minister
Atlantic Southeast District, Church of the Brethren
P.O. Box 7
Lorida, FL 33857

Kent J. Siladi, Conference Minister
Florida Conference, United Church of Christ
924 North Magnolia Avenue, Suite 250
Orlando, FL 32803

Bishop Charles Leigh
Apostolic Catholic Church
7813 North Nebraska Avenue
Tampa, FL 33604

Bishop Edward R. Benoway
Florida-Bahamas Synod ELCA
3838 West Cypress Street
Tampa, FL 33607

Rev. Alan Beaver, Florida Conference, United Methodist Church
Florida Council of Churches
3838 West Cypress Street
Tampa, FL 33607

Rev. W. Harvey Jenkins, Synod of the South Atlantic Representative
Florida Council of Churches
3838 West Cypress Street
Tampa, FL 33607

The Rev. Russell L. Meyer, Executive Director
Florida Council of Churches
3838 West Cypress Street
Tampa, FL 33607

Rev. Berwyn Oltman, Church of the Brethren Representative
Florida Council of Churches
3838 West Cypress Street
Tampa, FL 33607

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Helfrich, Devin
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Peggy Nolan, BVM, Vice President
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19 Pleasant Avenue
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Helfrich, Devin
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215 East 14th Street
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Helfrich, Devin
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Harrisburg, PA 17109

The Rev. Sandra L. Strauss, Director of Public Advocacy
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Bellevue, WA 98009

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Elm Grove, WI 53122

Arlene Woelfel, SSSF, International Leadership Team
School Sisters of Street Francis
1501 South Layton Boulevard
Milwaukee, WI 53215

Florence Deacon OSF, Director
Sisters of Street Francis of Assisi
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Street Francis, WI 53235

Scott Anderson, Executive Director
Wisconsin Council of Churches
750 Windsor Street, Suite 301
Sun Prairie, WI 53590

Rev. Warren Murphy, Executive Director*
Wyoming Conference of Churches
P.O. Box 20812
Cheyenne, WY 82003

** These signatories have signed in a personal capacity and are not representing their organization in supporting this statement.*

This statement was submitted to the Energy Department on March 25, 2008. It is being submitted again on April 30, 2008 with additional signatures.

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Hemminger, Beth
Page 1 of 1

PC_819

Levens, Matthew

From: Beth Hemminger, OSU [bhemminger@stiggys.org]
Sent: Thursday, March 27, 2008 7:44 PM
To: Complex2030
Subject: nuclear weapons

Beth Hemminger, OSU
651 White St.
Toledo, OH 43605-2717

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A WE do not need to build a plant to produce plutonium pits for nuclear weapons. We do ot need to rebuild any nuclear weapons. We are not a safer country when we produce weapons and neglect our people who need food, housing, medecine and other necessities of life. Our people are our greatest security.

Sincerely,

Beth Hemminger, OSU
419-691-9404

Hemminger, Beth
Page 1 of 1

PC_383

Levens, Matthew

From: Beth Hemminger, OSU [bhemminger@stiggys.org]
Sent: Tuesday, March 25, 2008 11:17 AM
To: Complex2030
Subject: New Nuclear Weapons

Beth Hemminger, OSU
651 White St.
Toledo, OH 43605-2717

March 25, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I strongly oppose the Administration's plan to build a plant for new nuclear facilities and to build warheads.

2|1J How can we expect other countries to stop what we are continuing? How can we expect respect from other countries when we do not do what we preach? When will we as a country learn to support the needs of people over military costs?

Please continue to rebuke the Energy department's attempts to fund trhese efforts.

Sincerely,

Bweth A. Hemminger
419-691-9404

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Henderson, Dove
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PC_144

Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

Written Comment Form

Must be received on or before April 10, 2008.

1|15A I believe that transformation is desirable and actually required to improve safety of personnel and provide security for our country for the future.

I want to congradulate NNSA is pursuing this long overdue initiative

Dove Henderson

Please use other side if more space is needed.

Comment forms may be mailed to:
Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Comment forms may be faxed to:
(703) 931-9222
or sent by electronic mail to:
complextransformation@nnsa.doe.gov

You may also submit comments through the project website which can be found at:
http://www.complextransformationspeis.com

Henderson, Leslie
Page 1 of 1

ROANE COUNTY TENNESSEE THE ROANE ALLIANCE Innovation Valley Partner

PC_41

February 20, 2008

Mr. Ted Wyka
U.S. Department of Energy
National Nuclear Security Administration
Office of Transformation NA-10.1
1000 Independence Avenue, NW
Washington D. C. 20585

Dear Mr. Wyka :

1|10I — As President and CEO of The Roane Alliance – which is made up of the Roane County Chamber of Commerce; the Roane County Industrial Development Board, and the Roane County Visitor's Bureau – I am writing to let you know of the Alliance's unwavering commitment and support for the on-going mission at the Y-12 complex in Oak Ridge, TN.

2|5C, 3|7N — In addition, I wanted to inform you that the **Board of Directors of the Roane County Chamber this morning voted unanimously to support the NNSA's proposed plan to maintain a uranium center of excellence for the complex in Oak Ridge, Tenn., known as Distributed Centers of Excellence -- the preferred alternative.**

4|15A, 1|10I (cont) — Like others in DOE communities around the nation, we have followed the Department's plans to reduce the size and scope of the complex, while maintaining those critical capabilities needed to keep our nation secure. Known as the Fort Knox of enriched uranium, Y-12 has manufactured components of every weapon in the stockpile, and is currently recognized as the U.S. center of excellence in uranium. The Complex 2030 plan supports that ongoing mission. Y-12 is -- and we hope will continue to be for the next generation -- a key component of the nuclear weapons complex. It is a significant player in our economic well-being in Roane County and one that the Chamber has long supported.

- We support the transformation of the nuclear weapons complex to make it smaller, more responsive, safer and more secure.
- We support the NNSA's work to modernize the Y-12 Complex, including the completion of the special materials storage facility at Y-12, and the construction of a new uranium production facility.
- As part of this activity, we want to work with NNSA and DOE's environmental management program to finish the clean up needed on the site

Thank you for the opportunity to share our comments on the National Nuclear Security Administration's Complex 2030 programmatic environmental impact statement.

Sincerely,

Leslie Henderson
President/CEO The Roane Alliance

cc: Kathy May-Martin

INDUSTRIAL DEVELOPMENT BOARD CHAMBER OF COMMERCE VISITORS BUREAU

1209 N. Kentucky Street • Kingston Tennessee 37763 • Telephone: 865.376.2093 • Fax: 865.376.4978 • www.roanealliance.org

Hendrie, Ann
Page 1 of 2

04-08-2008 15:20 DIXON COOP T 15055799625 PC_311

Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement— U.S. Department of Energy National Nuclear Security Administration

NNSA

Written Comment Form

Must be received on or before April 10, 2008.

1|9B — Yes, I would like to see Los Alamos remain as the primary location for the plutonium pit production mission. I do not support the construction of new nuclear weapons. To continue building nuclear weapons is a crime against all of humanity and the earth herself. There is no justification for continuing this insanity; only the most perverted reasoning can make a logical – if not demonic – argument to continue on the course of creating more WMD's.

2|16A — Your SPEIS consideration and attempt to use the Yucca Mtn. repository is unconscionable. It is the creation of increased environmental hazards for generations to come. Leaving waste in the ground where it is, is the safest option.

3|140; 4|2B — The so-called "smaller" version of nuclear weapons that will create even more radioactive stuff will come to Los Alamos. This will add to the already huge increased water needs which will be a problem.

Basis for "human health and accidents" as reason for [illegible] according to your report, but that is blatantly false. Even small doses of radioactivity are dangerous to humans (and the environment), no matter if the EPA and DOE change the standards to accommodate the increase in levels of exposure. As for accidents, they have been and keep happening.

Please use other side if more space is needed.

Comment forms may be mailed to:
Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Comment forms may be faxed to:
(703) 9[illegible]
or sent by electronic mail to:
complextransformationseis@nnsa.doe.gov

You may also submit comments through the project website, which can be found at:
http://www.complextransformationseis.com

Hendrie, Ann
Page 2 of 2

04-08-2008 15:21 DIXON COOP MARKET 15055799625 PAGE:1

5|1K

LANL's mission / bud ass for "worthless compensation" – well, IF you can jump through the bureaucratic hoops put up to make one's requests an exhausting and intimidating experience, then maybe one might qualify for the piddle $150,000 before one dies of cancer. (All those working at Rocky Flats automatically qualified for the $150,000 pay off.) – And why is this process so difficult? To dissuade, perhaps, and to distract the claimants from making a class action lawsuit, and getting much more money!

1|9B (cont.)

All of this is shameful. But, there is, indeed, the opportunity how to turn things around. One can start by doing honest with the public. We are NOT AGAINST the people working in Los Alamos. We do not wish a single job to be lost. We just want a change of MISSION. We believe in the possibility of PEACE, but NOT with the Threat of NUCLEAR EXTINCTION hanging over the heads of all the other countries in the world. We have become the very specter of evil which we used to project on Russia – Ofcourse – Just as 85% of Americans are now against the war in Iraq, 85% of the world (at least) is against the proliferation of nuclear weapons. It all started at LANL, and the responsibility for their breeding still resides here. Look for your courage to change into leaders of peace and nuclear disarmament.

Thanks you –

Ann Hendrie

6|2E

Please give a ninety-day extension to the public comment time, as requested already by now many of the hearings, and even by Gov Richardson + Congressman Udall.

Hendrie, Ann
Page 1 of 2

PC_276

Mr. Theodore A. Wyka
Complex Transformation SPEIS Document Manager
U.S. Department of Energy, NA-10.1
1000 Independence Avenue SW
Washington, DC 20585

ANN HENDRIE
HCR 65, Box 494
Dixon, NM
87521

1|7O

Your Additional Comments: MR WYKA – Please convey the following to DOE –

I, too, add my voice to those OUTRAGED by the LACK OF THE MOST DESIREABLE OPTION IN YOUR EIS for the Complex Transformation, ie, stop production of all plutonium pit production entirely, + truly transform this complex into work which would address and remediate the very problems which present bomb production have created (such as, waste disposal, RADIATION EXPOSURE, DIALOGUE + DIPLOMACY, ENERGY INDEPENDENCE – ALTERNATIVE – non-nuclear, etc.).

2|14O The Nepa process was originally created for that purpose – to have meaningful public input – Your information booklet is simply a charade and an insult to our desire for a real discussion. Never are # stated the environmental impacts!!!

3|11D The air, water and land quality have already been compromised, LANL has failed to meet cleanup already – And NOW, you want to give the kids bigger waterhose to play with?? This is insanity of the highest order.

And lastly, I would suggest that you stop promoting these expensive "bromides" with euphemisms like "smaller, safer, more secure, less expensive, responsive, centers of excellence" etc. and reassess – What you really mean is exactly the opposite – Now Mornings
for them, of course, we live in a "national sacrifice zone" –
The people want CHANGE, AND IT STARTS of the order you have been
4|3A Please print your name and address for DOE to respond to your comments
thinking – rather it is a total rejection of Cold-war THINKING and an EMBRACING of PEACE-MAKING ACTIVITIES – NO MORE BOMBS!!! NEVER, NO WHERE – EVER AGAIN

Hendrie, Ann
Page 2 of 2

5|2E.1

90-DAY EXTENSION OF TIME

.... AND THEN ANOTHER ONE (PLEASE)

FOR THE COMMENT PERIOD ON THE DRAFT COMPLEX TRANSFORMATION SPEIS

www.nnsa.doe.gov/complextransformation.htm

comments currently due April 10, 2008

Hennig, Mary
Page 1 of 1

PC_207

3/3/08

Theodore Wyka
Complex Transformation Speis Document Mgr.
U.S. Dept of Energy
1000 Independence Ave SW
Washington, DC 20585

Dear Sir:

I'm writing in the hopes that we can stop spending billions on bombs. No new bomb plants, no new bombs, no old bombs, no Stockpile Life Extension bombs. 1|16A

Spend this money on building a stronger society, where all have food, shelter, health care and a living wage job. 2|9B

Lead the world to true security + keep the promise we made in the non-proliferation Treaty in 1970 to pursue complete disarmament. 3|1F

May God guide you in all the decisions you make!!

Sincerely,

Mary E. Hennig

Ms. Mary Hennig
8180 Allen Rd.
Clarkston, MI 48348

Herbert, Patricia

Page 1 of 1

PC_682

Levens, Matthew

From: Pat Herbert [sequoia592000@yahoo.com]
Sent: Friday, March 21, 2008 7:59 PM
To: Complex2030
Subject: Complex Transformation

Dear Mr. Theodore A. Wyka:

I have some comments on the Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement. It is probably too late to comment however I am hoping the comment period is still open. My statements follow.

1|16A It's amazing to me how the DOE, DOD, and US Government can still be continuing with the discussion of keeping, replacing and enlarging the nuclear weapon stockpiles. Haven't we all decided nuclear weapons are no longer a choice in conflicts? When we are seeing the destruction of large areas or consider the whole planet's fate with these weapons haven't they become obsolete? What about the idea of innocent civilians or is this reality obsolete? Ever since I witnessed the death of hundreds of animals and later humans around Rocky Mountain Arsenal and Flats in the 1960's after the plutonium fires I haven't much supported the nuclear idea in our country. There are many military personnel who oppose the idea of nuclear weapons. So, why can't we leave this topic forever and decrease ours and the world's supply of them. It would be so life affirming.

2|5C1 3|9H We also know that the current stockpile of nuclear weapons are usable and reliable for another 50 years. Both the DOE and JASONS certify the reliability of our current nuclear weapons. The Los Alamos National Laboratory is capable of producing plutonium pits so why consider the costs to build another facility? The Draft talks about replacing facilities but as I read on I find all eight areas would still be functioning at completion. This program is a waste of taxpayers money and is therefore questionable as a serious project to be undertaken. You have frightened people into believing there is a need to replace and rebuild nuclear weapons which has taken away from our countries real needs.

4|1F 1|16A (cont.) 5|7O We need to close these facilities around the world and reaffirm our commitment to eachother in supporting of life's evolving systems affirming a comfortable life for all of us on this planet. And because I believe in these values as a real first step I support the Nuclear Nonproliferation Treaty and the alternative considerations to "Pursue Dismantlement and Refrain from Designing and Building New Nuclear Weapons" and "Do Not Produce New Pits" which would realistically eventually lead to the total destruction of nuclear weapons and the nuclear complex in our country and the mutually assisted program in other countries. Not supporting what we currently see as the choice to increase the nuclear complex is the sanest choice we can make as a nation.

Thank you for allowing me to comment. I would like to comment on the Final EIS if it is possible and would need you to send it to me.

Sincerely,

Patricia A. Herbert
PO Box 1874
Vashon, WA 98070

Be a better friend, newshound, and know-it-all with Yahoo! Mobile. Try it now.

5/14/2008

Herring, Thomas

Page 1 of 1

PC_1874

Levens, Matthew

From: therring@centurytel.net
Sent: Friday, April 04, 2008 8:41 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

16A The Complex Transformation Initiative reads like a plan to make more nuclear weapons. This is unwise to the point of insanity, especially at a time of increased competition for remaining oil.
Please, please do not make one single more god-forsaken bomb.

Sincerely,
Thomas Herring
PO Box 13208
Burton, WA 98013

cc:
Senator Patty Murray
Representative Jim McDermott
Senator Maria Cantwell

Hexamer, Maury
Page 1 of 1

PC_2058

Levens, Matthew

From: maury hexamer [del200002000@yahoo.com]
Sent: Wednesday, April 30, 2008 11:14 AM
To: Complex2030
Subject: No Money for Nuclear Weapons

maury hexamer
2481 ulric st.
san diego, CA 92111-6042

April 30, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

Future generations (if they survive) will look at the Bush/Cheney presidency and say that virtually everything that could be done wrong was done wrong and that it unleashed a virtual tsunami of death and destruction.

1|1K 2|14K This administration remains oblivious to the real threats life on earth--like climate change, impending depletion of nonrenewable energy sources, war as an instrument of policy, food and clean water shortages, and social and economic injustices. This administration remains oblivious to the fact that our air and water are full of toxins or that radiation releases from past production and testing of nuclear weaponry continue to cause acute myelogenous leukemias in both children and adults. They seem not to know that "Depleted Uranium" is a misnomer, that the 4.5 billion year half-life of U-238 will mean certain death to untold millions of children and adults of future generations--even with the lowest estimates of increased leukemia rates due to radiation.

3|1J Earlier rationale's for developing and maintaining nuclear weapons have been shown to be fatally flawed. Nonproliferation treaties have not worked. The concept of deterrence is no longer valid when countries around the world, including Pakistan, North Korea, and Israel have nuclear weapons. This administration's paranoid, destructive arrogance and bombast--its insane and criminal disregard for the lives and safety of most of the world's human population and for life on earth has made the United States an object of widespread hatred, contempt and ridicule. It is time to stop the madness.

4|9B A decision at this critical and precarious time in our earth's history to invest our increasingly scarce resources in a flawed and failed nuclear weapons program would be horribly misguided and tragic.

Sincerely,

maury hexamer
858-278-2347

1

Hibbs, Linda
Page 1 of 2

March 13, 2008 PC_1033
"Complex Transformation" hearing
in Santa Fe, New Mexico

There is a brute element in our circumstance, those of us living in this cobbled-together place called the U.S.A., a loathsome beast. The loathsome beast is in this room tonight.

Please listen carefully, especially those conducting this meeting tonight. The beast is none of you, nor none of us in the audience, though ALL of us have a choice in how we respond to its pervasive, controlling presence in our lives.

The loathsome beast? It represents the systemic erosion of our power as a people, despite the good will to be citizens. Our ability to effect change in our lives, over matters of life of death, have been taken from us. The beast is the bureaucracy, created since World War II, by executive order, the AEC, Atomic Energy Commission, DOE, Department of Energy, and many more, and it is the way corporations were made to be persons, through legal chicanery, at the end of the 19th century, except that corporations live on forever. Corporations, with their excessive powers, have taken over the mainframe of our government institutions, all three branches, executive, legislative, and judicial.

I have spoken at countless DOE hearings over the years, going back to the early 1980's, about the "destructive program," which is the work that goes on at Los Alamos.

1|2F I know that the hearings are a sham, just like dissent is scribed into sound bites, if at all, our testimony is mocked tonight by the two-minute limit, and more importantly, by a process of decision-making where "the beast" makes the frame around citizen imput. Only certain questions make it into the analysis. Moral questions? No. Its true cost, to a country bankrupt

National Nuclear Security Adm

bureaucracies we can't vote out, confined, as we are, to comment for today like this one tonight,

Hibbs, Linda
Page 2 of 2

both morally and economically by preparations for war and by war? No.

2|16A Even the name "Complex Transformation" makes a mockery, transformation of "what"? Is it our demise as a human species, as we exist more and more in planetary hospice? Today's example, "Collapse of Salmon Stocks Endangers Pacific Fishery" in today's New York Times.

3|14O There is profound dissonance in my womb, as we continue to endow this death camp, Los Alamos, for more than sixty years, with no end in sight. I am tired of the gloss, the denial, including my own denial, of the reality of blowing up bodies, penetrating their tissues with substances that poison them, causing their death or lingering illness. How does one comprehend this? One doesn't, I've decided. Unless, of course, you are a victim.

But take heart, the citizenery is becoming aroused in a new way. We are beginning to step into the awful gap in governance. Power will dwell in the concrete lives of individuals, who have begin to live together in community, at a local level, to co-create a way of life that is radically different from the agenda here tonight.

I have new confidence in that vast and wily power of individuals, in community, to apprehend, assimilate the evil in our midst, Los Alamos, and to turn government to right livelihood-- caring for the diverse, magnificent forms of life on earth.

Thank you.

Linda Hibbs
903 Don Miguel Place
Santa Fe, New Mexico
87505

Hickey, William
Page 1 of 2

PC_179

February 26, 2008

Theodore Wyka
Complex Transformation SPEIS Document Manager
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Re: Draft Complex Transformation SPEIS Comments

Dear Mr. Wyka,

1|16A When talking about building new nuclear weapons or refurbishing our current stockpile, we must consider the impact on both the smaller environment and the larger Environment. Impact to the smaller environment, i.e., impact to the health of the surrounding population, air, land, and water by Complex Transformation, is important. But it pales in comparison to the devastating and irreparably poisonous impact on the larger Environment, in which I include my grandchildren (as representative of the children of the world), international law, and our flawed and fearful human nature. What will happen if the plans for Complex Transformation are allowed to progress is that, even if we meet all the safeguards for the smaller environment (which is doubtful), we will still end up terrorizing and destroying the larger Environment.

2|14O My Grandchildren

When I was in grade school in the 1950's, we often practiced what to do in the event of a nuclear attack. We got under our school desks and cowered! Three years ago my wife and I toured the atomic bomb museum in Hiroshima, Japan, and saw school children's lunch boxes that were just fused masses of metal. School desks are no match for a nuclear holocaust. In fact, there is *no* protection. *None*. Is this the environment we want to bequeath to our grandchildren – life under the constant threat of a world so full of nuclear weapons that they can, at any moment, be simply and indiscriminately vaporized by them? One look at my grandchildren tells me that I must do everything in my power to spare them (and all the world's children) this legacy of terror. This includes trying to convince you to put an end to Complex Transformation.

International Law

3|1F 4|1J Our country has joined other nations of the world in signing the Nuclear Nonproliferation Treaty. We are bound by law to reduce and eventually eliminate all our weapons of nuclear mass destruction. How can we in good conscience disrupt and destroy this larger Environment of nuclear disarmament? We already have more nuclear weapons than the rest of the world combined. We must lead the way in ridding the world of these horrible weapons by ridding ourselves of them. To keep, increase, and extend the life of our

Hickey, William
Page 2 of 2

Theodore Wyka
Complex Transformation SPEIS Document Manager
Page 2

1|16A (cont)
3|1F (cont)

nuclear weapons while threatening other nations who want to develop them is hypocritical, immoral, and illegal. Ultimately it is also doomed to failure, because it is our very grasping after nuclear weapons that makes other nations think they need to have them as well. The Complex Transformation we need is one that will *dismantle* our nuclear arsenal rather than extend it.

Our Flawed and Fearful Human Nature

The temptation to enforce our "national security interests" and protect our "way of life" with military might (including the use of nuclear weapons) is too great to resist. Sadly, we know this because we are the only country that has used these weapons of mass destruction, and because we have, more recently, asserted our right to wage *preemptive* warfare. We simply can't be trusted with these weapons that can obliterate our planet. Nobody can.

We deceive ourselves if we think we will never again use these terrifying weapons. In House of War, James Carroll notes that although there can be no victor in a nuclear war, in 1960 the head of our Strategic Air Command, Thomas Power, actually defined victory by saying, "At the end of the war, if there are two Americans and one Russian, we win." I fear there are still some among us who think they will be able to find victory in a nuclear wasteland.

No less a cold warrior than George Kennan had our flawed and fearful human nature in mind when he made the following eloquent plea to world leaders: "For the love of God, for the love of your children, and of the civilization to which you belong, cease this madness. You are mortal men. You are capable of error. You have no right to hold in your hands – there is no one wise enough and strong enough to hold in his hands – destructive power sufficient to put an end to civilized life on a great portion of our planet." *Boston Globe*, March 18, 2005, D23.

1|16A (cont.)

In summary, the three above cornerstones of the larger Environment will never support, nor ultimately survive, the impact of Complex Transformation. As a grandfather, as a citizen of a nation of laws, and as a follower of Jesus who dared to call our flawed and fearful selves to put away the sword and to love even our enemies, I urge you to end all such plans and activities now!

Sincerely,

William Hickey
20445 Briarcliff Rd.
Detroit, MI 48221
(313) 862-6962

Higginbotham, Vernon
Page 1 of 1

PC_2138

Levens, Matthew

From: Vernon Higginbotham [vernonhi@yahooo.com]
Sent: Wednesday, April 16, 2008 8:09PM
To: Complex2030
Subject: National defense

Vernon Higginbotham
2645 E. Southern Ave., A163
Tempe, AZ 85282-7602

April 16, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A

I understand that the administration has asked for funds allowing it to restart the U,S.'s nuclear weapons program. New nuclear weapons will not make us safer, will increase our debt, and deprive our nation of funds to meet domestic needs.

I urge you to oppose funding for new and/or additional nuclear weapons.

Sincerely,

Vernon L. Higginbotham
480 8313409

Hildebrant, Andrea

Page 1 of 1

PC_362

Levens, Matthew

From: Andrea Hildebrandt [amhoutdoors@aol.com]
Sent: Thursday, February 14, 2008 9:15 PM
To: Complex2030
Subject: Citizen Comment regarding SPEIS, Complex Transformation

Mr. Wyka:
1|16A Stop this terrible waste of money and technology. Moreover, do the RIGHT thing, and stop the building of weapons of mass distruction that will be distructive for generations to come.
NO MORE NUCLEAR WEAPONS!!

Andrea Hildebrandt
7251 Bingham Ave
Dearborn, MI 48126

1

Hill, Amanda

Page 1 of 1

PC_1275

Levens, Matthew

From: Amanda Hill [ahill@wand.org]
Sent: Tuesday, April 08, 2008 4:37 PM
To: Complex2030
Subject: Reject "Complex Transformation" plan to build nuclear weapons

Amanda Hill
989 Winburn Dr
East Point, GA 30344-2852

April 8, 2008

Theodore A Wyka
Complex 2030 SEIS Document Manager
Office of Transformation, U.S. Department of Energy, NA–10.1 1000 Independence Avenue, SW.
Washington, DC 20585

Dear Theodore Wyka:

1|16A The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal.

2|9B It is an absolute outrage that the US Department of Energy is spending an insane amount of money on nuclear weapons when we have so many unmet needs in the US and in the world.

3|9H Complex Transformation is expected to cost upward of $150 billion and is a complete and utter waste of taxpayer money. Revamping the current arsenal will lead to renewed nuclear tests worldwide which very unstable state right now. The US nuclear weapons development
4|1J has done nothing for our security and has led to nothing but a massive amount of toxic, radioactive waste that has harmed so many workers, so many people in surrounding
5|14O communities and had horrific impact on the enviroment as well.

6|20 I question :
HOW DO ALL OF YOU SLEEP ? HOW DO YOU RATIONALIZE THE INDUSTRY THAT YOU WORK FOR?

Greed.

1|16A Cont. STOP THE BOMPLEX,
7|7J CLEAN UP THE MESS YOU'VE MADE ...

6|20 Cont. I hope that all people seek to gain a better understanding of what their experiences teach them and choose a better path.

Thanks for listening.

4|1J Cont. By building up its nuclear arsenal right now, the US is essentially telling the world, "Do as I say, not as I do."

Sincerely,

Amanda Hill
4045245999

1

Hiller, Stephanie

Page 1 of 1

PC_1542

Levens, Matthew

From: Stephanie Hiller [hiller.stephanie@gmail.com]
Sent: Tuesday, April 29, 2008 6:22 PM
To: Complex2030
Subject: The Preferred Alternative

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager,
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, D.C. 20585

Dear Mr. Wyka and NNSA,

1|7O My preferred alternative for Complex Transformation would be to phase out nuclear weapons production entirely and dismantle all existing nuclear weapons.

Nuclear weapons are too dangerous and too unwieldy to be used again. Their consequences are too ugly to contemplate. The future of our life on this planet is at stake.

2|16A

Further, the production of nuclear weapons, and the running of nuclear power plants, is gradually
3|14O and inexorably contaminating our land and water with radioactive materials while producing enormous and growing amounts of nuclear waste for which we have no appropriate method of disposal.

Surely you do not wish to be a part of this folly! If you and all your colleagues would act according to your conscience, the problem of nuclear weapons would soon be solved. Your courage and heroism would be rewarded when the vast resources of American technology are turned toward productive and useful activities.

Thank you,
Stephanie Hiller

--
Stephanie Hiller
writer and editor

Founder
Women for a Better World
P O Box 4342
Albuquerque NM 87196

5/16/2008

Hills, Mary

Page 1 of 1

PC_1466

Levens, Matthew

From: Mary Hills [mehills@cfl.rr.com]
Sent: Thursday, April 17, 2008 4:56 PM
To: Complex2030
Subject: nuclear weapons

Mary Hills
5735 Stewart Ave
Port Orange, FL 32127-4703

April 17, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

My name is Mary Hills. I have lived in Florida for 36 years. When an effort was made to send nuclear weapons into space, I joined the protest group at Daytona and marched with them to the Cape. (Dr. Spock, the famous baby doctor, was a participant in this march.)

1|7O

My hope for our world is that we can learn to live in peace with all people. For that to happen our leaders must be willing to negotiate with other countries and to join in international efforts to abandon the option of nuclear warfare.

How can we in good conscience demand that other countries cease efforts to develop nuclear
2|1J weapons while we are creating and producing them ourselves? The only way to save our planet is to make every effort to do away with warfare as a means of settling differences.

I hope I will live to see the day that the United States will be a country that can be trusted and looked up to as a leader in making our world a safe and caring place for ALL
3|16A people everywhere.

Will you please help us move toward the day when we will be able to "beat our swords into plowshares" and "study war no more"?

Thank you,

Sincerely,

Mary Hills
3867882299

1

Hilt, Lance
Page 1 of 1

PC_278

26 March 08

TO: Mr. Theodore Wyka
Office of Transformation, NA-10.1
U.S. Dept. of Energy/NNSA
1000 Independence Ave, SW
Washington, D.C. 20585

Re: Complex Transformation

Dear Mr. Wyka,

Thank you for accepting comments re Complex Transformation. Please know that I oppose this proposed nuclear weapons manufacturing facility and I urge you to uphold the NPT.

1|16A
2|1F

Sincerely,

Jance Hilt

2800 Dead Indian Memorial Rd.
Ashland, OR 97520

Hinos, Evert
Page 1 of 1

PC_875

Levens, Matthew

From: EVERT HINOS [mrglasscars@yahoo.com]
Sent: Thursday, March 27, 2008 4:19 PM
To: Complex2030
Subject: NUCLEAR MONEY

EVERT HINOS
PO BOX 412
CYPRESS, CA 90630-0412

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|9B
2|7J
NO MORE MONEY FOR ANY NUCLEAR WEAPONS OR POWER PLANTS, ONLY TO CLEAN UP THE MESS THAT HAS BEEN MADE ALREADY.

A TRUELY CONCERNED AMERICAN

EVERT HINOS

1

Hinsley, Joyce
Page 1 of 2

PC_104 Joyce Hinsley – Pantex hearing – afternoon

Statement for the DOE/NSSA
Complex Transformation Hearing
Amarillo, Texas
February 28, 2008

My name is Joyce Hinsley. I am a 67-year-old retired teacher and a lifelong resident of Amarillo. I taught in the Modern Language Department at Amarillo College for a total of 41 years. I grew up in the early years of the nuclear age when we naively believed that it might be possible to shield school children from the horrors of a nuclear attack by having them take shelter under their desks. I remember vividly the fears and anxiety of my early twenties when our country awaited the outcome of the Cuban missile crisis. At that time I had only a glimmer of understanding of what nuclear war might entail, but I did understand enough to know that life on this planet would never be the same if it should occur. That was in the days when only two main powers controlled the stockpiles of nuclear weapons, when deterrence was possible because the leaders of both the Soviet Union and the United States knew that whichever country attacked first would itself be annihilated.

Since I first heard of the proposed transformation of the US nuclear weapons complex, I have wanted to learn more about it and to have an opportunity to express my opinion. I was glad to learn that much of our nuclear stockpile would be dismantled and that the overall configuration of the complex would be reduced. However, I was alarmed upon learning of the intention to rebuild a number of weapons to produce a so-called Reliable Replacement Warhead. Though Congress did not fund this particular proposal in the last session, indications are that other attempts will be made to secure funding for development of the RRW. This is definitely <u>not</u> the way to reduce the danger of a nuclear attack upon the United States. Indeed, such activity would be seen by other countries, particularly by our enemies, as a direct violation of the terms of the Nuclear Non-Proliferation Treaty. It would provide the rationale for them to do the same. Too often in today's world the U. S. is perceived, not as a peace-loving country trying to resolve world problems, but as a bully pursuing its own agenda, looking out for its own self-interest, regardless of the harm we may do to other countries in the process. Our continuing to modify and redesign our own nuclear stockpile will only reinforce that negative perception of us.

1|8A
2|13A.1
3|1F
4|1J

In the mid- 1980s Presidents Reagan and Gorbachev were in agreement that the only sure remedy was the complete elimination of all nuclear weapons. Unfortunately, they were unable to agree on how that should be accomplished; it didn't happen. Today, in 2008, some fifty countries possess such weapons or have the technology to be able to produce them. It is insane to think that continuing to develop new weapons can solve the problem. We merely increase the likelihood that some rogue nation or terrorist faction will succeed in obtaining or manufacturing such weapons and will unleash them upon us without stopping to consider possible consequences.

4|1J (cont.)
2|13A.1 (cont.)

In addition to the ever-increasing likelihood of a terrorist attack on the U. S. involving nuclear weapons, another factor that <u>must</u> receive consideration is the harm being inflicted upon the environment. We all know that such damage has already occurred at Rocky Flats, Los Alamos, and other locations, and there has been contamination of perched aquifers here near Pantex. It is inevitable that eventually even worse, possibly irremediable, damage will occur if we continue research and development of new nuclear weapons. What would be the consequences to our area and to the entire United States should the Ogallala Aquifer, which underlies a great part of the "breadbasket of the U.S.," become contaminated? Life as we know it in this area is already endangered by the progressive depletion of this valuable resource that cannot easily be recharged. We cannot continue to take for granted that it will always be available to us. We must begin to take active steps to ensure its preservation and conservation. Continued nuclear weapons development flies in the face of this goal.

5|14O

6|14E

Hinsley, Joyce
Page 2 of 2

A World Opinion poll of 2007 showed that 73% of Americans support the goal of achieving a nuclear- weapons-free world. The United States should take the lead in this initiative by renouncing the development of new nuclear weapons and by ratifying the Comprehensive Test Ban Treaty. Through diplomacy and negotiation we must attempt to convince other countries to work toward the goal of a nuclear-weapons –free world. The ultimate survival of civilization as we know it, perhaps even of the world itself, depends upon it.

7|1E
4|1J (cont.)

Hirano, Pierre

Page 1 of 1

PC_898

Levens, Matthew

From: hiranop@msn.com
Sent: Friday, April 11, 2008 12:33 AM
To: Complex2030
Subject: SPEIS

After attending the public hear in Santa Fe last month, I realized that NNSA will proceed to built more nuclear weapons capacity at Los Alamos despite many concerns expressed by by citizens regarding safeguarding water supplies and humanity in general.

1|14O As a concerned citizen, retired environmental engineer and tax payer I would suggest the building new pits for our nuclear arsenal is not what Los Alamos should be doing.

2|10B Potential water and air pollution from these activities so close to Santa Fe is a major concern that will not be readily resolved. The nuclear waste issues from the production of pits are significant hurdles that must be overcome. The human health risks have not been fully assessed by your EIS. The proposal for producing pits seems to me to be the height of human folly, not to mention arrogance that technology will solve such grave issues. Thus I would suggest that such activities if they must be done(a big question indeed) be done in uninhabited eternally "sacrificiable" areas such as in the Nevada desert. Instead Los Alamos should become the center of excellence for disassembling pits and a major player in nuclear disarmament. There is no place for nuclear armament at Los Alamos. I appreciate the opportunity to comment.
Pierre Hirano

1

Hirose, Mary

Page 1 of 1

PC_1810

Levens, Matthew

From: Mary Hirose [wearejedi@aol.com]
Sent: Wednesday, April 02, 2008 5:01 AM
To: Complex2030
Subject: No more 'Nukes!'

Mary Hirose
1774 Westbury Drive
Hoffman Estates, IL 60192-1042

April 2, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|1K I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

2|16A I am also opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal.

Please, it's time to make the planet more safe, not less!

Sincerely,

Mary Hirose
847 934-5490

1

Hirsch, Michael
Page 1 of 1

PC_2064

Levens, Matthew

From: Michael Hirsch [mmh@pipeline.com]
Sent: Tuesday, April 29, 2008 4:26 PM
To: Complex2030
Subject: Oppose any more investment in nuclear arms

Michael Hirsch
655 E 14 Street, #3E
New York, NY 10009-3142

April 29, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

Dear Friend,

1|1K; 2|16A I cannot believe that the Bush administratior is proposing the construction of facilities for the production of nuclear arms. This insanity has to end. Please step up and be a leader in ensuring that the bill doesn't ever come to the floor of Congress, or, if it does, that you will rail against it.

I was in high school in 1962, during the Cuban missle crisis. I remember how fearful we all were that destruction and death were imminent. For the last few years I've come to believe that, whatever is wrong in the world, we were no longer facing a mass nuclear suicide, which is a good thing. I have two teenage daughters, who didn't grow thinking they could be extinguished because statesmen didn't know how to lead, except over a cliff. We also live in Manhattan, near a power plant. Any nuclear exchange and they are dead. So please, do what you can to stop the madness. We're better than this.

Sincerely,

Michael Hirsch
2126774852

Hitow, Rachel
Page 1 of 1

PC_1072

March, 25, 2008

My name is Rachel Hitow and I am an undergraduate student at American University, as well as an intern for the Nuclear Age Peace Foundation.

1|1K The Bush Administration's rhetoric towards Iran is consistently laced with notions of our "freedom," their "terror," and the phrase, "all options on the table." This rhetoric on its own is tricky enough to understand and justify, but becomes all the more confusing when you try to understand the administration's policy towards Iran *and* the Department of Energy's proposal for Complex Transformation.

In December 2007, President Bush said, "Look, Iran was dangerous, Iran is dangerous, and Iran will be dangerous, if they have the knowledge necessary to make a nuclear weapon." Bush says Iran will be dangerous by simply possessing the no-how to make nuclear weapons. This makes me wonder how Iran and the rest of the world feel about the Department of Energy asking to revamp the US' entire nuclear weapons complex.

2|1J How can the United States continuously threaten Iran for taking steps toward a first nuclear weapon, when the Department of Energy is openly asking Congress to fund steps towards the construction of more sophisticated nuclear weapons facilities? How is it justifiable for the US to consider "surgical strikes" against Iran for having one centrifuge tainted with weapons-grade enriched Uranium, when the US Department of Energy is requesting the construction of entire buildings that will churn out new and better nukes at a moments notice? How can the US ask the rest of the world to maintain the fragile balance of non-proliferation, when the US Department of Energy aims to place more weight on the already tipped scale of nuclear threats?

If I were Iran, North Korea, or any of the other nations in the so-called axis of evil, I would hear the Bush administration's threatening rhetoric, look at the US' already gigantic stockpile of nuclear weapons, and the DOE's proposal to create new, modernized weapons plants, and then I would form urgent search-parties to seek out as many centrifuges and as much yellow-cake uranium as possible.

Instead of giving these nations legitimate excuses to build nuclear weapons of their own, the US should lead the world in a disarmament race to see who can get rid of their nukes the fastest. The prize – no nuclear annihilation for all!

Rachel Hitow
2615 42nd St., NW
Apt. 303
Washington, DC 20007

Hnidak, J
Page 1 of 1

PC_196

1|9H
2|16A
3|1J

I am a Unitarian Universalist. Our 7th Principle is respect for the interdependent web of all existence, of which we are all a part. For this reason, I am morally opposed to spending $150 billion in taxpayer money to build new nuclear bombs. We already have enough nuclear weapons to destroy the world 8 times. Enough is enough. Our country should be leading negotiations to reduce and eliminate all nuclear weapons.

J. C. Hnidak

12625 Osage Street
Amarillo, Tx 79118

Hobart, David
Page 1 of 3

PC_438

Buenaflor, Justin

From: David Hobart [dhobart@lanl.gov]
Sent: Thursday, March 13, 2008 6:14 PM
To: Complex2030
Cc: mneu@lanl.gov; dlclark@lanl.gov; wong@lanl.gov
Subject: Essay on Complex Transformation
Attachments: COMPLEX TRANSFORMATION Essay DEH.doc

5/1/2008

Hobart, David
Page 2 of 3

PC_438

COMPLEX TRANSFORMATION:
CHANGING A DINOSAUR INTO A CHAMELEON

When the bow and arrow was invented, I am sure it was perceived as a devastating weapon that could be used for defense or aggression. It could also be used to supply food. If the tribe over the hill had bow and arrow technology and your tribe did not, then there was a major imbalance of power and you most likely were at a very serious disadvantage. On the other hand, if the tribe over the hill knew that your tribe also had bow and arrow technology, they would be much less likely to attack, fearing "mutually assured destruction." Now fast-forward to the 21st century, where the bow and arrow has been replaced by nuclear technology, which can be used for defense or aggression. It can also be used to supply energy, which supplies food, transportation, entertainment, etc.

Every new discovery has the potential to be used for good or evil, the definition of which may depend on which side of the hill that you reside. We Americans feel strongly that we are on the "good" side in that our form of government is based on attempting to correct the mistakes of thousands of years of previous governments—governments that suppressed the human spirit and curtailed inalienable human rights, such as religious beliefs, free press, and the right to bear arms. The arms in our national defense are the "big guns" of nuclear weapons. The US has used nuclear weapons in war on only one occasion in WWII, resulting in the total destruction of two cities in Japan. This act, devastating as it may have been, prevented the necessity of an all-out ground invasion of Japan and saved the lives of many, on both sides. There was a time during the Cold War that we were on the brink of all-out nuclear war with the Soviet Union, but sanity prevailed and the reality of mutually assured destruction prevented Armageddon.

Times have changed, as they usually do, and the Cold War is over. The threat of all-out global thermonuclear war has diminished. However, a new nuclear threat has appeared on the world stage. This threat is a result of nuclear proliferation and actions by radical groups not necessarily associated with any country or province. The goal of these groups is not gaining territory or wealth, but sheer terror, mayhem, murder, and destruction. Sometimes the motivation is clear but often not. Maybe the reason is radical religious zealotry or simply to strike fear in an enemy. Whatever the reason, this fanatic behavior threatens global security. We must maintain an inventory of nuclear weapons for self-defense—but a much smaller number and most likely a different kind for potentially more diverse missions. So this is the reason behind the US Government's goals of transforming the complex to a smaller size at less cost, while still maintaining a strong national posture to defend America in an ever-changing world. Consequently, the demand for the prime ingredients of nuclear weapons, namely special nuclear materials, has been reduced. The cost of safeguarding these materials and the consequences and liability of their falling into the wrong hands are disturbingly high.

1|13A.1

The science and technology to attain these goals is not an insignificant effort. The best possible use of the excess nuclear material is in turning "swords into plowshares"—that is, making mixed-oxide (MOX) fuels to burn in nuclear power reactors. Furthermore, the US needs to seriously reconsider the reprocessing of nuclear materials. During and after

2|5I
3|5J
4|5L

Hobart, David
Page 3 of 3

PC_438

President Jimmy Carter's term, reprocessing was feared because it was considered a possible means of proliferation. The reduced nuclear weapons stockpile, the ever-increasing backlog of nuclear waste, the impending energy crisis, and the potential impact to the environment all dictate a reconsideration of nuclear waste reprocessing.

2|5I (cont)
3|5J (cont)
4|5L (cont.)

Going down this path will necessitate a revitalization of actinide science and technology. The scientific resources and expertise freed up by making fewer weapons can quite effectively be used to address many related sociopolitical global issues such as stockpile stewardship, nuclear incident response, nuclear forensics, and counter-proliferation.

5|9B

I strongly support the Complex Transformation for the reasons outlined above, and I hope that these comments will be considered for inclusion in the record of decision. We must endeavor to transform the lumbering and obsolete Cold War dinosaur into a 21st century agile dynamic chameleon. A chameleon, after all, can change color quickly in response to a rapidly changing environment!

6|15A

David E. Hobart, Ph.D.
U.S. Citizen
U.S. Air Force Veteran

Hochstein, May
Page 1 of 1

Dear Sir: February 28, 2008

These Complex 20/30 hearings are about issues of life and death which people of faith must respond to, since they are ultimately about morality. In 1998, 105 Catholic bishops issued an historic statement rejecting nuclear deterrence and calling for a treaty to outlaw nuclear weapons, just as biological and chemical weapons have been outlawed.

1|9B These Bishops, and many religious leaders of other denominations, have long opposed the possession of nuclear weapons, their continued development, testing, deployment and threatened use, as a sinful affront to any moral order and a theft from the billions of people in our world who daily struggle to find dignity and life amidst devastating and dehumanizing poverty. That poverty is exacerbated greatly by the spending of obscene amounts of earthly treasure on useless horror weapons of mass destruction.

Complex 20/30 is an attempt to upgrade the whole US nuclear weapons complex with $150 billion to ensure the usability and enduring role of these immoral weapons for the indefinite future. We are morally bankrupt when we spend so much of our gifts from God on dubious security. Our greatest security and strength comes from sharing with the poor and building a world of trust and mutual support and development. We must put all our effort into ridding the world of these weapons. It can be done, say scientists and political experts of all kinds. It must be done, say people of moral integrity.

2|16A I speak to those who have the great responsibility of this Complex 20/30 decision. Find the courage to say no to this outrage. I know you are under great pressure. You are also called to greatness at this moment, the greatness that will be remembered for generations, the greatness that leaders of the past rose to when they made decisions that benefited the whole world, like the birth of the UN, the treaties against torture and for human rights and against atmospheric nuclear testing, etc. Please take stock of your influence on our future. May God guide you in your momentous and morally serious decision. May God approve of your choice.

Sincerely, May Hochstein

May Hochstein
5113 SW 16th
Amarillo, TX 79106

Hoff, Marilyn
Page 1 of 2

PC_1031

Statement in Opposition to Plutonium Pit Manufacture at LANL
by Marilyn Hoff, PO Box 295, El Prado, NM 87529

I was born at about the same time as the Manhattan project. I'm only a little older than nuclear weapons. My whole life has been lived in a world continually in danger of annihilation because of the strange fruits of Los Alamos. My generation and all who follow have never known the comfort of presuming our precious world will always be here.

Nuclear weapons represent the triumph of dishonor in modern warfare that increasingly targets innocent civilians. Past wars however hypocritically at least pretended that killing would be limited to combatants. But nothing kills more indiscriminately than nuclear weapons. The indiscriminate killing of civilians for political ends is the veritable definition of terrorism. 1|14O

The culmination of this barbaric trend is the present US push for so-called usable nukes, whose new treaty-violating design necessitates a new design of plutonium pits. Thus a push for plutonium pit manufacture here at LANL is a push for actually employing these usable weapons from hell, a promotion of unthinkable acts of terrorism perpetrated in our names. Wholesale murder, commonly shrugged off as collateral damage, is now the unspoken but actual aim of this latest nuclear boondoggle.

Plutonium, the raw material of this dark scheme, is the most dangerous element on earth. Too much of it too close together in one place can accidentally go critical, killing anyone nearby. The plutonium plant at Rocky Flats had no sprinkler system, because officials feared that plutonium could go critical in the presence of water. Plutonium is extremely chemically reactive. Pure plutonium waste will bond with almost anything, including the barrels in which it is stored, corroding them away until they leak; or expanding as it bonds, it can make containers burst. It bonds most readily with oxygen, making it more flammable than a match. Plutonium is pyrophoric, meaning in certain shapes and sizes it can spontaneously ignite in the presence of air.

The Atomic Energy Commission actually instructed the workers at Rocky Flats to "expect to have fires." Rocky Flats, whose pit manufacturing equipment now resides at LANL, played host to hundreds of plutonium fires, according to Len Ackland in his book, *Making a Real Killing*. Plutonium burns hot enough to melt steel. Burning converts it to a fume of particles light enough to behave as a gas and easily inhaled to the depths of your lungs, where if it remains it is almost certain to cause cancer. One five hundred billionth of a gram of plutonium was labeled a serious health risk by even lenient regulators during the lax oversight of Rocky Flats in the days of the nuclear arms race. 2|14M3

Like what happened during the major plutonium fire that barely averted disaster at Rocky Flats in 1957, a plutonium fire gotten out of hand, threatening criticality in the presence of water, burning even faster in the presence of most other fire retardants, can actually burn up the filters installed to protect the neighborhood from plutonium releases, and as happened then, radioactive plutonium smoke can billow out the chimneys and into the world.

How did that 1957 fire start? "A storage box in the middle of the room's glove box system held about 22 pounds of plutonium in six different containers. One steel can held plutonium "skull," a thin film left over from the mold where the molten metal was cast. Sometime before 10 P.M., the plutonium skull ignited spontaneously."

The nuclear arms race is an idea whose time is past. In this increasingly lawless world it must not be restarted. Those who profit by it do so at the expense of you and me, who provide their taxpayer funded subsidies. By law, we and not they are most liable for their accidents,

Santa Fe, NM

Hoff, Marilyn
Page 2 of 2

3|9H 4|9B 5|16A

which gives them little incentive to operate with care. I do not want my money spent on this murderous and polluting purpose. I do not want my neighbors and myself to live in fear of plutonium contamination and in expectation of early cancer deaths. I want my money spent not on state terrorism, but on clean energy, global warming, disease, famine, planetary clean-up, and clean-up of the poisonous mess that is LANL.

I oppose all alternatives proposed by the NNSA that would entail the manufacture of plutonium pits at Los Alamos National Laboratory or any other activity that would facilitate the treaty-violating design, testing or manufacture of new nuclear bomb designs, including nuclear bunker busters and any other so-called usable nukes. As long as we keep on violating treaties and designing new nukes in our own aggressive nation, with its designs on the resources of other more defenseless countries, every threatened country in self-defense will strive to acquire nukes of its own. Not in my back yard should a plutonium pit factory ever operate. Not in anybody's back yard, anywhere on earth, ever again.

Hoffman, Margaret
Page 1 of 1

PC_619

Levens, Matthew

From: Margaret Hoffman [Margaret.Hoffman@SNDdeN.org]
Sent: Friday, April 04, 2008 12:21 PM
To: Complex2030
Subject: Commentary on Complex Transformation SPEIS

To: Theodore A. Wyka
Complex Transformation Draft SPEIS
Document Manager

Dear Mr: Wyka:
I am a Sister of Notre Dame de Namur in communications located in Belmont, California, and a member of an international community of Sisters of Notre Dame. We serve in the United States, Japan, Latin America, Europe and Africa. Our California Sisters long ago (1979) took a corporate stance in favor of nuclear disarmament. Our Japanese Sisters and their families suffered in the bombing of Hiroshima at the end of World War !!. This brought home to us the terrible carnage from nuclear weapons that put civilians as well as combatants at risk. I visited Hiroshima and learned to my horror that teenagers from the nearby villages had been brought into the city to clear debris from fear of incendiary bombs, so that the greatest number of casualties that terrible day were children and their teachers!

1|1F With the Nuclear Non-Proliferation Treaty we were supposedly on the way toward disarmament. Now the Department of Energy presents us with this Complex Transformation plan which involves new plutonium pit production, expansion of US weapons production facilities, and the constuction of the RRW, a new series of nuclear weapons. This becomes a threat that could initiate a new weapons race. It can destroy the whole move toward a disarmed globe. By a logic I have never understood we, the first country to produce and use a nuclear weapon, consider ourselves justified in demanding that others not use the same weaponry.

2|1J A few years back I visited Livermore lab with a Pax Christi group, including Bishop Thomas Gumbleton and with members of a local group, TriValley Cares. What I saw and heard on that trip did not set my mind at ease. The experience was chilling. Now I learn that Livermore will be doing designing of the RRW series of weaponry. I fear that if this plan is approved, not only will it be a huge waste of money and talent, but it could spell the ultimate destruction of this planet.

3|16A It is significant that such former leaders as Henry Kissinger, George Schultz, and Sam Nunn are now advocating the desirability and the possibility of a world without nuclear weapons. We are aware that we are certainly not alone in the religious community in our opposition to this change in mission under the guise of consolidation. We hear nothing about how our policies and decisions lead other nations to fear and distrust us. We hear very little these days about negotiation to avert wars; very little about political solutions, and too much about terrorism, a missile shield, and now a new generation of nuclear weapons to keep us "safe". We say no to this misguided search for safety; yes to greater honesty about the behaviour of our own nation; yes to alternative constructive modes for seeking true peace.

Margaret Hoffman SND
Communications Director
Sisters of Notre Dame de Namur of California 1520 Ralston Avenue Belmont, CA 94002

650-593-2045: ext.259
margaret.hoffman@sndden.org
www.snddenca.org

1

Hogsett, Vic
Page 1 of 1

PC_1508

Buenaflor, Delight

From: Vic Hogsett [vic@lanl.gov]
Sent: Thursday, April 10, 2008 8:49 AM
To: DIV.Complex.Transformation
Subject: Form posted from Microsoft Internet Explorer.

Reviewed for classification and found to be UNCLASSIFIED

Last Name=Hogsett
First Name=V.H.
Email Address=vic@lanl.gov
Street Address=464 cr 84
City=Santa Fe
State=NM
ZIP Code=87506
Comments=It is more important to clean up the legacy waste at Los Alamos, restore the environment, and discover new science than it is to continue pit production. Although, in my opinion, we do not need a new nuclear arsenal, we do need a clean environment and we need new energy sources and fundamental science for future economic base. DOE is wasting money on rebuilding the nuclear weapon complex and missing opportunity to invigorate the national economy through promotion of basic science and energy technology development. Further, I believe that pit production should be sent to facilities already existing to best handle it, namely in Texas.

1|9B
2|16A

1

Hogue, Gregory
Page 1 of 6

PC_374

United States Department of the Interior
OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Richard B. Russell Federal Building
75 Spring Street, S.W.
Atlanta, Georgia 30303

TAKE PRIDE IN AMERICA

ER 08/45
9043.1

April 4, 2008

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, D.C. 20585

RE: Draft Supplemental Programmatic Environmental Impact Statement (SPEIS) for Complex Transformation to Make the U.S. Nuclear Weapons Complex Smaller and Secure in California, Missouri, Nevada, New Mexico, South Carolina, Tennessee, and Texas

Dear Mr. Wyka:

The Department of the Interior offers these comments on the referenced SPEIS. This document analyzes the potential environmental impacts of several alternatives of a nationwide effort to make the U.S. nuclear weapons complex more secure and more responsive to the changes following the end of the Cold War and the cessation of U.S. nuclear weapons testing in the decade of the 1990s.

1|7N
2|15A
3|5F

The SPEIS identifies reasonable alternatives to continue transformation of the Nation's nuclear weapons complex to be smaller and more responsive, efficient, and secure in order to meet national security requirements. We agree that the programmatic preferred alternative of pursuing Distributed Centers of Excellence (DCE) would have fewer adverse environmental impacts than the Consolidated Centers of Excellence (CCE), an alternative that could result in the loss of as much as 545 acres of terrestrial habitat at one site. However, the only programmatic alternative that would actually reduce existing impacts of the nuclear weapons complex on the Nation's natural resources is Programmatic Alternative 3: Capability-Based Alternative. This alternative would result in significant reductions in waste generation, including approximately 50 per cent reduction in low level waste (LLW) at the Savannah River Site (SRS). Annual operation requirements and waste volumes would be reduced from even the No Action Alternative. We recommend that consideration be given to Programmatic Alternative 3 as the preferred alternative. We concur with the project-specific preferred alternatives regarding restructuring Research and Development (R&D) and Testing Facilities.

Hogue, Gregory
Page 2 of 6

SAVANNAH RIVER SITE COMMENTS

4|10H2

We would not support the construction of either the DCE or CCE facilities at the Savannah River Site in Aiken, South Carolina. The SRS has approximately 198,000 acres within its administrative boundaries. Only 12 percent or about 24,000 acres are used for nuclear processing purposes, while 9 percent or about 18,400 acres are in areas set aside for ecological research. Another 14,000 acres (7 percent), including the Lower Three Runs Creek and Savannah River swamp forests, are left undisturbed to limit movement of trace radioactive contaminants. The remaining area is actively managed to meet conservation and restoration objectives, to provide research and education opportunities and to generate revenue from the sale of forest products. These include pine and hardwood saw timber, pulpwood and pine straw. In terms of broad forest types, the forests are about 31 percent hardwood or mixed pine hardwood and 69 percent pine.

Wetlands on the SRS encompass approximately 49,030 acres (over 20 percent of the SRS area) and are extensively and widely distributed. These wetlands include bottomland hardwood forests, cypress-tupelo swamp forests, floodplains, creeks, impoundments, and over 370 isolated upland Carolina bays and wetland depressions. A major wetland area is the Savannah River swamp that borders the Savannah River and covers about 19 square miles of SRS. Man-made ponds support populations of bass and sunfish. Commercial and recreational fish species include American shad, hickory shad, striped bass, largemouth bass, chain pickerel, crappie, bream, sunfish, and catfish.

Some SRS surface waters are classified as Category I resources, waters that are defined by the Department of Interior as unique and irreplaceable on a national or eco-regional basis. These areas include Carolina bays and cypress-tupelo swamps. Any surface waters supporting species of concern and areas containing high-quality wetlands or headwater streams (e.g., portions of Upper Three Runs Creek) would also be considered for Category I status.

The University of South Carolina, the Philadelphia Academy of Sciences, and the University of Georgia conducted extensive surveys of SRS's flora and fauna during the 1950's. Research activities and monitoring of operations have added additional resource information over the past half century, contributing greatly to the value of the site to provide research and education opportunities. Despite past land use activities, SRS today is one of the most biologically diverse areas in the Southeast. About 260 species of birds, 60 species of reptiles, 40 species of amphibians, 80 species of freshwater fish, and 50 species of mammals exist on site. Over 1,300 species of vascular plants have been collected at SRS, including the possible recent discovery of a new orchid species. The Upper Three Runs Creek supports some of the highest known numbers of macroinvertebrate species in the United States.

In 2006, the Fish and Wildlife Service conducted a freshwater mussel survey in the Savannah River to determine species composition and distribution of mussels. Savannah lilliput (*Toxolasma pullus*) was observed during the survey. This species is experiencing range-wide decline and is likely to be elevated to candidate status within the next year. The population of Savannah lilliput upstream of Little Hell boat landing (Allendale County) and immediately downstream of SRS, is the largest known remaining population of this species.

Hogue, Gregory
Page 3 of 6

The SRS was designated a National Environmental Research Park (NERP) in 1972; NERPs are locations where ecological studies can be conducted without fear of uncontrolled access to a study site and where studies can be conducted on the interaction of industrial facilities and the environment. NERPs also serve as locations containing habitats where native species thrive and endangered, threatened, and sensitive plants and animals are protected. Since the 1972 NERP designation, over 2,500 scientific papers based on work done at SRS have been published. Additionally, over 25 NERP technical reports and over 200 doctoral dissertations and master's theses have been written.

4|10H2 (cont.)

Currently under construction, the new Mixed Oxide Fuel Fabrication Facility (MOX) involved harvesting 81 acres of timber, clearing and grubbing 120 acres, moving two million cubic yard of soil, unloading rock from more than 10,000 dump trucks, and placing and contouring 45,000 tons of crushed rock (150,000 total tons of rock). Also planned are the Pit Disassemble and Conversion Facility to disassemble plutonium pits and convert the resulting metal to an oxide powder and the Immobilization Facility to immobilize plutonium oxide with ceramic material. Additional major construction projects and associated facility operations could adversely affect the significant ecological, research, and educational values of SRS.

SPECIFIC COMMENTS

5|14E16

Section 4.7.5.3.1 Surface Water Quality, Page 4-283, last full paragraph, 3rd sentence: Data continues to be collected at the USGS streamflow gaging station on Salt Creek (station number 08480595) and high flows have exceeded the 88 cfs cited in the document on numerous occasions. For example, mean daily flow of 154 cfs was recorded on October 5, 2004; and mean daily flow of 144 cfs was recorded on July 5, 2007. These data are available on the Internet at http://nwis.waterdata.usgs.gov/nm/nwis/dv?cb_00060=on&format=html&begin_date=1995-08-31&end_date=2008-03-16&site_no=08480595&referred_module=sw.

An instantaneous peak streamflow of 300 cfs was recorded on September 16, 2001 (http://nwis.waterdata.usgs.gov/nm/nwis/peak?site_no=08480595&agency_cd=USGS&format=html).

6|14D5

Section 4.8.4.1.2 Ambient Air Quality: The *Environmental Report for 2006 (WSRC-TR-2008-00008)* shows significant increases in air emissions of sulfur dioxide, total particulate matter, particulate matter <10 microns, and nitrogen dioxide in 2005 versus 2004. Include Table 4-1 (page 47) from this report in this section.

Add to the last paragraph that plutonium 238 was emitted in 2005 at concentration levels above the Derived Concentration Guidelines (DCGs) at the 319-F main stack. Inclusion of Figure 4-1 in the 2006 Environmental Report referenced above would show the 10-year history of SRS annual atmospheric tritium releases.

7|14E17

Section 4.8.3.3 Water: This section states that data from the river's monitoring locations generally indicate that South Carolina's freshwater water quality standards are being met. Four Mile Branch, on SRS, is listed on South Carolina's 2008 303(d) List of Impaired Waters due to pH levels. Further, the Savannah River above, adjacent to, and below the SRS is on the impaired

Hogue, Gregory
Page 4 of 6

7|14E17 (cont.)

waters list due to mercury concentrations in fish. The Savannah River at and below SRS have a Fish Consumption Advisory due to tissue concentrations of mercury, cesium-137, and strontium-90. Surface water monitoring at SRS shows mercury concentrations in Upper Three Runs Creek and Four Mile Branch exceed the state water quality criterion by three and four orders of magnitude, respectively, and tritium concentrations in Four Mile Branch exceed criterion by an order of magnitude. Based on the data presented above, we recommend revising this section.

8|14E18

Section 4.8.5.1 Surface Water, Page 4-315: Multiple US Geological Survey (USGS) streamflow gaging stations exist on Upper Three Runs and it is not clear from the text which gaging station and period of record is being referenced. Gaging station number 02197315, Upper Three Runs at Road "A," has a drainage area of 203 square miles, which is close to the 210 square miles reported in the text. The mean of monthly discharge for the 1974-2002 period of record for this station ranges from a low of 201 cfs in July to a high of 293 cfs in March, which differs significantly from the 171.2 cfs reported in the text. It would benefit the reader if a more specific and unambiguous reference is made for the streamflow gaging data used in the assessment. Information for station number 02197315 is available on the Internet at http://waterdata.usgs.gov/nwis/monthly/?referred_module=sw&site_no=02197315&por_02197315_14=1099081,00060,14,1974-06,2002-09&format=html_table&date_format=YYYY-MM-DD&rdb_compression=file&submitted_form=parameter_selection_list.

Similar concerns about multiple stations exist for Pen Branch.

The mean of monthly discharge for the period of record for the only USGS streamflow gaging station on Steel Creek (station number 021973515) ranges from a low of 2.5 cfs in November to a high of 12 cfs in April, which is different from the 26.2 cfs reported in the text. It would benefit the reader if these references were verified. Mean monthly streamflow data for Steel Creek are available on the Internet at http://waterdata.usgs.gov/nwis/monthly/?referred_module=sw&site_no=021973515&por_021973515_15=1099122,00060,15,1986-04,2002-09&format=html_table&date_format=YYYY-MM-DD&rdb_compression=file&submitted_form=parameter_selection_list.

9|14E19

Section 4.8.5.1.1 Surface Water Quality: See above comments in **Section 4.8.3.3 Water** and please revise this section accordingly. In addition, NPDES compliance rates do not indicate that any given discharge is not significantly affecting the water quality of the receiving stream. South Carolina's Water Quality Standards allow for mixing zones, allocated impact zones where water quality criteria can be exceed as long as acutely toxic conditions are prevented, and zones of initial dilution, that minimal area of a mixing zone immediately surrounding the outfall where water quality criteria are not met, provided there is no acute toxicity to drifting organisms. Please remove the last sentence in this section.

Inclusion of Table 6-1 (page 74) in the *Environmental Report for 2006 (WSRC-TR-2008-00008)* would provide information on 2006 radioactive liquid releases from SRS, concentrations in the Savannah River below SRS, and EPA Drinking Water Maximum Contaminant Levels (MCLs).

Hogue, Gregory
Page 5 of 6

9|14E19 (cont.)

Drainage areas and streamflows listed in the third and fourth paragraphs for Upper Three Runs and Steel Creek are significantly different from those listed on the previous page and should be reconciled.

10|14E20

Section 4.8.5.2.1 Groundwater Quality: The *Environmental Report for 2006* lists 15 locations with likely outcrop points being surface waters; Table 7 from this report should be included in the SPEIS. Identified water bodies include Upper Three Runs Creek, Tims Branch, Crouch Branch, Four Mile Branch and tributaries, Mill Creek, PAR Pond tributaries, L Lake, Steel Creek, Pen Branch, Indian Graves Branch, Meyer's Branch, and the Savannah River Swamp. South Carolina's 2007 Groundwater Contamination Inventory lists 20 contaminant incidents, seven of which are reported to be discharging to surface waters. Of those 20 sites, eight are in assessment phase, eight are in monitoring/remediation/corrective action phase, and one has remediation complete; the remaining three sites, one is inactive and two have been incorporated into another groundwater operable unit. This information should be incorporated in the SPEIS.

11|14E21

Section 4.8.7.2.1 Wetlands: We want to emphasize that the SRS includes an extensive system of wetlands, including more than 370 Carolina Bays and wetland depressions.

12|14G1

Section 4.8.7.4 Threatened and Endangered Species: Bald eagle has been removed from the Federal list and Table 4.8.7-1 should show it as "Not Listed".

13|14G2

Section 4.8.7.5 Biological Monitoring and Abatement Programs: Survey results referenced here should be summarized for the SPEIS. The reference given, (SRS 2007), is not listed in the References section (Chapter 12).

14|14E22

Section 5.8 Savannah River Site: We do not concur with the SPEIS determinations regarding the impacts of constructing and operating the alternatives Consolidated Plutonium Center (CPC), Consolidated Uranium Center (CUC), Consolidated Nuclear Center (CNC), Assembly/Disassemble/High Explosives Center (A/D/HE), or Consolidated Nuclear Production Center (CNPC) relative to water resources (5.8.5) and biological resources (5.8.7). As shown in Table 5.8.5-2 (page 5-264), these alternatives would increase groundwater use from 2.3 per cent for the CPC to 9 per cent for the CNPC. These increases in groundwater withdrawal would likely result in a lower water table which, due to the recent drought, is already lower across the State. Lowering the water table could have significant adverse impacts on wetland habitats (Carolina Bays, wetland depressions, bottomland hardwoods, and other wetland types) on and adjacent to SRS. Reduction in available wetland habitats could have adverse effects on terrestrial and aquatic resources, including endangered and threatened species at SRS.

Surface waters could also be affected by reduced groundwater discharge (further reducing surface water flow volume), increased contaminant/pollutant loading from significantly increased waste generation, and increased surface runoff due to vegetation removal, soil disturbance, and increased impervious surfaces. While NPDES permits could be issued or modified and appropriate soil erosion and sediment control measures could be employed during construction, these actions would simply reduce the environmental effects of increased waste generation and increased runoff. Statements such as that on page 5-263 that "No impacts on surface water resources are expected as a result of operations at SRS" (CPC) are not supported

Hogue, Gregory
Page 6 of 6

14|14E22 (cont.) by the data. Several paragraphs above this statement is the statement that an estimated 10.5 million gallons of liquid wastes would be generated during construction; Table 5.8.14-3 shows operations of the CPC at SRS would generate 0.6 tons of liquid hazardous waste and 75,000 gal of non-hazardous liquid waste as well as mixed low level liquid waste and a significant volume of various types of solid waste. The CPC alternative has lesser environmental impacts than the other four alternatives; the CNPC facility would substantially increase LLW generation by a factor of about 4.

15|2J **Chapter 12, References, Page 12-23**: The citation for Roybal (1991) is incomplete. The correct citation is:

Roybal, E.F., 1991, Ground-water resources of Socorro County, New Mexico, U.S. Geological Survey Water Resources Investigations Report 89-4083. Available on the Internet at http://pubs.er.usgs.gov/usgspubs/wri/wri894083

Thank you for the opportunity to review and comment on this draft SPEIS. If you have any questions concerning our comments, please contact me at 404-331-4524.

Sincerely,

Gregory Hogue
Regional Environmental Officer

cc:
OEPC, Washington
OEPC, REO-ALB
OEPC, REO-DEN
OEPC, REO-OAK
FWS, Atlanta
FWS, Charleston
USGS, Reston

Holbein, Lynn
Page 1 of 1

PC_615

Levens, Matthew

From: Lynn Holbein [holbein@rcn.com]
Sent: Wednesday, March 19, 2008 6:02 PM
To: Complex2030
Subject: Cancel the Bomb-Plex!

Dear Mr. Wyka,

1|16A I urge you to cancel plans for a new Bomb-Plex (innocently called ³Complex Transformation²).

2|1F 3|1J How can we build new bomb cores, when we are signatories to the Nuclear Non-Proliferation Treaty, and when we claim we want to reduce nuclear weapons? How can we can to Iran and North Korea, ³Do as we say, not as we do?²

Most sincerely,

Lynn Holbein
holbein@rcn.com
227 Islington Rd.
Newton, MA 02466
617.244.8260

1

Holeman, Heidi

Page 1 of 1

PC_894

Levens, Matthew

From: Heidi Holeman [lewru@hotmail.com]
Sent: Thursday, March 27, 2008 2:43 PM
To: Complex2030
Subject: I oppose nuclear weapons

Heidi Holeman
443 S. Quebec Avenue
Tulsa, OK 74112-2709

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I am categorically against nuclear weapons.

2|1K I think the administration's proposal to build a plant to produce plutonium pits for nuclear weapons is a bad idea. The forethought this administration has shown has proven to be staggeringly poor over the course of their terms. They clearly have no ability to think things through and this proposal requires considerable planning and scrutiny.

3|1J Building this new plant will only aid and abet Iran in thinking that they should be autonomous in their decision making, as well. While the U.S. is asking others to forego developing nuclear arsenals, we are simultaneously trying to increase our own capacity to build new nuclear weapons.

2|1K (cont) This is irresponsible and environmentally unconscionable not to mention very, very bad foreign policy.

THINK THIS THROUGH!

3|1J (cont) Sincerely,

Heidi Holeman, Ph.D.
918-835-3196

1

Holland, Taffy

Page 1 of 1

PC_758

Levens, Matthew

From: Taffy Holland [tholland106@comcast.net]
Sent: Thursday, March 20, 2008 1:58 PM
To: Complex2030
Subject: to Theodore Wika, Department of Energy

1|16A I want to go on record as opposed to the Bush Administrations plan to spend 150 billion dollars to build a new plant to produce up to 125 nuclear warheads a year.

Please support the fight to abolish nuclear weapons. What a madness!!

Thank you

Taffy Holland
106 Whippoorwill Road
Old Lyme, CT 06371
tholland106@comcast.net

1

Hollis, Sharon

Page 1 of 1

PC_1288

Levens, Matthew

From: bobbyhollis@gmail.com
Sent: Tuesday, April 08, 2008 10:18 AM
To: Complex2030
Subject: DOE

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|16A stupid

Sincerely,
Sharon hollis
3330 highland park place
memphis, TN 38111

cc:
Representative Steve Cohen
Senator Lamar Alexander
Senator Bob Corker

1

Holmes, Steve

Page 1 of 1

PC_2115

Levens, Matthew

From: Steve Holmes [holmes6@llnl.gov]
Sent: Thursday, April 10, 2008 8:34 PM
To: Complex2030
Subject: Comments on the preferred altenative

My name is Steve Holmes and I have worked at Lawrence Livermore National Laboratory for 31.5 years.

To maintain a capability to design, develop, and produce new or adapt warheads for military requirements
S-300 and the Plutonium facility must remain operational. To solve weapon design problems, engineering and weapon designers rely on the support from in house capability
1|10C like S-300 and the Plutonium facility.

State of the art facilities are not enough, you must have the best and the brightest staff. To recruit and retain the best of the best, facility location is very important. Lawrence Livermore National Laboratory is in a great location.

To safe guard weapon designs and fabrication methods you must not locate all you experts in one place, if a plan crashes in your consclidated facility you loose your talented staff which may not be easily replaced.

Presently LLNL weapons programs are loosing talented staff and in the last 15 years have
2|18B lost capabilities very important to weapon programs. This loss in staff and capabilities must be stopped or many important weapon program will suffer greatly.

Thank you for allowing comments

Holsapple, Kevin
Page 1 of 2

03/10/08 08:21 ☎505 662 0090 LACDC ☑001

PC_22

LOS ALAMOS
Commerce & Development Corp.

190 Central Park Square, PO Box 715
Los Alamos, NM 87544
505-662-0001 (fax) 505-662-0099
lacdc@losalamos.org

Fax Cover Sheet

To: Theodore Wyka
Company Name: US DOE Complex Transformation SPEIS
Phone:
Fax: 703-931-9222
From: Kevin Holsapple
Company Name: LACDC

Number of Pages (including cover sheet): 2

Date: 3-10-08

Comments:

Holsapple, Kevin
Page 2 of 2

03/10/08 08:21 ☎505 662 0090 LACDC ☑002

LOS ALAMOS
Chamber of Commerce

109 Central Park Square, PO Box 460
Los Alamos, NM 87544
505-662-8105 (fax) 505-662-8399
chamber@losalamos.com

March 10, 2008

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy-NNSA
1000 Independence Avenue, SW
Washington, DC 20585

SUBJECT: Comment on Complex Transformation SPEIS

1|10B The Los Alamos Chamber of Commerce supports the proposed role of Los Alamos National Laboratory in the preferred alternative of NNSA's proposed Complex Transformation initiative. The Los Alamos Chamber is comprised of more than 300 member businesses and organizations, most of which are located in the Los Alamos and Northern New Mexico area. Our members employ thousands of residents of the area.

2|15A Our organization is interested in LANL conducting safe and secure operations. We are interested in our community continuing to contribute to vital national security interests. We are interested in seeing LANL capabilities and capacities being increasingly employed in solving important problems in the fields of energy security, health technologies, national security, nonproliferation, environmental technology, as well as in fundamental research that leads to advances in many fields.

We support the preferred alternative for the following reasons:

3|7N
- Consolidating and modernizing facilities, consolidating operations, and decreasing the level of activity at LANL as is proposed by the preferred alternative will enable safer and more secure nuclear operations at Los Alamos. We see this as a positive development for our community and area.
- The proposal facilitates the reduction of the nation's nuclear weapons stockpile. We believe this to be a positive direction for our community and nation.

1|10B (cont)
- The move toward a capability based deterrent and away from the need to maintain relatively larger stockpiles of weapons in order to constitute a deterrent is a positive development for our community and nation.

Please keep us informed about the progress of this SPEIS process, and don't hesitate to contact me in the event that we can clarify or provide more information about our position.

Sincerely,

Kevin Holsapple
Executive Director

Holtz, Sylvia
Page 1 of 1

PC_1550

Levens, Matthew

From: Sylvia Holtz [sylviaholtz@ca.rr.com]
Sent: Thursday, February 21, 2008 5:44 PM
To: Complex2030
Subject: Nuclear Weapons

Sylvia Holtz
3645 Tilden Ave
Los Angeles, CA 90034-6909

February 21, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A Please oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

1|16A (cont.); 2|1J Other countries must realize that plans to modify nuclear facilities across the country will make it easier for the U.S. to rebuild its nuclear arsenal. These are not messages which will help allay their fears about our intentions. I have four wonderful grandchildren. Please do not put Nuclear weapons in their futures. We must become more responsible about keeping the world safe from Nuclear Weapons. Thank you.

Sincerely,

Sylvia Holtz
310-842-4932

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Holuj, Jakub
Page 1 of 1

PC_1374

Levens, Matthew

From: Jakub Holuj [jholuj@naropa.net]
Sent: Sunday, April 13, 2008 7:01 PM
To: Complex2030
Subject: Reject "Complex Transformation" plan to build nuclear weapons

Jakub Holuj
1531 17th St
Boulder, CO 80302-6452

April 13, 2008

Theodore A Wyka
Complex 2030 SEIS Document Manager
Office of Transformation, U.S. Department of Energy, NA–10.1 1000 Independence Avenue, SW.
Washington, DC 20585

Dear Theodore Wyka:

1|16A The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal.

2|9H; 3|14O Complex Transformation is expected to cost upward of $150 billion and is a waste of taxpayer money. Revamping the current arsenal could also lead to renewed nuclear tests, provoking Iran and North Korea, and polluting our environment.

4|1J By building up its nuclear arsenal right now, the US is essentially telling the world, "Do as I say, not as I do." Investing in a project of this magnitude implies that the US will be relying on nuclear weapons as an integral part of its security strategy for decades to come. I support a 90 day extension of the public comment period to give Americans time to weigh in on this dangerous proposal.

Sincerely,

Jakub Holuj

1

Homan, Carl
Page 1 of 1

PC_430

Levens, Matthew

From: danhoman@safeplace.net
Sent: Saturday, February 23, 2008 7:32 AM
To: Complex2030
Subject: No Complex Transformation SPEIS (whatever that is)

Theodore Wyka, Complex Transformation SPEIS Manager Office of Transformation, NA-10.1 U.S. Department of Energy/NNSA Washington, DC 20585

Dear Mr. Wyka,

1|16A I vote no on "Complex Transformation", whatever that is, and anything else that involves increasing our arsenal, or even maintaining it.

2|20.0 I don't know what the U.S. needs to do or needs not to do, but I believe it's better to do as it says in the Bible, in Romans 2:17-19, "Do not repay anyone evil for evil... (and if it's) possible, as far as it depends on you, live at peace with everyone... (don't) take revenge, my friends, but leave room for God's wrath, for it is written: 'It is mine to avenge; I will repay,' says the Lord." In Proverbs 16:7, we are even promised that "When a man's ways are pleasing to the LORD, he makes even his enemies live at peace with him."

I believe that anything other than this is fundamentally flawed.

2|20.0 (cont.) I don't know what the future is for the United States, but I believe if we put so-called self-defense in front of faith, our nation will stumble and fall.

I believe the United States would be better to commit God's plan, and pursue that goal publicly. I believe this is the best way to help others to see a better way and the futility in developing nuclear weapons; or any weapons at all.

3|7O The DOE needs to abandon its Cold War mindset. The United States can and will maintain a reliable nuclear arsenal for many years and does not need to build new nuclear weapons. The focus should be on shrinking the still-oversized nuclear weapons complex and on maintaining the safety and security of existing weapons as the size of our nuclear stockpile is reduced.

Sincerely,
Carl Homan
5219 Marlowe Street
Philadelphia, PA 19124-1329

1

Hoover, Anne
Page 1 of 1

PC_810

Levens, Matthew

From: Anne Hoover [ahoover2@verizon.net]
Sent: Thursday, March 27, 2008 2:36 PM
To: Complex2030
Subject: New nuclear weapons

Anne Hoover
12 Evergreen Lane
Middlebury, VT 05753-1547

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I have been opposed to aggressive use of nuclear weapons since August, 1945, when I was eighteen years old. They are inhuman and insane. Please do all you can to ban present & future uses. Thank you.

Sincerely,

Anne Hoover
802 388-2001

Hopping, Forrest
Page 1 of 1

PC_876

Levens, Matthew

From: Forrest Hopping [guajolotl@aol.com]
Sent: Thursday, March 27, 2008 12:11PM
To: ComplexZ030
Subject: NO NUKES

Forrest Hopping
2901 Covina St
Los Angeles,, CA 90032-3103

March 27, 2008

Complex Transformation Department of Energy

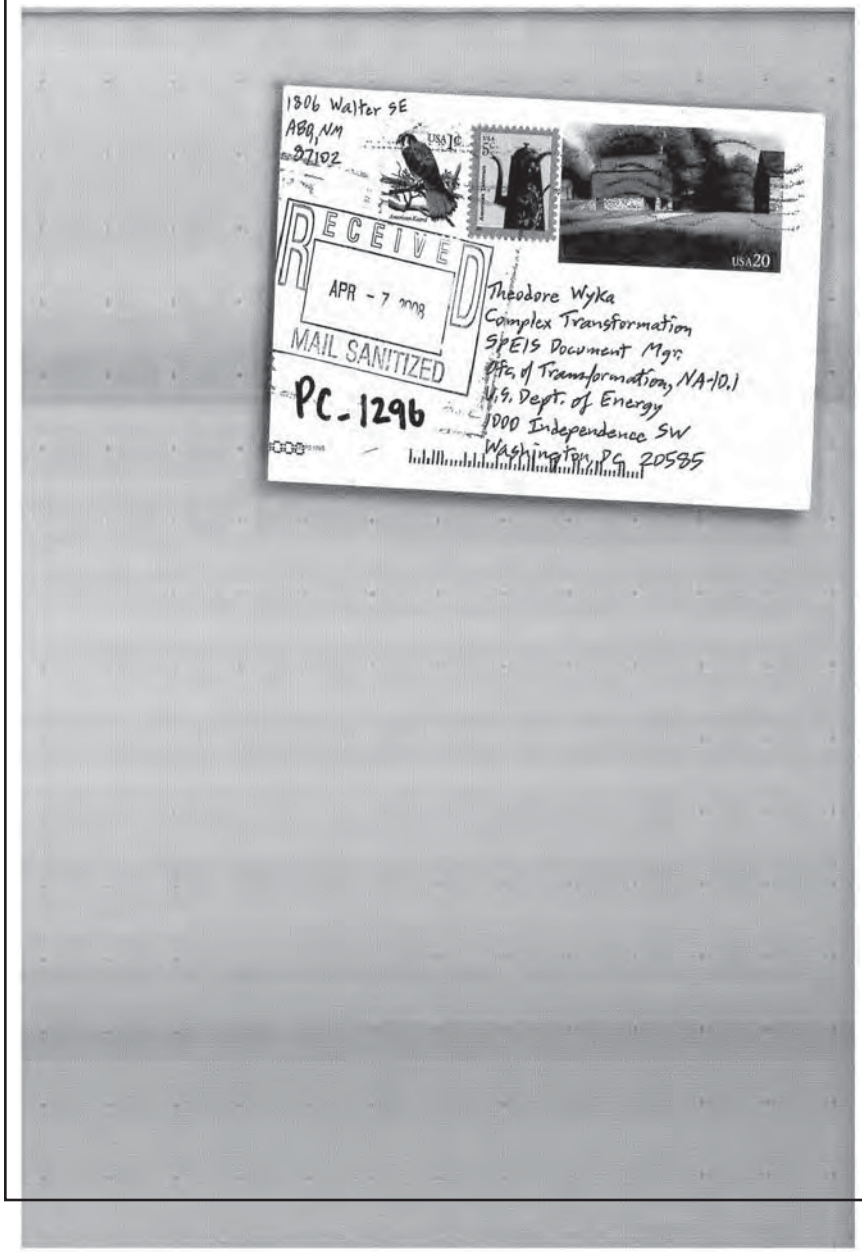
Complex Transformation Department of Energy:

1|16A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons. People who are mad for profit don't care about how they ruin the lives of others and how they contaminate the planet. They wind up fouling their own nest. Nuclear weapons are murder, and they are alsc suicide. I will not vote for any politician who allows for the proliferation of nuclear weapons. You can be sure they have taken bribes, and those are not the people I want in my government.

Sincerely,

Forrest Hopping

Hosking, Chuck
Page 1 of 2



Hosking, Chuck
Page 2 of 2

1|5I

2|1C

3|9H

PC 1298 3-30-08

Dear Mr. Wyka,

We do not need any more plutonium pits. The ones we have last a century. The current PEIS is based on a seven-year-old nuclear posture review which will likely be revised by whomever is elected president in seven months. It would be a colossal waste of taxpayer dollars to begin a transformation process now only to have to revise it or scrap it altogether based on an incoming administration's foreign policy posture. Since none of us can second-guess the future, it would be arrogant for DOE to hobble a new president with an outdated + possibly counterproductive plan. Please wait to see what the next administration has planned before making changes that could undercut the new president's policies.

Thank you for being reasonable,

—Chuck Hosking

1806 Walter SE Albuquerque, NM 87102

Houston, Guy
Page 1 of 1

PC_269

STATE CAPITOL
P.O. BOX 942849
SACRAMENTO, CA 94249-0015
(916) 319-2015
FAX (916) 319-2115

COMMITTEES
VICE CHAIR: JOBS, ECONOMIC DEVELOPMENT, AND THE ECONOMY
LABOR AND EMPLOYMENT
LOCAL GOVERNMENT

Assembly
California Legislature

GUY S. HOUSTON
ASSEMBLYMAN, FIFTEENTH DISTRICT

DISTRICT OFFICE
1630 CHESTNUT STREET, SUITE A-1
LIVERMORE, CA 94551
(925) 606-4990
FAX (925) 606-4488

SATELLITE DISTRICT OFFICE
740 THIRD STREET
BRENTWOOD, CA 94513
(925) 513-6558

SATELLITE DISTRICT OFFICE
1666 N. MAIN ST., 3rd FLOOR
WALNUT CREEK, CA 94596
(925) 988-6915
FAX (925) 988-6918

March 26, 2008

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1 U.S. Department of Energy
NNSA 1000 Independence Avenue, SW
Washington, D.C. 20585

Dear Mr. Wyka,

As the California state representative for Assembly District 15, which includes the City of Livermore and adjacent communities, I am writing to express my support for the National Nuclear Security Administration's Complex Transformation Supplemental Programmatic Environmental Impact Statement (EIS) proposal and, specifically, the Preferred Alternative as outlined in the EIS.

1|7N The restructuring and consolidation of the nation's nuclear weapons complex that will occur with the implementation of Complex Transformation is a good and necessary step forward toward a safer, more secure and cost effective nuclear weapons complex. I applaud you for this effort. I also compliment you on the tremendous value you have placed in the breadth of knowledge and expertise that exists at both Lawrence Livermore National Laboratory and Sandia National Laboratories, as reflected in the responsibilities they will hold with the Preferred Alternative.

Your continued care for the safety and economics of Livermore Valley citizens is essential. The Preferred Alternative, while having a vision for a smaller, more efficient operation through consolidation should monitor the employment and infrastructure needs of the community. The education and outreach capabilities of LLNL and Sandia have been generous, but will be even more important in the future.

2|15A Our national laboratories have served our nation well for more than 60 years. We appreciate them for the protections they have provided our nation and the world, as well as for the many benefits and opportunities they have granted to surrounding communities like ours here in California. We look forward to a continuing positive relationship with the community, particularly the City of Livermore, as the Complex Transformation proposal unfolds in coming years.

Sincerely,

Guy Houston
Assemblyman, 15th District

E-MAIL: Assemblymember.Houston@assembly.ca.gov
WEB: http://www.assembly.ca.gov/houston

Printed on Recycled Paper

Hovekamp, Larry
Page 1 of 1

PC_1134

Levens, Matthew

From: Larry Hovekamp [ellisplatt@hotmail.com]
Sent: Thursday, March 27, 2008 6:04 PM
To: Complex2030
Subject: Using our heads, not warheads!!!

Larry Hovekamp
3433 Newburg Rd. #5
Louisville, KY 40218-2436

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I am opposed to admininistration plans to construct a new plant to construct pits for nuclear weapon-grade plutonium and to modify nuclear facilities to rebuild the US nuclear
2|10C arsenal, especially triggers for nuclear warheads. I am referring particularly to the proposed and mislabeled Chemistry and Metallurgy Research Replacement (CMRR) project.

3|14K Plutonium is the planet's most toxic and hazardous substance, bar none!
4|1J Why are we joining nations such as Iran and North Korea in being stupid with such a
1|16A dangerous, yet scientifically demanding practice? Why are we competing to be ignorant with
(cont) a "smart" technology?

4|1J Competing with the atomic bully-want-to-bes in the world nuclear playground is not the way
(cont) to achieve peace. Nations such as Iran and North Korea will never back down if we counter-threaten them with more of the same bombs and its technology. Over fifty years of nuclear arms race never stopped the Soviet Union.

5|20 Even former Secretaries of State Henry Kissinger and George Schultz as well as French President Sarkozy advocate a start to reduce, then end, nuclear warfare. As the most eminent nuclear scientist of all time, Albert Einstein, once said "one cannot prepare for war and support peace at the same time."

6|8A Join other members of Congress by rejecting any Energy Department attempts to upgrade the arsenal and continue to defund the Reliable Replacement Warhead and last year's proposed mega-scale bomb plant.

1|16A We tried nukes and wasted funds, resources, and almost wasted lives and the World. Give
(cont) peace a chance.

Sincerely,

Larry Hovekamp
502-594-1451

1

Howard, Todd
Page 1 of 1

PC_1686

Levens, Matthew

From: toddlerh@pacbell.net
Sent: Saturday, April 05, 2008 3:49 PM
To: Complex2030
Subject: Complex Transformation SPEISComments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|16A Consider giving our children a planet in which this horror doesn't exist.

Sincerely,
Todd Howard
387 Miramar Ave.
Long Beach, CA 90814

cc:
Senator Dianne Feinstein
Senator Barbara Boxer
Representative Laura Richardson

Howe, Daniel
Page 1 of 2

PC_1617

Levens, Matthew

From: howedee@juno.com
Sent: Saturday, April 05, 2008 8:30 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|5D I applaud the Department of Energy for moving forward with plans to consolidate and reduce the facilities, workforce, and redundant capabilities within the nation's sprawling nuclear weapons complex.

However, Complex Transformation puts far too much emphasis on re-creating the unnecessary capability to research, develop, and manufacture new types of nuclear weapons. The United States should ask itself and every world leader a crucial question.

The question: Is killing massive numbers of innocent people EVER justified?

2|1J From our own national perspective, I would think the answer is NO! Yet, in our not so distant past, we as a nation have done so in an unprecedented fashion on a population of innocent men, women and children. The point here is not to hate ourselves or anyone else, but to examine ourselves and answer the question truthfully. Some will answer yes, but before you do so, think about it. How is it justified? If you really believe that it can be, then it opens the way for others to call theirs just.
Wouldn't the moral high ground be a no answer?

The key here is agreement. If all the countries on earth were asked this question following 911, the consensus would probably be that mass killings of innocents is never justified.
Regardless of whether you think the use of atomic bombs in WWII were justified or not,
3|16A would you agree that it is an awful thing to contemplate or do, and it should never, ever happen again?
This exercise opens the door to a universal acceptance that nuclear weapons be eliminated, forever.

An important step is reconciliation. This is a big deal for a real leader. It says to others, it's wrong to kill innocents.
What's past is past, but we don't want it to happen again and the only way to prevent it is to be proactive, join together in what's best for the world, and adopt a system to dismantle every nuke on the planet, and to collectively make sure no new ones are made.

Sounds outrageously optimistic right? It can't happen without first asking the all important question, finding agreement, forming a plan, and then following through.

That is our retributive role for having used weapons of mass destruction on innocents, justified or not, and it re-establishes our place as a truly great nation and promoter of peace.

4|1F Complex Transformation undermines U.S. efforts to stop the spread of nuclear weapons around the world. It violates the spirit and letter of the Comprehensive Test Ban Treaty and sends the wrong message to the world --that obtaining nuclear weapons will increase security.

I ask that you include my comment as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project.

1

Howe, Daniel
Page 2 of 2

Thank you.

PC_1617

Sincerely, Daniel N. Howe 7524 NE Stanton Portland, OR 97213

Sincerely,
Daniel Howe
7524 NE Stanton St.
Portland, OR 97213

cc:
Senator Ron Wyden
Senator Gordon Smith
Representative Earl Blumenauer

2

Hsieh, Ke
Page 1 of 1

PC_1420

Levens, Matthew

From: Ke Chiang Hsieh [hsieh@dakotacom.net]
Sent: Tuesday, April 29, 2008 11:46 AM
To: Complex2030
Subject: I Oppose the Production of New Plutonium Pits

Dear Mr. Wyka,

1|16A As a physicist, a student of the late Prof. John A. Simpson, who was the youngest physicist working on the Manhattan Project and co-founder of the Bulletin of Atomic Scientists, I am fully aware of the massive and lasting destructive power of nuclear weapons. For a evermore mutually interdependent world, we need to change course and pursue disarmament, not build up our stockpiles as the ?Complex Transformation? is intended for.

While refusing to lead the world in safeguarding our planet from global climatic change, the "Complex Transformation" sets an example of promoting nuclear threat from the only nation that has ever used nuclear weapons of mass destruction.

2|1J What we do as a nation on the issue of the "Complex Transformation" will speak loudly to the world what kind of a people we are, and the rest of world will react to us as we would react to a similar nation.

I am also sending a copy of this letter to the members of my Congressional delegation.

Ke Chiang Hsieh
4443 E. Burns
Tucson, AZ 85711

1

Huey, Miranda
Page 1 of 1

PC_1477

Levens, Matthew

From: Miranda Huey [mirandahuey@calmail.berkeley.edu]
Sent: Sunday, April 13, 2008 7:36 PM
To: Complex2030
Subject: Reject "Complex Transformation" plan to build nuclear weapons

Miranda Huey
461 Chantecler Drive
Fremont, CA 94539-4922

April 13, 2008

Theodore A Wyka
Complex 2030 SEIS Document Manager
Office of Transformation, U.S. Department of Energy, NA–10.1 1000 Independence Avenue, SW.
Washington, DC 20585

Dear Theodore Wyka:

1|16A The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal.

2|1J By building up its nuclear arsenal right now, the US is essentially telling the world, "Do as I say, not as I do." Investing in a project of this magnitude implies that the US will be relying on nuclear weapons as an integral part of its security strategy for decades to come. I support a 90 day extension of the public comment period to give Americans time to weigh in on this dangerous proposal.

Sincerely,

Miranda Huey

1

Huffman, Vernon
Page 1 of 1

PC_1559

Levens, Matthew

From: Vernon Huffman [kashimbi@earthlink.net]
Sent: Thursday, April 17, 2008 10:04 AM
To: Complex2030
Subject: Environmental Review

1|2O The ecosphere is complex beyond our comprehension. Hell, we have difficulties predicting the weather, much less determining the interconnectivity of species we haven't even cataloged yet. But we know plutonium is deadly to every form of life we've ever tested it on. In fact, all radioactive material is mighty toxic. It only makes sense, for the survival of life on the planet to quit creating it and spreading it around.

2|1K The US government is not infallible. We may have already set the course for human extinction. Just because you read this, we can't expect you to set things right. But we can beg you not to do any more wrong. Please quit participating in the construction of nuclear weapons, because you love children.

Vernon Huffman
http://vernonhuffman.blogspot.com/
1-541-757-4981

1

Hufker, Barry
Page 1 of 1

PC_379

Levens, Matthew

From: Barry Hufker [barryhufker@yahoo.com]
Sent: Friday, January 18, 2008 9:58 AM
To: Complex2030
Subject: SPEIS, Complex Transformation

Mr. Wyka:

1|3A 2|1C 3|14M3 4|9H There is no reason to rush into a costly new program to build unnecessary and unwanted nuclear weapons ? especially before congressional and administration mandated nuclear policy reviews are completed. With so many unresolved issues around nuclear waste, storage, employee safety and compensation and popular will for reducing nuclear weapons it doesn't make sense for U.S. taxpayers to invest in a new generation of nuclear weapons facilities.

Barry Hufker
[redacted]lace
[redacted], MO 63117

1

Hughes, Pegatha
Page 1 of 1

PC_687

Levens, Matthew

From: Pegatha Hughes [hpegatha@earthlink.net]
Sent: Wednesday, March 12, 2008 10:32 AM
To: Complex2030
Subject: Comment on nuclear weapons program

Pegatha Hughes
707 Pelton Ave
Santa Cruz, CA 95060-6546

March 12, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

Dear Representative and Senator,

1|16A I urge you not to support the latest Bush administration's move to build a plant to produce plutonium pits for nuclear weapons. We all know it is unthinkable that these weapons should be used and that any move on our part only strengthens that approach in other countries.

Please be part of the effort for peace. For all our sakes - for my grandchildren's and children everywhere.

Sincerely,

Pegatha Hughes

1

Hughes, Jr., Charles
Page 1 of 1

PC 230

Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

Written Comment Form

Must be received on or before April 10, 2008.

1|13A.1 Nuclear Weapons are obsolete in today's world. Instead of making us more secure, they serve to make other nations fearful of us, so they want to get nuclear weapons of their own. We cannot continue to insist on a few countries (the US and our "friends") having nuclear arms and begging the rest of the world from acquiring them also. We need to implement a new policy of abolishing all nuclear weapons, in every country including our own, worldwide.

2|1J Therefore, it is the greatest folly to think of creating new and more precise nuclear weapons. Instead of building new facilities for nuclear weapons, we need to get rid of the ones we have. Instead of creating new nuclear waste, we need to develop a plan to contain securely all that we have now.

3|7J Instead of spending more money on nuclear weapons development and production, we need to use our resources for construction projects at home and abroad.

4|9B Only then can we restore confidence in the world community and truly work for peace, justice, and security.

Charles R. Hughes, Jr.
1118 N. Carter Rd.
Decatur, GA 30030

Please use other side if more space is needed.

Comment forms may be mailed to:
Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Comment forms may be faxed to:
(703) 931-9222
or sent by electronic mail to:
complextransformation@nnsa.doe.gov

You may also submit comments through the project website which can be found at:
http://www.complextransformationspeis.com

Humes, Fred
Page 1 of 2

ECONOMIC DEVELOPMENT PARTNERSHIP
Serving Aiken & Edgefield Counties

PC_121

Fred E. Humes
Director

Statement for the Record
Draft
Complex Transformation
Supplemental Programmatic Environmental Impact Statement

My name is Fred Humes and I am the Director of the Economic Development Partnership, Aiken, South Carolina. I thank the Department of Energy for the opportunity to provide comment on the very important matters contained in the draft Supplemental Programmatic Environmental Impact Statement: matters which will determine the well-being of our nation's nuclear defense shield through the rest of this century. I am here today to offer three comments on the draft SPEIS

1|15A; 2|9B

1. We strongly support the DOE objective of transition to a smaller, more efficient, more secure and more responsive nuclear weapons complex. Many facilities in today's complex were established to support a national nuclear stockpile containing several tens of thousands of weapons, and with new designs entering production each year. The future stockpile will be much smaller with fewer numbers of weapons types being produced and supported. There are many budget and operational efficiencies which can be achieved by modernizing and sizing the future weapons complex to more closely meet the expected needs. In preparing to meet the future need we recommend that DOE take a long-term planning approach and provide facilities and other capabilities which will be adequate to meet a range of defense needs for at least the next 50 to 60 years.

2. We are very pleased that one of DOE's preferred alternatives is to consolidate Tritium R&D at the Savannah River Site. Tritium has been a hallmark of the Savannah River Site since the 1950s. We, in the community, join our SRS neighbors in taking pride in the site's enviable production record while maintaining excellence in public safety, environmental protection and worker safety. The community stands ready to assist DOE in achieving an efficient and seamless transition of R&D activities

3. We continue to be concerned about the Department's lack of commitment to providing an adequate capability to meet the long-term needs for manufacture of plutonium pits. The draft SPEIS includes positive statements that a need exists to manufacture 125 pits per year (single shift) implying that a new Consolidated Plutonium Center is required, yet the preferred alternative supports only 50 pits per year (single shift) in the old and heavily modified TA-55 facilities. Rather than spending large sums of scarce financial resources in the ill-suited TA-55 facilities, these funds should be invested in a modern manufacturing facility of adequate size and capabilities to meet the nation's needs for many decades. Fiscal

Post Office Box 1708 Aiken, SC 29802 471 University Parkway
(803) 641-3300 Fax (803) 641-3369 edpsc@aol.com www.edpsc.org

Humes, Fred
Page 2 of 2

responsibility and national security will be better served by taking the long-range view.

1|15A (cont.)

EDP is proud of the vibrant and extensive nuclear infrastructure which exists in our region. This capability includes the nation's only production-scale plutonium infrastructure at SRS. These physical and intellectual assets, combined with the supportive working relationship between DOE and our community will serve DOE and NNSA well for many years to come.

Again, thank you for the opportunity to provide input to this very important decision.

Hungerman, Marie
Page 1 of 1

PC_1802

Levens, Matthew

From: Marie Hungerman [mghungerman@ihmsisters.org]
Sent: Friday, April 04, 2008 9:03 AM
To: ComplexZ030
Subject: opposition to more nuclear plant

Marie Hungerman
610 W. Elm Ave.
Monroe, MI 48162-7909

April 4, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons. Please, no more destruction of people and lands !

Sincerely,

Marie L. Hungerman
734-240-8195

Hutchinson, Betty
Page 1 of 1

PC_25

January 28, 2008

Director, Department of Energy
Public Comments
1000 Independence Ave. SW
20585

Dear Sir:

1|16A
2|3A
3|1J This is a comment in relation to the development of new nuclear weapons. Please stop Complex Transportation and New Nuclear Weapons development. We already have 10,000 nuclear weapons. Any further development violates the Non Proliferation Treaty and counteracts our Nation's policy of discouraging other countries from developing nuclear weapons.

4|9B The $150 billion to build a facility to develop 125 new cores a year for the next 25 years is destructive of our Nation. In view of our impossible national debt and to slow the militarization of our country, I feel we must stop this project and dedicate the $150 billion to developing and increasing new alternative energy resources.

Sincerely,

Betty Hutchinson

Betty Hutchinson
17310 Quaker Lane, C19
Sandy Spring, MD 20860

Hutchison, Kay
Page 1 of 1

KAY BAILEY HUTCHISON
TEXAS

PC_240

COMMITTEES:
APPROPRIATIONS
COMMERCE, SCIENCE, AND TRANSPORTATION
RULES AND ADMINISTRATION
VETERANS' AFFAIRS

United States Senate

WASHINGTON, DC 20510-4304

March 12, 2008

Mr. Theodore Wyka
Complex Transformation
SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/N.N.S.A.
1000 Independence Avenue, S.W.
Washington, D.C. 20585

Dear Mr. Wyka:

I write today regarding the U.S. Department of Energy's Nuclear Weapons Complex Transformation and its affect on the Pantex Plant in Amarillo, Texas.

1|15A As you are aware, the Complex Transformation is a Department of Energy initiative designed to make our domestic nuclear weapons complexes smaller, safer, and more secure. I support this initiative and its relationship to the President's goal to significantly reduce our nuclear weapons stockpile by 2012. However, inherent in any effort to consolidate an industry is a corresponding decrease in necessary workforce. I respectfully ask that, when determining staff reductions during completion of the Supplemental Programmatic Environmental Impact Statement, you take into consideration the large presence that the Pantex Plant has in Amarillo.
2|18A A significant staff reduction at the Pantex Plant would result in an adverse impact to this
3|18C important community in the Texas Panhandle. The Pantex Plant has served as the nation's preeminent nuclear weapons assembly and disassembly facility since 1951, and I look forward to it remaining in this role for many years to come.

I appreciate your attention to this matter. If you require any further information or assistance, please do not hesitate to contact me.

Sincerely,

Kay Bailey Hutchison

Kay Bailey Hutchison

Web=http://hutchison.senate.gov

Hutchison, Ralph
Page 1 of 31

PC_1911

Levens, Matthew

From: Ralph Hutchison [orep@earthlink.net]
Sent: Wednesday, April 09, 2008 12:34 PM
To: Complex2030
Cc: Complex2030
Subject: Comments on Draft S-PEIS

Attachments: Detailed talking points.doc

Detailed
ıg points.doc

Below and attached as a Word file are the comments of the Oak Ridge Environmental Peace Alliance.

Comments of the Oak Ridge Environmental Peace Alliance

on the National Nuclear Security Administration's

Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement

(DOE/EIS 00236-S4)

April 2008

Request for Extension of Comment Period

Prior to the release of the Draft SPEIS, the Oak Ridge Environmental Peace Alliance joined with other members of the Alliance for Nuclear Accountability in November, 2007, to request an extended comment period of 120 days—our request was predicated on an expectation that the Draft SPEIS would be something less than a quick read. DOE instead established a comment period of 90 days; since that time, we
1|2E have received the Draft SPEIS which is massive and contains a wide variety of technically demanding information.

Recently, the NNSA received additional requests for an extension of the comment period from members of Congress and the public but declined to extend the comment period.

The Oak Ridge Environmental Peace Alliance believes a comment period of 90 days is inadequate for members of the public (whose lives are not put on hold while they respond to the Draft SPEIS) to adequately analyze and respond to a document this voluminous, detailed and challenging.

We are asking DOE/NNSA to reconsider its decision not to extend the comment period and to announce an additional 60 day comment period to permit further public comment.

The Fundamental Question

An Environmental Impact Statement starts with a statement of the purpose and need for the proposed action. Absent a persuasive case

1

Hutchison, Ralph
Page 2 of 31

PC_1911

that the action under consideration is truly needed to achieve a legitimate and legal purpose, any EIS would be rendered moot and should be discontinued. 2|3A

Given that the primary justification for the "transformation" of the nuclear weapons complex has been called into question by Congress, it is worth examining carefully the arguments put forward in the document to justify a new nuclear weapons complex.

Remarkably, the justifications are predicated not principally but only on the requirement of the President's Nuclear Posture Review of 2001—six years ago. The Nuclear Posture Review is the document that consolidates the advice and wisdom of a variety of experts—military, arms control, diplomatic, technical—and articulates in detail the nuclear weapons strategy, force structure and policy of the United States. In response to the NPR of 2001, the National Nuclear Security Administration has determined, six years later, that a new nuclear weapons complex is necessary to achieve "a credible nuclear deterrent with the lowest-possible number of nuclear warheads consistent with our national security needs." (Draft SPEIS, S-9) 3|1C

Last year the National Nuclear Security Administration presented in broad strokes its outline for the transformation of the nuclear weapons complex and production of the Reliable Replacement Warheads to Congress in making its annual budget request. In response, Congress said it is time to update the Nuclear Posture Review in order to determine what kind of infrastructure is, in fact, necessary to guarantee our national security. 4|8A

Absent that re-examination, it is reasonable to argue that the current process is premature and should be put on hold pending the completion of a new Nuclear Posture Review. That seems unlikely; those who want this project to go forward feel compelled to push to bring it to a conclusion under the current Administration, NNSA Director Thomas D'Agostino recently noting he felt "a sense of urgency" to push Complex Transformation through.

We are not, however, unable to undertake any analysis of the purpose and need in the absence of a new Nuclear Posture Review. We can imagine a review of US policy and strategy prepared by a commission that would include leading experts in the field of arms control, national security, defense and diplomacy. We can imagine their analysis and views were met with widespread concurrence by others experienced in policy and strategy throughout our government and around the world. The report of such a commission would undoubtedly take center stage in the discussion phase of the next Nuclear Posture Review. There is nothing controversial about our fantasy.

From the findings of this commission, we could reasonably speculate about what kind of nuclear weapons complex would be required to achieve security for our nation, and from there, we could reasonably address the core motivation of the NNSA as it prepares a document outlining possible alternative future weapons complex configurations that meet the president's goal of "the lowest-possible number of nuclear warheads" required to guarantee the security of the United States.

Imagine these wise men and women publishing their words not in a super-secret classified Nuclear Posture Review, but in the pages of the Wall Street Journal.

Now, we can stop imagining. It has happened. In January 2008, former Secretary of State and National Security Adviser Henry Kissinger,

Hutchison, Ralph
Page 3 of 31

PC_1911

former Secretary of State and Bechtel corporate officer George Shultz, former Secretary of Defense and Admiral William Perry, and former chair of the Senate Arms Services Committee Sam Nunn wrote their second op-ed piece in the Journal outlining their views on future nuclear policy and strategy. Among those who support their views are Madeleine Albright, Richard V. Allen, James A. Baker III, Samuel R. Berger, Zbigniew Brzezinski, Frank Carlucci, Warren Christopher, William Cohen, Lawrence Eagleburger, Melvin Laird, Anthony Lake, Robert McFarlane, Robert McNamara and Colin Powell.

This list includes no one particularly distinguished by liberal or pacifist views; it represents the defense and national security apparatus that has shaped and carried out US security policy over the last forty years. It is solidly bi-partisan and completely establishment.

These leaders, whose words will, in fact, be instrumental in formulating US policy, strategy, force structure and infrastructure requirements in the next Nuclear Posture Review, have embraced a vision of a world free of reliance on nuclear weapons for security. They quote Mikhail Gorbachev: "It is becoming clearer that nuclear weapons are no longer a means of achieving security; in fact, with every passing year they make our security more precarious."

They quote the United Kingdom's foreign secretary, Margaret Beckett: "What we need is both a vision—a scenario for a world free of nuclear weapons—and action—progressive steps to reduce warhead numbers and to limit the role of nuclear weapons in security policy. These two strands are separate but they are mutually reinforcing. Both are necessary, but at the moment too weak." 4|1C (cont)

5|1J

This is the world we live in, at least most of us. The peace movement has been on the leading edge of this realization; it appears that the political leaders are catching up; we hope it is not too late.

Here is what Kissinger, Shultz and company say in their own words: "With nuclear weapons more widely available, deterrence is decreasingly effective and increasingly hazardous."

This, obviously, calls into question the fundamental premise of the 2001 Nuclear Posture Review which motivates this document and reveals that the Complex Transformation Draft SPEIS and the alternatives it considers are anchored in a past which is "no longer operable."

These new and unexpected abolitionists convened a conference in October 2007 at the Hoover Institute, a right-wing think tank, which they describe as having general agreement about the importance of the "vision of a world free of nuclear weapons as a guide to our thinking

about nuclear policies, and about the importance of a series of steps

Hutchison, Ralph
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that will pull us back from the nuclear precipice."

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This is important. In January 2007 these authors published their views for the first time. In the intervening twelve months, they saw their vision gather support around the world, not because their rhetoric was irresistible, but because the wisdom behind their words is compelling. In January 2008, they put flesh on their vision, proposing those practical steps that will lead the world, in their words, back from the nuclear precipice.

The US and Russia, they say, possessing almost 95% of the world's nuclear warheads, have "a special responsibility, obligation, and experience to demonstrate leadership."

6|1F Among the steps they call for are the universal application of monitoring compliance with the Nuclear Nonproliferation Treaty and the consolidation of weapons designed for forward deployment "as a first step toward careful accounting for them and their eventual elimination."

They call for an international dialogue, including nuclear and non-nuclear weapons states, to address "turning the goal of a world without nuclear weapons into a practical enterprise among nations, by applying the necessary political will to build an international consensus on

priorities."

7|7O This brings us to a fifth alternative which must be considered in detail in the Environmental Impact Statement before it can be considered complete, an alternative that thousands of people advocated in the scoping process, yet the NNSA did not see fit to present it in the Draft SPEIS. The Draft SPEIS on Complex Transformation must consider a nuclear weapons complex that produces no nuclear weapons. (See No Production Alternative, below)

6|1F (cont) No refurbishing of aging weapons, no design or production of new weapons, no stockpile life extension program. None. This is the only legitimate path to disarmament; it is the only conceivable alternative that supports the stated nonproliferation goals of the United States; it is the only alternative that has any chance of being recognized by the international community as being consistent with our obligations under the nuclear Nonproliferation Treaty.

The obvious truth at this moment is that Congress is right—the 2001 Nuclear Posture Review is history. The SPEIS on Complex Transformation, contemplating a future predicated on the vision of a world still threatened by the policy of deterrence, is either a complete waste of time or the most perilous course imaginable.

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5|1J (cont) That's why tens of thousands wrote and spoke during the scoping process and why tens of thousands more will comment during this process. We dare not take the chance that these terribly dangerous plans will die of their own weight. We advocate creating a future in step with the momentum of the world; we recognize that being guided by a vision that is no longer in step with the world will doom us to future that depends on an economic machine that is rotting from within.

For years people arriving in Oak Ridge were met at the city's boundary with a sign that said "The Vision Lives On." I never quite knew what it meant—if the sign referred to a vision of progress through scientific discovery, I think it may still be a good theme for the community to rally around. But if the sign meant "national security through nuclear weapons," then it's time to take the sign down. That vision does not live on.

Programmatic means the whole program

8|12A The Draft SPEIS does not consider the potential impact of decisions stemming from the SPEIS on operations at DOE's Kansas City Plant. Currently DOE is pushing to complete an Environmental Assessment and issue a Finding of No Significant Impact on the relocation of the Kansas City Plant.

The Complex Transformation ROD may significantly affect the requirements of any operations at the Kansas City Plant—DOE's rationale that the KCP is non-nuclear and therefore not impacted by decisions in the C-Trans SPEIS fails to consider a No Production Alternative (see below) which would have a dramatic impact on the Kansas City Plant and completely eliminate the need for an expensive relocation of the facilities there.

Similarly, decisions about relocating or co-locating other pieces of the nuclear weapons complex could impact the size and extent of operations at the Kansas City Plant in ways that would significantly alter considerations currently included in the EA being prepared. The range of production capacities in the current Draft SPEIS seem to be 50-200, and the "Complex of the Future" may or may not have the capacity to produce new design nuclear warheads. Clearly, decisions which impose limits on the number or type of warheads will affect the capacity requirements for the Kansas City Plant.

Technical justification

There is no technical driver for Complex Transformation, and the truth of this has been demonstrated by the constant shifting of the statements of "justification" provided by the NNSA.

9|5C.1 First, the NNSA declared we needed the new weapons complex to design and build new bombs, and we needed to do this to maintain a reliable arsenal. Our current—old—arsenal relied on plutonium pits that would degrade over time, so we need a new, more reliable design.

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This was the argument put forward by the scientists from the lab and the administrators who direct the labs. They carried the message to Washington and lined up politicians—we have to have Reliable Replacement Warheads.

9|5C.1 (cont)

They held fast to this justification, really, right up until the JASON report that found, after careful examination, that there was no aging issue with plutonium pits. In response to the JASON report in November 2006, the NNSA announced plutonium pits could be considered reliable for 85-100 years, nearly doubling previous estimates.

What are we to make of this? Are the JASON folks just smarter than the lab folks, the Administrators and Pete Domenici? Did they have access to some even more secret information than the weapons designers themselves?

No, of course not.

So why were the weapons labs questioning the reliability of the current arsenal, saying national security would be compromised without this new RRW?

The only answers available are not nice ones:

A. They didn't do their homework, at least not as well as the JASON folks.

B. They were putting considerable spin on the "facts" in order to make a case for more money to keep the labs going.

C. They sincerely, incompetently and wrongly believed plutonium pits had aging issues that compromised the reliability of the stockpile.

D. They were lying to get money for their latest tech toy and were willing to undermine US nonproliferation efforts at place the planet at increased risk for the money.

E. They just like to build bombs. It's what they know how to do.

In one sense, it doesn't matter now what their reasons for making the argument were. That argument evaporated in the face of the JASON report.

In another sense, though, it might matter a lot. Because now we have to hear all the arguments about the need for new warheads, the need for new bomb plants, the need for…anything, really, with considerable skepticism in light of what we know about their commitment to the truth as balanced against their commitment to pork, to the money.

That said, it is still important that the record is clear: to date, no legitimate technical justification for this program has been established.

Economic impacts

Consideration of economic impacts must address questions which are not simple.

10|9E

First, what is the economic impact of the alternatives on the communities most directly involved? The Alternatives in the Draft

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SPEIS present a variety of scenarios to communities like Oak Ridge. Under one alternative, your community will see a huge influx of construction dollars; under another, not so much. And some are in-betweeners.

10|9E (cont)

Consideration must be given, too, though, to the unseen economic impacts. Does it affect the local economy to have a facility which produced weapons of mass destruction as a significant piece of its economic base? How do we account for the reputation of a community plagued with legacy contamination when it comes time to recruit other businesses?

Since the earliest days of the Manhattan Project, production schedules and the money that followed them have driven the agenda at Y12 and other bomb plants. In the competition for federal dollars, cleanup dollars have always competed with production dollars—for that matter, according to Oak Ridge officials, even within Defense Programs money for dismantlement and disposition competes with production for funding.

So we have to ask: how would each of the proposed alternatives affect our community—would they assist us in diversifying our economic base? Would they encourage a greater and more reliable commitment to environmental restoration? Would they enhance the image of Tennessee's resource valley as a progressive, healthy place to locate one's business and raise one's children.

Each of the alternatives in this SPEIS present a mixed economic forecast. We can guess about how many tax dollars each of them might bring to Oak Ridge, but we can not as easily assess the cost to our community, except to say there is one, and it is not insignificant.

A fifth alternative—a nuclear weapons plant that produced no nuclear weapons—might present a more attractive economic outlook to the community. A nuclear weapons plant that produces no nuclear weapons still has a mission, one which is critical for US and global security. The No Production Y12 would be responsible for safely dismantling and disposing of nuclear weapons components as they are returned from the retiring stockpile. As a DOE official once said, "We need the same trained workforce to take them apart as to put them together. It takes the same wrench, we just turn it the other way."

7|7O (cont)

So, imagining a twenty-five to thirty year workload of weapons dismantlement and disposition work, we can forecast a possible "no job loss" future for the No Production Y12. Of course, this places a burden on our political leaders—they have to make the compelling case in Washington, DC, with our support—that this work is critically important. But it seems conceivable, with the support of people like Henry Kissinger and George Shultz and Sam Nunn, that the case could be convincingly made. And they have to make the case that Oak Ridge is the place to continue to do it—this seems an even easier case to make.

Now the other parts of the economic picture can fall in to place. The No Production Y12 Alternative includes aggressive cleanup of legacy contamination—some still at large in the environment, like mercury, and some in "storage," like the Walk-in pits. If Y12 is to be a state-of-the-art facility, conducting weapons dismantlement and disarmament in a fully safeguarded, verifiably transparent manner, it should insist on a full commitment to safeguard employees at work and at home nearby from threats from legacy contamination. In other words, clean the place up.

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10|9E (cont) When you go to the tire store to buy tires or get your oil changed, they put an "environmental fee" on your bill, to pay for the cost of disposing of the waste. It's not a scam—it's an effort to factor in the full cost of doing business. Same for nuclear weapons.

11|9F Economic analyses must include cost/benefit calculations that itemize not only the assets provided (or withheld) from any community considered as a possible host to any site in the Alternatives, the calculations must also at least summarize the debits—the economic downside that adheres to a generally unattractive industrial operation which presents a clear target for hostile attack, the potential for catastrophic environmental releases or accidents, and the stigma attaching to the production of weapons of mass destruction.

Finally, there is the potential economic benefit to be realized from marketing a new kind of bomb plant, one which is engaged not in a vain effort to procure security for the US, but one which is truly doing the swords-to-plowshares work that would be internationally recognized as beneficial to all the world. Rather than hide our work in secrecy, we could proclaim it proudly. Imagine recruiting the best and brightest to our community to join in this work, to be in the vanguard of those working to remove the nuclear threat and secure the globe from the threat of nuclear annihilation. It doesn't take much of a wordsmith to realize you could frame those recruiting pitches in pretty inspiring ways.

Secondly, what is the economic impact on communities not directly involved?

Over the past 65 years, communities that built the nation's atomic and nuclear weapons have received disproportionately large shares of federal funding—we get way more than we put in, in other words. Hence the Cadillac school system in a state that consistently ranks near the bottom of national charts in education. And the superpool and all the other amenities that distinguish Oak Ridge from other towns its size in Tennessee.

But the national budget—Iraq war aside—tends toward being a zero sum game. If we spend money in one place, we don't have it to spend in another.

So a comprehensive economic analysis in an environmental impact statement must look not only at the possible benefits to the local community, but must evaluate those benefits in light of their impact on other communities and the nation as a whole. This, of course, was raised in the scoping process, but, again, did not find its way into the Draft SPEIS.

What does it mean to the nation that the third Congressional District in Tennessee ranks in the top five districts in the United States in the number of federal dollars raked in since 1940? What does it mean to Tennessee—to our children over the last generations—that tens of billions of dollars have been devoted to building nuclear weapons which we put in the ground or on subs and never use rather than to building schools? More specifically, why do communities in East Knoxville compete for half a million dollars in Empowerment Zone funding when, just twenty-five miles west, the federal government is pouring a billion dollars a year into bomb building—more under some of the proposals in the Draft SPEIS?

Do we think this just doesn't matter? Or that the money is just our share? Does the economic analysis in the Draft SPEIS tell us where

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11|9F (cont) the money really goes? If Oak Ridge has received billions of dollars in the last ten years, where is it? In the collapsed shopping mall? In the un-staffed crosswalks at our public schools? In gleaming new buildings at Y12? The people of this community deserve to know exactly where all this money is going, and any salient economic analysis would tell them.

The Final SPEIS, in considering a No Production alternative, must present a full economic analysis which includes benefits as well as costs to the local community in the context of a larger economic analysis that looks at the needs of our state and nation.

Environmental impacts

Since the decision being analyzed in this Draft SPEIS is programmatic, any assessment of the impacts on the natural environment must be equally broad in scope.

Environmental impacts have historically been assessed "from cradle to grave." In this case, the potential for environmental impacts must be assessed not only for the design/production/testing processes themselves, but also for the potentially devastating effects of a complete release of contaminants used in the design/production/testing processes from a variety of possible release events: a catastrophic accident, an accidental release, a natural disaster, a hostile attack, use of purloined contaminants in an attack by hostile forces (a dirty bomb which might spread uranium, beryllium, lithium deuteride…), theft and dispersal by a disgruntled employee, failure of support systems (the anhydrous hydrogen fluoride system at Y12, for instance).

Any of these events which dispersed contamination into the atmosphere would, in the case of any of the Alternatives under consideration by DOE, add to the burden already borne by the environment, workers and off-site public from previous releases.

The Y12 site in Oak Ridge, for instance, is a Superfund site; over the past sixty years it has been responsible for the largest release of mercury to the environment in human history. Groundwater to the west of the Y12 site has been contaminated by hazardous chemicals and radionuclides, and the aquifer below Y12 is contaminated with nitrates, solvents (tricholoroethene and others), radionuclides (uranium and technetium99) and heavy metals (uranium, cadmium, strontium). Wells to the east of Y-12 contain volatile organics like benzene and toluene and a murderer's row of metals: boron, beryllium, cobalt, copper, chromium, lead, lithium, mercury, manganese, nickel and uranium. [Y12 Site-Wide EIS]

12|10I

Here is just a partial list of the scope of contamination, with some reference to accidents and other events which contribute to the contamination problems. While no complete documentation of Y12 contaminant releases exists (at least in an unclassified form), and no comprehensive record of accidents and incidents exists, the following presents enough of a record to make the point—neither the processes nor the personnel at Y12 can be expected to be free from error, and in the case of nuclear weapons, errors can have dramatic consequences.

From a 1994 report by researchers from the Oak Ridge National Laboratory: "Airborne mercury in the Y-12 area results from several sources, including vaporization from contaminated soil, fugitive emissions, coal combustion at the Y-12 plant, and legacy mercury contamination."

From a news report in December, 2007: "The Department of Energy's Office of Inspector General states that Y-12 management had not 'consistently implemented' controls for beryllium contamination - especially when the contamination was found outside designated beryllium work areas."

From a news report in September 2007: August 14, 2007 and August 16,

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2007 radiation contamination events at Y12 resulting in worker exposures, apparently to uranium.

From a USGS study in 1989: "Contaminants were found in water samples from several of the wells in concentrations which equaled or exceeded drinking-water standards established by the US Environmental Protection Agency are antimony, chromium, lead, mercury, selenium, phenols, and strontium-90. Total and dissolved uranium concentrations exceeded the analytical detection limit in nearly 70% of the wells in the flood plain. The results of water quality determinations demonstrate that elevated concentrations of most trace metals (and possibly organic compounds and radionuclides) were caused by contaminated sediments in the samples."

A 2005 report from the Tennessee Department of Environment and Conservation: "A groundwater plume contaminated with nitrates, uranium-238, and other radionuclides and metals underlies the central complex area. This plume originates from the S-3 Ponds (on the divide with Bear Creek Valley Watershed) and from other sources within the complex.

12|10I (cont) It is certainly fair to draw some simple conclusions from this list: Contamination from historical operations is significant and uncontained, especially in the groundwater. Contaminants have moved off site and are no doubt continuing to move off site.

Any environmental evaluation of the Y12 site for a future role in the context of the "big picture" must assess the clear conflict between a dedicated effort to clean up historic contamination and the continued operation of a high-priority production facility. As noted in scoping comments, the presence of an operating weapons production facility and the levels of security necessary to operate such a facility at the very least inhibit current efforts to remediate contamination from the past.

While it may be impossible to predict the frequency, nature, or severity of releases from accidents or events on site, the following list should persuade any reasonable person that events and accidents will undoubtedly occur:

From Sept 22, 2006, a report of a uranium fire in a glovebox—the report was withheld from the public for several weeks. In January of 2008, the Defense Nuclear Facilities Safety Board criticized plant officials for their investigation and response to a fire in the 9212 complex.

From a 2007 report by Robert Alvarez on safety at Y12 documenting significant workplace incidents in just the last decade:

2 July 1997: waste drum explosion

30 July 1997: waste drum explosion

7 August 1997: explosion and fire in chemical reaction vessel

5 August 1998: brine pump explosion; one operator receives minor cuts on the face and chest from flying glass.

Late 1990s: four high-voltage cable explosions

31 March 1999: lithium explosion

8 December 1999: chemical explosion in a building housing depleted uranium. Eleven workers are injured and three hospitalised

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14 December 1999: lithium hydride fire

11 January 2000: laboratory explosion

19 October 2001: electrical explosion. A 2300-volt cable short-circuits, blowing out every window in building 9404-1

January 2002: waste drum explosion

October 2002: uranium fire. Powdered uranium ignites after being stored in a glovebox for 10 years

15 April 2003: glovebox explosion and fire in building 9202

Week of 22 August 2003: electrical fire in building 9202

13 November 2003: electrical fire

22 April 2004: fire in laboratory in building 9995. The Y-12 fire department is not notified until more than 1 hour after initial observation of the fire.

12|10I (Cont)

22 November 2005: fire in special materials processing building One worker requires medical attention.

16 March 2006: electric motor fire in special material processing building

22 September 2006: uranium container fire

From a December 2005 news report: "A process filter that went unchanged for nearly 20 years at the Y-12 nuclear weapons plant contained about 1,800 grams of U-235 -- more than 10 times as much as indicated by an in-place monitoring system. The surprising load of uranium prompted an internal investigation at Y-12 and questions from a federal safety board. An Aug. 19 memo by the Defense Nuclear Facilities Safety Board said the amount of U-235 -- the fissile isotope of uranium used in warheads -- exceeded the 'action level' for nuclear criticality safety."

Clearly the Y12 facility is not exempt from operational deficiencies, whether due to human error, equipment malfunction, or inadequate planning or implementation of operational procedures. The final EIS must do a careful and thorough analysis of the potential for significant environmental impacts on-site and off-site, from events, incidents and accidents.

Moral considerations

13|16A Any number of the concerns expressed in the comments above draw us inexorably toward the moral dimension of nuclear weapons production. The decision to divert resources from social programs to nuclear weapons programs has a moral dimension; the decision to tolerate a certain level of injury to the natural environment as a consequence of production activities has a moral dimension. Even the framing of a justification for the selection of alternatives, each of which proposes the US pursue a "do as we say, not as we do" nonproliferation agenda, has a moral dimension.

These factors impact the social and cultural health of the community which hosts a bomb plant—they are part of the "environment" which should be considered in an environmental impact statement, but which are absent from the Draft SPEIS.

To neglect them, though, is to carve out a piece

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of our living environment as though it does not come in to play or does not matter, neither of which are true.

And looming over all these questions, in any cradle to grave consideration of nuclear weapons production—the program which motivates the "programmatic" environmental impact statement, is the big one: should these bombs be used, what will it do to us as human beings? Some millions of us, of course, will be gone, vanished in an instant, turned to vapor and ash. With us will go our culture, our libraries, our pets, our marriages, our children, our homes, streets, bridges, plumbers, doctors, electricians, teachers, schools, banks, parks, trees, flowers, insects, hummingbirds, insurance companies, hospitals, churches, mosques, crucifixes, menorahs—everything that is the environment in which we live. 13|16A (cont)

Some of us may survive, entire cities perhaps. What will it do to them? What would it do to us, in Oak Ridge, if our bombs were used to annihilate one billion people in North Korea, or three billion people in China, or even a hundred million in Russia or twelve million people in Tehran? If we wiped nine hundred square miles of Afghanistan or Pakistan or Iran clean of all life, all people, all animals, all vegetation, rendered it uninhabitable for centuries? Who would look back at us from the mirror? How would our identities be changed, redefined, in that instant when we knew what we had done? When CNN showed us the missiles rising into the sky and our children turned to us asking us the meaning of it, how will we answer when we no longer know who we are?

This, of course, is the crux of the objection to nuclear weapons from a moral standpoint. An exchange of nuclear weapons will change the nature of humanity in a fundamental way; even ethics itself will be murdered.

In its wise decision in 1996, the International Court of Justice in the Hague (the World Court) drew together not only the use of nuclear weapons but the threat of use of nuclear weapons and in that conjunction of use and threat approached the dark heart of who we already are—we are building these weapons for a nation that has used them once, that states as official policy its intent to use them again even in first strike, that maintains by the thousands nuclear weapons deployed and on hair-trigger alert.

We live at the pinnacle of a war culture which says, bluntly, we will get our way by killing people. And our intention is not just a matter of policy but, as the baseless preemptive strike against Iraq makes clear, it is a course of action. We are pursuing the same course against other enemies, most obviously Iran.

Inasmuch as Environmental Impact Statements are required to consider social and cultural impacts, the Draft SPEIS, as it evaluates which communities should be host to new bomb production facilities, should address the profound impact on a community of doing work that is considered by our government to be abhorrent when other nations do it (what does a worker in a US weapons plant feel when the President of the United States threatens to obliterate Iran and its population for doing the very work this US worker does every day? Does it mean nothing? Does it have no impact on our communities?), and is considered by other nations to be a threat to all of creation.

A No Production Alternative

Purpose and Need

The National Environmental Policy Act requires federal officials to include all reasonable alternatives in the preparation of Environmental Impact Statements. In order to determine what alternatives are reasonable, federal officials must consider agency preferences and must conduct a public scoping process. 7|7O (cont)

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The result of the scoping process for the Complex 2030 SPEIS was unequivocal. The number of people who participated was unusually large—more than 33,000 comments were submitted into the record—and more than 90% of the comments urged consideration of a path away from weapons production and toward disarmament in keeping with US obligations under the Nonproliferation Treaty. 7|7O (cont

The Draft SPEIS does not present such an alternative. This deficiency should be rectified in the final SPEIS, which should include a fifth alternative (after No Action and the three others in the current draft): The Weapons Complex that produces No Bombs.

Before exploring this alternative, we should answer two questions: Is such an alternative reasonable? Could such an alternative meet the president's directive to secure our nation with the least possible number of bombs?

The first question can be answered in the affirmative. In fact, if we take seriously the commitments of the United States in the Nuclear Nonproliferation Treaty and the stated nonproliferation goals of the United States, a nuclear weapons complex that produces no bombs is not only reasonable, it is inevitable. This turns our question to timing, and we ask: is it reasonable to consider a weapons complex that produces no bombs now? 6|1F (cont)

The second question points toward security considerations. Is it possible to meet the demands of the president's directive "to secure our nation with the least possible number of bombs" with a weapons complex that produces no bombs? 14| 13A

In answering these questions we return to the published opinions of key strategists and long-time policy insiders, Henry Kissinger, George Shultz, Sam Nunn, William Perry, Thomas Graham and others. One of the distinguishing features of their call for a practical approach to nuclear disarmament is a sense of urgency —not only is it reasonable to contemplate moving in this direction now, it is imperative.

Kissinger and the others have come to this conclusion precisely because they see that our security requires it. In other words, their answer to our second question—Is it possible to meet the president's directive?—also goes beyond the standard of "reasonable" to imperative. Few would argue that the list of people who developed the nine practical steps outlined in the Wall Street Journal are willing to sacrifice US security needs in pursuit of nuclear disarmament. The least possible number of bombs that will secure our nation, in the future that these men and women believe can not come too soon, is zero. It is also the maximum number.

To deny the reasonableness of the No Production Alternative is to assert that the United States is not planning, in the next thirty years, to bring itself into full compliance with its obligations to pursue, in good faith, nuclear disarmament "at an early date." To deny the reasonableness of the No Production Alternative is to dismiss Kissinger, Shultz, Nunn, Perry and those who agree with them as "unreasonable."

Complex Transformation. In a world where the NPT is realized, what is left of the weapons production complexes of the Nuclear Weapons States will be an infrastructure and workforce dedicated to the disassembly, dismantlement, and disposal of weapons materials and components. This work will be conducted under international verification protocols in facilities that are transparent by design and safeguarded as far as possible from hostile attacks and disruption by natural phenomena.

What will a weapons complex that produces no bombs look like? Where will its facilities be located? What capabilities would be included? What workforce will be required and what skill sets must they have? What will be the impacts on the environment and

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the economies of the current weapons facilities?

The National Environmental Policy Act does not require the NNSA to make a weapons complex that produces no bombs a preferred alternative, but it does require such an alternative to be fully analyzed as a "reasonable" alternative.

7|7O (cont)

No Production Weapons Complex. Under the programmatic No Production Alternative, NNSA would continue to operate only those facilities required to achieve the safe, secure, efficient disassembly and dismantlement of nuclear weapons and the disposition/disposal of their constituent parts. Some facilities at each of the seven sites will be retired and infrastructure and funding will be required to assure their safe, secure and complete decontamination, decommissioning and destruction. Some sites may be closed entirely; others may require new construction to achieve efficiencies and improve safety.

Weapons Design and Certification. In a fully-compliant NPT world, the need for weapons design activities will disappear. Requirements will shift, some weapons design capacities will need to be maintained to address possible questions which arise during decommissioning, disassembly, dismantlement and disposition of the stockpile. Capabilities of the weapons labs may also be used in determining alternative uses for some materials or constituents currently used in nuclear weapons and addressing issues that may arise should such transformation activities be deemed advisable.

Maintaining three fully equipped national laboratories would not be necessary; consolidation of required laboratory-based activities in support of a No Production Alternative would result in considerable savings—economic as well as environmental, savings which could be dedicated to addressing environmental concerns at the sites which close.

Decisions about which of the three weapons labs should continue to operate in support of the No Production Alternative should be made on the basis of an analysis of the technologies available at each lab rather than considerations of politics.

15|5I

Plutonium Operations and Pit Manufacture. Plutonium operations requirements in a No Production Alternative would be reduced to questions of safe extraction, processing and disposal of plutonium currently in pits, in storage, or in other NNSA inventories. The location of such operations would be determined by an analysis of current technical and infrastructure capacities. Any facilities (new or upgraded) which conduct plutonium operations should incorporate transparency in their physical infrastructure as well as the processes in order to facilitate international verification of plutonium handling.

Activities required for plutonium currently in warheads would include: disassembly of warheads and pit removal; staging of pits awaiting further dismantlement; dismantlement of pits; safe and secure storage of pit materials until disposition activities are completed.

The plutonium itself should be placed under international monitoring and administrative control at the earliest possible moment.

The need for pit manufacture in an NPT-compliant, No Production world will be eliminated. Facilities currently available for pit production at Los Alamos would be given consideration for any role required in the disposition of plutonium from retired warheads or in other NNSA inventories.

All other plutonium facilities would be decommissioned and scheduled for demolition.

Uranium operations and Secondary and Case Fabrication. Uranium

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operations in support of disassembly, dismantlement and disposition regimes would be located at the Y12 Plant in Oak Ridge, Tennessee, where considerable infrastructure, including a Uranium storage facility under construction, currently exists. Y12 is the only currently operating site with the technical capacity to undertake large scale uranium operations.

Current facilities at Y12 would be analyzed for suitability for uranium processing; the question of upgrading aging facilities vs. construction of a new uranium processing facility will be made only after a thorough cost/benefit analysis. In either case—retrofitting an older facility or constructing a new facility—all facilities will have transparency "designed-in" in order to facilitate international inspection of all stages of the uranium operations and eventually, international possession of all HEU.

Given the nature of thermonuclear secondaries, it would be expected that similar operations with other constituents—lithium, beryllium, etc—would be co-located with uranium operations, though evaluation of other options which might provide efficiencies or improvements in safety or security could be considered.

Weapons Assembly/Disassembly and High Explosives Production. The need for High Explosives Production for nuclear weapons would no longer exist under the No Production Alternative. If questions exist about stability of behavior of high explosives during disassembly/dismantlement operations or in current stockpiles of HEX, some bench-scale facilities might be maintained until such time as questions are satisfactorily resolved.

7|7O (cont)

Weapons assembly operations would cease, and resources dedicated to assembly operations would transition to disassembly. Facilities for staging retired warheads awaiting disassembly, the actual physical disassembly, and staging constituent parts awaiting transportation or disposal would be co-located. While the Pantex facility seems an obvious choice to locate such facilities, consideration could be given to other sites which present efficiencies in operations or significantly reduce safety risks due to transportation. It does not seem likely that more than one facility would be required.

Category I/II SNM Storage. Co-location of storage facilities for some or all Category I/II materials under international administrative control will be analyzed in the SPEIS for a No Production Complex. Issues of safety and security which accompany transportation of Category I/II SNM will be evaluated against gains in efficiencies, safety, and long-term security before decisions are made.

16|5M

This evaluation should incorporate site-specific evaluations at facilities currently handling Category I/II SNM and then be made on a programmatic basis.

Tritium Production and R&D. Tritium production will no longer be necessary in a fully NPT compliant weapons complex. Tritium production activities at the Watts Bar Nuclear Plant in Tennessee will cease and TPBars will be decontaminated, decommissioned, and destroyed.

Tritium operations at Savannah River will be scaled back—tritium extraction will cease. Absent the possibility of economic benefit, if possible, tritium should be treated to render it unusable in weapons and any residual tritium-containing materials should be placed in safe, secure storage under international administrative control and monitored throughout its decay cycle.

17|6B

High Explosives R&D. High Explosives R&D will cease. See High Explosives Production above.

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Flight Test Operations. Flight Test Operations for nuclear weapons delivery systems will cease. Decontamination, decommissioning and environmental restoration of all facilities will take place.

7|7O (cont) Hydrodynamic Test Facilities. High explosive experiments to study weapons physics and assess the performance of nuclear weapons will no longer be necessary. If other, non-military uses can not be found for equipment and facilities, they will be decommissioned and demolished.

18|6C Major Environmental Test Facilities. Environmental facilities used to test nuclear weapons will no longer be necessary and will transition to non-weapons work or will be decommissioned and demolished.

Non-nuclear production. Under the No Production Alternative, the Kansas City Plant will be included in the SPEIS. Any facilities at the Kansas City Plant necessary to support safe and efficient disassembly, dismantlement and disposition of the stockpile will be maintained; the result will be a dramatically reduced footprint for the Kansas City operations. Current plans for moving the Kansas City Plant will be abandoned; funding currently allocated for relocation of the Kansas City Plant can be dedicated to addressing environmental concerns at the current operating facility.

Benefits of the No Production Alternative

The No Production Alternative minimizes environmental impacts and joined with effective political leadership, can be the most effective in reversing or at least remediating the effects of past negative environmental impacts.

The No Production Alternative can enhance the economic status of the communities in which facilities are located, directing the energy and efforts of the workforce toward dismantlement of warheads and of the apparatus and infrastructure of design, production and testing. With competent political leadership and an involved public, positive benefits will be realized and negative impacts will be minimized or eliminated.

The No Production Alternative is the only alternative that corresponds fully with the United States' obligations under the nuclear Nonproliferation Treaty and the finding of the World Court in 1996.

The No Production Alternative provides the leadership called for by arms control, diplomatic and military leaders.

The No Production Alternative enhances security for the United States by braking immediately the global momentum toward nuclear proliferation and increasing security for every country.

A Concern about responsiveness to public comments in the Scoping process

19|2A The Draft S-PEIS does not provide specific responses to specific comments received through the scoping process, instead it provides a summary of "major scoping comments" (1-21) and charts describing the assignment of comments into bins and campaigns which lump (Appendix D) comments together in huge chunks and provides generic responses. For me, at least, this is a first—in the past, Draft EIS's have reproduced comments and, at times, transcripts of hearings, and provided links to pertinent responses. The method used in the past, while demanding, provided the public with the assurance that their comments were received and considered.

The responses provided in the Draft C-Trans SPEIS do not supply that level of assurance.

My concern that some comments may have fallen into a separate bin, a dust bin, we might wonder, stems from the fact that the Oak Ridge

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19|2A (cont) Environmental Peace Alliance is not listed among the Public Interest Groups on the document distribution list (15-10 through 15-13). Furthermore, individuals who spoke at the public hearing in Oak Ridge are not listed in the Individuals list (15-15 through 15-28). The list suggests that those who submitted written comments separate from the hearing were included, but it appears those who spoke at the public hearing are not included (Ralph Hutchison, Tom Egan, Erik Johnson, Marcus Keyes to name just a sampling of the speakers who are not represented on the list).

My question is: What happened to the Oak Ridge hearing list/ transcript/comments?

Should the Department of Energy decide to pursue the clumping method of responding to public comments in the final EIS, I think at a minimum the public should have access to some paper record that demonstrates their specific comments were, in fact, considered.

I do not have the same concern for "campaigns" like post card campaigns or "click and send" e-mail campaigns. It seems to me that while these are important, and commenters should be noted and included for the record, insofar as the comments do not differ in substance, it makes sense to provide one generic response.

Ralph Hutchison, coordinator
submitted for the Oak Ridge Environmental Peace Alliance

Comments herein are in addition to other comments, written and spoken, submitted to DOE/NNSA by individual members of the Oak Ridge Environmental Peace Alliance and are not meant to replace or supplant any such comments.

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Comments of the Oak Ridge Environmental Peace Alliance
on the National Nuclear Security Administration's
Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement
(DOE/EIS 00236-S4)
April 2008

Request for Extension of Comment Period

Prior to the release of the Draft SPEIS, the Oak Ridge Environmental Peace Alliance joined with other members of the Alliance for Nuclear Accountability in November, 2007, to request an extended comment period of 120 days—our request was predicated on an expectation that the Draft SPEIS would be something less than a quick read. DOE instead established a comment period of 90 days; since that time, we have received the Draft SPEIS which is massive and contains a wide variety of technically demanding information.

Recently, the NNSA received additional requests for an extension of the comment period from members of Congress and the public but declined to extend the comment period.

The Oak Ridge Environmental Peace Alliance believes a comment period of 90 days is inadequate for members of the public (whose lives are not put on hold while they respond to the Draft SPEIS) to adequately analyze and respond to a document this voluminous, detailed and challenging.

We are asking DOE/NNSA to reconsider its decision not to extend the comment period and to announce an additional 60 day comment period to permit further public comment.

The Fundamental Question

An Environmental Impact Statement starts with a statement of the purpose and need for the proposed action. Absent a persuasive case that the action under consideration is truly needed to achieve a legitimate and legal purpose, any EIS would be rendered moot and should be discontinued.

Given that the primary justification for the "transformation" of the nuclear weapons complex has been called into question by Congress, it is worth examining carefully the arguments put forward in the document to justify a new nuclear weapons complex.

Remarkably, the justifications are predicated not principally but *only* on the requirement of the President's Nuclear Posture Review of 2001—six years ago. The Nuclear Posture Review is the document that consolidates the advice and wisdom of a variety of experts—military, arms control, diplomatic, technical—and articulates in detail the nuclear weapons strategy, force structure and policy of the United States. In response to the NPR of 2001, the National Nuclear Security Administration has determined, six years later, that a new nuclear weapons complex is necessary to achieve "a credible nuclear deterrent with the lowest-possible number of nuclear warheads consistent with our national security needs." (Draft SPEIS, S-9)

Last year the National Nuclear Security Administration presented in broad strokes its outline for the transformation of the nuclear weapons complex and production of the Reliable Replacement Warheads to Congress in making its annual budget request. In response, Congress said it is time

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to update the Nuclear Posture Review in order to determine what kind of infrastructure is, in fact, necessary to guarantee our national security.

Absent that re-examination, it is reasonable to argue that the current process is premature and should be put on hold pending the completion of a new Nuclear Posture Review. That seems unlikely; those who want this project to go forward feel compelled to push to bring it to a conclusion under the current Administration, NNSA Director Thomas D'Agostino recently noting he felt "a sense of urgency" to push Complex Transformation through.

We are not, however, unable to undertake any analysis of the purpose and need in the absence of a new Nuclear Posture Review. We can imagine a review of US policy and strategy prepared by a commission that would include leading experts in the field of arms control, national security, defense and diplomacy. We can imagine their analysis and views were met with widespread concurrence by others experienced in policy and strategy throughout our government and around the world. The report of such a commission would undoubtedly take center stage in the discussion phase of the next Nuclear Posture Review. There is nothing controversial about our fantasy.

From the findings of this commission, we could reasonably speculate about what kind of nuclear weapons complex would be required to achieve security for our nation, and from there, we could reasonably address the core motivation of the NNSA as it prepares a document outlining possible alternative future weapons complex configurations that meet the president's goal of "the lowest-possible number of nuclear warheads" required to guarantee the security of the United States.

Imagine these wise men and women publishing their words not in a super-secret classified Nuclear Posture Review, but in the pages of the *Wall Street Journal*.

Now, we can stop imagining. It has happened. In January 2008, former Secretary of State and National Security Adviser Henry Kissinger, former Secretary of State and Bechtel corporate officer George Shultz, former Secretary of Defense and Admiral William Perry, and former chair of the Senate Arms Services Committee Sam Nunn wrote their second op-ed piece in the *Journal* outlining their views on future nuclear policy and strategy. Among those who support their views are Madeleine Albright, Richard V. Allen, James A. Baker III, Samuel R. Berger, Zbigniew Brzezinski, Frank Carlucci, Warren Christopher, William Cohen, Lawrence Eagleburger, Melvin Laird, Anthony Lake, Robert McFarlane, Robert McNamara and Colin Powell.

This list includes no one particularly distinguished by liberal or pacifist views; it represents the defense and national security apparatus that has shaped and carried out US security policy over the last forty years. It is solidly bi-partisan and completely establishment.

These leaders, whose words will, in fact, be instrumental in formulating US policy, strategy, force structure and infrastructure requirements in the next Nuclear Posture Review, have embraced a vision of a world free of reliance on nuclear weapons for security. They quote Mikhail Gorbachev: "It is becoming clearer that nuclear weapons are no longer a means of achieving security; in fact, with every passing year they make our security more precarious."

They quote the United Kingdom's foreign secretary, Margaret Beckett: "What we need is both a vision—a scenario for a world free of nuclear weapons—and action—progressive steps to reduce warhead numbers and to limit the role of nuclear weapons in security policy. These two strands are separate but they are mutually reinforcing. Both are necessary, but at the moment too weak."

This is the world we live in, at least most of us. The peace movement has been on the leading

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edge of this realization; it appears that the political leaders are catching up; we hope it is not too late.

Here is what Kissinger, Shultz and company say in their own words: "With nuclear weapons more widely available, deterrence is decreasingly effective and increasingly hazardous."

This, obviously, calls into question the fundamental premise of the 2001 Nuclear Posture Review which motivates this document and reveals that the Complex Transformation Draft SPEIS and the alternatives it considers are anchored in a past which is "no longer operable."

These new and unexpected abolitionists convened a conference in October 2007 at the Hoover Institute, a right-wing think tank, which they describe as having general agreement about the importance of the "vision of a world free of nuclear weapons as a guide to our thinking about nuclear policies, and about the importance of a series of steps that will pull us back from the nuclear precipice."

This is important. In January 2007 these authors published their views for the first time. In the intervening twelve months, they saw their vision gather support around the world, not because their rhetoric was irresistible, but because the wisdom behind their words is compelling. In January 2008, they put flesh on their vision, proposing those practical steps that will lead the world, in their words, back from the nuclear precipice.

The US and Russia, they say, possessing almost 95% of the world's nuclear warheads, have "a special responsibility, obligation, and experience to demonstrate leadership."

Among the steps they call for are the universal application of monitoring compliance with the Nuclear Nonproliferation Treaty and the consolidation of weapons designed for forward deployment "as a first step toward careful accounting for them and their eventual elimination."

They call for an international dialogue, including nuclear and non-nuclear weapons states, to address "turning the goal of a world without nuclear weapons into a practical enterprise among nations, by applying the necessary political will to build an international consensus on priorities."

This brings us to a fifth alternative which must be considered in detail in the Environmental Impact Statement before it can be considered complete, an alternative that thousands of people advocated in the scoping process, yet the NNSA did not see fit to present it in the Draft SPEIS. *The Draft SPEIS on Complex Transformation must consider a nuclear weapons complex that produces no nuclear weapons.* (See No Production Alternative, below)

No refurbishing of aging weapons, no design or production of new weapons, no stockpile life extension program. None. This is the only legitimate path to disarmament; it is the only conceivable alternative that supports the stated nonproliferation goals of the United States; it is the only alternative that has any chance of being recognized by the international community as being consistent with our obligations under the nuclear Nonproliferation Treaty.

The obvious truth at this moment is that Congress is right—the 2001 Nuclear Posture Review is history. The SPEIS on Complex Transformation, contemplating a future predicated on the vision of a world still threatened by the policy of deterrence, is either a complete waste of time or the most perilous course imaginable.

That's why tens of thousands wrote and spoke during the scoping process and why tens of

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thousands more will comment during this process. We dare not take the chance that these terribly dangerous plans will die of their own weight. We advocate creating a future in step with the momentum of the world; we recognize that being guided by a vision that is no longer in step with the world will doom us to future that depends on an economic machine that is rotting from within.

For years people arriving in Oak Ridge were met at the city's boundary with a sign that said "The Vision Lives On." I never quite knew what it meant—if the sign referred to a vision of progress through scientific discovery, I think it may still be a good theme for the community to rally around. But if the sign meant "national security through nuclear weapons," then it's time to take the sign down. That vision does not live on.

Programmatic means the whole program

The Draft SPEIS does not consider the potential impact of decisions stemming from the SPEIS on operations at DOE's Kansas City Plant. Currently DOE is pushing to complete an Environmental Assessment and issue a Finding of No Significant Impact on the relocation of the Kansas City Plant.

The Complex Transformation ROD may significantly affect the requirements of any operations at the Kansas City Plant—DOE's rationale that the KCP is non-nuclear and therefore not impacted by decisions in the C-Trans SPEIS fails to consider a No Production Alternative (see below) which would have a dramatic impact on the Kansas City Plant and completely eliminate the need for an expensive relocation of the facilities there.

Similarly, decisions about relocating or co-locating other pieces of the nuclear weapons complex could impact the size and extent of operations at the Kansas City Plant in ways that would significantly alter considerations currently included in the EA being prepared. The range of production capacities in the current Draft SPEIS seem to be 50-200, and the "Complex of the Future" may or may not have the capacity to produce new design nuclear warheads. Clearly, decisions which impose limits on the number or type of warheads will affect the capacity requirements for the Kansas City Plant.

Technical justification

There is no technical driver for Complex Transformation, and the truth of this has been demonstrated by the constant shifting of the statements of "justification" provided by the NNSA.

First, the NNSA declared we needed the new weapons complex to design and build new bombs, and we needed to do this to maintain a reliable arsenal. Our current—old—arsenal relied on plutonium pits that would degrade over time, so we need a new, more reliable design.

This was the argument put forward by the scientists from the lab and the administrators who direct the labs. They carried the message to Washington and lined up politicians—we have to have Reliable Replacement Warheads.

They held fast to this justification, really, right up until the JASON report that found, after careful examination, that there was no aging issue with plutonium pits. In response to the JASON report in November 2006, the NNSA announced plutonium pits could be considered reliable for 85-100 years, nearly doubling previous estimates.

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What are we to make of this? Are the JASON folks just smarter than the lab folks, the Administrators and Pete Domenici? Did they have access to some even more secret information than the weapons designers themselves?

No, of course not.

So why were the weapons labs questioning the reliability of the current arsenal, saying national security would be compromised without this new RRW?

The only answers available are not nice ones:

A. They didn't do their homework, at least not as well as the JASON folks.

B. They were putting considerable spin on the "facts" in order to make a case for more money to keep the labs going.

C. They sincerely, incompetently and wrongly believed plutonium pits had aging issues that compromised the reliability of the stockpile.

D. They were lying to get money for their latest tech toy and were willing to undermine US nonproliferation efforts at place the planet at increased risk for the money.

E. They just like to build bombs. It's what they know how to do.

In one sense, it doesn't matter now what their reasons for making the argument were. That argument evaporated in the face of the JASON report.

In another sense, though, it might matter a lot. Because now we have to hear all the arguments about the need for new warheads, the need for new bomb plants, the need for…anything, really, with considerable skepticism in light of what we know about their commitment to the truth as balanced against their commitment to pork, to the money.

That said, it is still important that the record is clear: to date, no legitimate technical justification for this program has been established.

Economic impacts

Consideration of economic impacts must address questions which are not simple.

First, what is the economic impact of the alternatives on the communities most directly involved? The Alternatives in the Draft SPEIS present a variety of scenarios to communities like Oak Ridge. Under one alternative, your community will see a huge influx of construction dollars; under another, not so much. And some are in-betweeners.

Consideration must be given, too, though, to the unseen economic impacts. Does it affect the local economy to have a facility which produced weapons of mass destruction as a significant piece of its economic base? How do we account for the reputation of a community plagued with legacy contamination when it comes time to recruit other businesses?

Since the earliest days of the Manhattan Project, production schedules and the money that followed them have driven the agenda at Y12 and other bomb plants. In the competition for federal dollars, cleanup dollars have always competed with production dollars—for that matter,

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according to Oak Ridge officials, even within Defense Programs money for dismantlement and disposition competes with production for funding.

So we have to ask: how would each of the proposed alternatives affect our community—would they assist us in diversifying our economic base? Would they encourage a greater and more reliable commitment to environmental restoration? Would they enhance the image of Tennessee's resource valley as a progressive, healthy place to locate one's business and raise one's children.

Each of the alternatives in this SPEIS present a mixed economic forecast. We can guess about how many tax dollars each of them might bring to Oak Ridge, but we can not as easily assess the cost to our community, except to say there is one, and it is not insignificant.

A fifth alternative—a nuclear weapons plant that produced no nuclear weapons—might present a more attractive economic outlook to the community. A nuclear weapons plant that produces no nuclear weapons still has a mission, one which is critical for US and global security. The No Production Y12 would be responsible for safely dismantling and disposing of nuclear weapons components as they are returned from the retiring stockpile. As a DOE official once said, "We need the same trained workforce to take them apart as to put them together. It takes the same wrench, we just turn it the other way."

So, imagining a twenty-five to thirty year workload of weapons dismantlement and disposition work, we can forecast a possible "no job loss" future for the No Production Y12. Of course, this places a burden on our political leaders—they have to make the compelling case in Washington, DC, with our support—that this work is critically important. But it seems conceivable, with the support of people like Henry Kissinger and George Shultz and Sam Nunn, that the case could be convincingly made. And they have to make the case that Oak Ridge is the place to continue to do it—this seems an even easier case to make.

Now the other parts of the economic picture can fall in to place. The No Production Y12 Alternative includes aggressive cleanup of legacy contamination—some still at large in the environment, like mercury, and some in "storage," like the Walk-in pits. If Y12 is to be a state-of-the-art facility, conducting weapons dismantlement and disarmament in a fully safeguarded, verifiably transparent manner, it should insist on a full commitment to safeguard employees at work and at home nearby from threats from legacy contamination. In other words, clean the place up.

When you go to the tire store to buy tires or get your oil changed, they put an "environmental fee" on your bill, to pay for the cost of disposing of the waste. It's not a scam—it's an effort to factor in the full cost of doing business. Same for nuclear weapons.

Economic analyses must include cost/benefit calculations that itemize not only the assets provided (or withheld) from any community considered as a possible host to any site in the Alternatives, the calculations must also at least summarize the debits—the economic downside that adheres to a generally unattractive industrial operation which presents a clear target for hostile attack, the potential for catastrophic environmental releases or accidents, and the stigma attaching to the production of weapons of mass destruction.

Finally, there is the potential economic benefit to be realized from marketing a new kind of bomb plant, one which is engaged not in a vain effort to procure security for the US, but one which is truly doing the swords-to-plowshares work that would be internationally recognized as beneficial to all the world. Rather than hide our work in secrecy, we could proclaim it proudly. Imagine recruiting the best and brightest to our community to join in this work, to be in the vanguard of those working to remove the nuclear threat and secure the globe from the threat of nuclear annihilation. It doesn't take much of a wordsmith to realize you could frame those recruiting pitches in pretty inspiring ways.

Secondly, what is the economic impact on communities not directly involved?

Over the past 65 years, communities that built the nation's atomic and nuclear weapons have received disproportionately large shares of federal funding—we get way more than we put

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in, in other words. Hence the Cadillac school system in a state that consistently ranks near the bottom of national charts in education. And the superpool and all the other amenities that distinguish Oak Ridge from other towns its size in Tennessee.

But the national budget—Iraq war aside—tends toward being a zero sum game. If we spend money in one place, we don't have it to spend in another.

So a comprehensive economic analysis in an environmental impact statement must look not only at the possible benefits to the local community, but must evaluate those benefits in light of their impact on other communities and the nation as a whole. This, of course, was raised in the scoping process, but, again, did not find its way into the Draft SPEIS.

What does it mean to the nation that the third Congressional District in Tennessee ranks in the top five districts in the United States in the number of federal dollars raked in since 1940? What does it mean to Tennessee—to our children over the last generations—that tens of billions of dollars have been devoted to building nuclear weapons which we put in the ground or on subs and never use rather than to building schools? More specifically, why do communities in East Knoxville compete for half a million dollars in Empowerment Zone funding when, just twenty-five miles west, the federal government is pouring a billion dollars a year into bomb building—more under some of the proposals in the Draft SPEIS?

Do we think this just doesn't matter? Or that the money is just our share? Does the economic analysis in the Draft SPEIS tell us where the money really goes? If Oak Ridge has received billions of dollars in the last ten years, where is it? In the collapsed shopping mall? In the un-staffed crosswalks at our public schools? In gleaming new buildings at Y12? The people of this community deserve to know exactly where all this money is going, and any salient economic analysis would tell them.

The Final SPEIS, in considering a No Production alternative, must present a full economic analysis which includes benefits as well as costs to the local community in the context of a larger economic analysis that looks at the needs of our state and nation.

Environmental impacts

Since the decision being analyzed in this Draft SPEIS is programmatic, any assessment of the impacts on the natural environment must be equally broad in scope.

Environmental impacts have historically been assessed "from cradle to grave." In this case, the potential for environmental impacts must be assessed not only for the design/production/testing processes themselves, but also for the potentially devastating effects of a complete release of contaminants used in the design/production/testing processes from a variety of possible release events: a catastrophic accident, an accidental release, a natural disaster, a hostile attack, use of purloined contaminants in an attack by hostile forces (a dirty bomb which might spread uranium, beryllium, lithium deuteride…), theft and dispersal by a disgruntled employee, failure of support systems (the anhydrous hydrogen fluoride system at Y12, for instance).

Any of these events which dispersed contamination into the atmosphere would, in the case of any of the Alternatives under consideration by DOE, add to the burden already borne by the environment, workers and off-site public from previous releases.

The Y12 site in Oak Ridge, for instance, is a Superfund site; over the past sixty years it has been responsible for the largest release of mercury to the environment in human history. Groundwater to the west of the Y12 site has been contaminated by hazardous chemicals and radionuclides, and the aquifer below Y12 is contaminated with nitrates, solvents (tricholoroethene and others), radionuclides (uranium and technetium99) and heavy metals (uranium, cadmium, strontium). Wells to the east of Y-12 contain volatile organics like benzene and toluene and a murderer's row of metals: boron, beryllium, cobalt, copper, chromium, lead, lithium, mercury, manganese, nickel and uranium. [Y12 Site-Wide EIS]

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Here is just a partial list of the scope of contamination, with some reference to accidents and other events which contribute to the contamination problems. While no complete documentation of Y12 contaminant releases exists (at least in an unclassified form), and no comprehensive record of accidents and incidents exists, the following presents enough of a record to make the point—neither the processes nor the personnel at Y12 can be expected to be free from error, and in the case of nuclear weapons, errors can have dramatic consequences.

From a 1994 report by researchers from the Oak Ridge National Laboratory: "Airborne mercury in the Y-12 area results from several sources, including vaporization from contaminated soil, fugitive emissions, coal combustion at the Y-12 plant, and legacy mercury contamination."

From a news report in December, 2007: "The Department of Energy's Office of Inspector General states that Y-12 management had not 'consistently implemented' controls for beryllium contamination - especially when the contamination was found outside designated beryllium work areas."

From a news report in September 2007: August 14, 2007 and August 16, 2007 radiation contamination events at Y12 resulting in worker exposures, apparently to uranium.

From a USGS study in 1989: "Contaminants were found in water samples from several of the wells in concentrations which equaled or exceeded drinking-water standards established by the US Environmental Protection Agency are antimony, chromium, lead, mercury, selenium, phenols, and strontium-90. Total and dissolved uranium concentrations exceeded the analytical detection limit in nearly 70% of the wells in the flood plain. The results of water quality determinations demonstrate that elevated concentrations of most trace metals (and possibly organic compounds and radionuclides) were caused by contaminated sediments in the samples."

A 2005 report from the Tennessee Department of Environment and Conservation: "A groundwater plume contaminated with nitrates, uranium-238, and other radionuclides and metals underlies the central complex area. This plume originates from the S-3 Ponds (on the divide with Bear Creek Valley Watershed) and from other sources within the complex.

It is certainly fair to draw some simple conclusions from this list: Contamination from historical operations is significant and uncontained, especially in the groundwater. Contaminants have moved off site and are no doubt continuing to move off site.

Any environmental evaluation of the Y12 site for a future role in the context of the "big picture" must assess the clear conflict between a dedicated effort to clean up historic contamination and the continued operation of a high-priority production facility. As noted in scoping comments, the presence of an operating weapons production facility and the levels of security necessary to operate such a facility at the very least inhibit current efforts to remediate contamination from the past.

While it may be impossible to predict the frequency, nature, or severity of releases from accidents or events on site, the following list should persuade any reasonable person that events and accidents will undoubtedly occur:

From Sept 22, 2006, a report of a uranium fire in a glovebox—the report was withheld from the public for several weeks. In January of 2008, the Defense Nuclear Facilities Safety Board criticized plant officials for their investigation and response to a fire in the 9212 complex.

From a 2007 report by Robert Alvarez on safety at Y12 documenting significant workplace incidents in just the last decade:

2 July 1997: waste drum explosion
30 July 1997: waste drum explosion
7 August 1997: explosion and fire in chemical reaction vessel
5 August 1998: brine pump explosion; one operator receives minor cuts on the face and chest from flying glass.
Late 1990s: four high-voltage cable explosions
31 March 1999: lithium explosion
8 December 1999: chemical explosion in a building housing depleted uranium. Eleven

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workers are injured and three hospitalised
14 December 1999: lithium hydride fire
11 January 2000: laboratory explosion
19 October 2001: electrical explosion. A 2300-volt cable short-circuits, blowing out every window in building 9404-1
January 2002: waste drum explosion
October 2002: uranium fire. Powdered uranium ignites after being stored in a glovebox for 10 years
15 April 2003: glovebox explosion and fire in building 9202
Week of 22 August 2003: electrical fire in building 9202
13 November 2003: electrical fire
22 April 2004: fire in laboratory in building 9995. The Y-12 fire department is not notified until more than 1 hour after initial observation of the fire.
22 November 2005: fire in special materials processing building One worker requires medical attention.
16 March 2006: electric motor fire in special material processing building
22 September 2006: uranium container fire

From a December 2005 news report: "A process filter that went unchanged for nearly 20 years at the Y-12 nuclear weapons plant contained about 1,800 grams of U-235 -- more than 10 times as much as indicated by an in-place monitoring system. The surprising load of uranium prompted an internal investigation at Y-12 and questions from a federal safety board. An Aug. 19 memo by the Defense Nuclear Facilities Safety Board said the amount of U-235 -- the fissile isotope of uranium used in warheads -- exceeded the 'action level' for nuclear criticality safety."

Clearly the Y12 facility is not exempt from operational deficiencies, whether due to human error, equipment malfunction, or inadequate planning or implementation of operational procedures. The final EIS must do a careful and thorough analysis of the potential for significant environmental impacts on-site and off-site, from events, incidents and accidents.

Moral considerations

Any number of the concerns expressed in the comments above draw us inexorably toward the moral dimension of nuclear weapons production. The decision to divert resources from social programs to nuclear weapons programs has a moral dimension; the decision to tolerate a certain level of injury to the natural environment as a consequence of production activities has a moral dimension. Even the framing of a justification for the selection of alternatives, each of which proposes the US pursue a "do as we say, not as we do" nonproliferation agenda, has a moral dimension.

These factors impact the social and cultural health of the community which hosts a bomb plant—they are part of the "environment" which should be considered in an environmental impact statement, but which are absent from the Draft SPEIS.

To neglect them, though, is to carve out a piece of our living environment as though it does not come in to play or does not matter, neither of which are true.

And looming over all these questions, in any cradle to grave consideration of nuclear weapons production—the program which motivates the "programmatic" environmental impact statement, is the big one: should these bombs be used, what will it do to us as human beings? Some millions of us, of course, will be gone, vanished in an instant, turned to vapor and ash. With us will go our culture, our libraries, our pets, our marriages, our children, our homes, streets, bridges, plumbers, doctors, electricians, teachers, schools, banks, parks, trees, flowers, insects, hummingbirds, insurance companies, hospitals, churches, mosques, crucifixes, menorahs—everything that is the environment in which we live.

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Some of us may survive, entire cities perhaps. What will it do to them? What would it do to us, in Oak Ridge, if our bombs were used to annihilate one billion people in North Korea, or three billion people in China, or even a hundred million in Russia or twelve million people in Tehran? If we wiped nine hundred square miles of Afghanistan or Pakistan or Iran clean of all life, all people, all animals, all vegetation, rendered it uninhabitable for centuries? Who would look back at us from the mirror? How would our identities be changed, redefined, in that instant when we knew what we had done? When CNN showed us the missiles rising into the sky and our children turned to us asking us the meaning of it, how will we answer when we no longer know who we are?

This, of course, is the crux of the objection to nuclear weapons from a moral standpoint. An exchange of nuclear weapons will change the nature of humanity in a fundamental way; even ethics itself will be murdered.

In its wise decision in 1996, the International Court of Justice in the Hague (the World Court) drew together not only the use of nuclear weapons but the threat of use of nuclear weapons and in that conjunction of use and threat approached the dark heart of who we already are—we are building these weapons for a nation that has used them once, that states as official policy its intent to use them again even in first strike, that maintains by the thousands nuclear weapons deployed and on hair-trigger alert.

We live at the pinnacle of a war culture which says, bluntly, we will get our way by killing people. And our intention is not just a matter of policy but, as the baseless preemptive strike against Iraq makes clear, it is a course of action. We are pursuing the same course against other enemies, most obviously Iran.

Inasmuch as Environmental Impact Statements are required to consider social and cultural impacts, the Draft SPEIS, as it evaluates which communities should be host to new bomb production facilities, should address the profound impact on a community of doing work that is considered by our government to be abhorrent when other nations do it (what does a worker in a US weapons plant feel when the President of the United States threatens to obliterate Iran and its population for doing the very work this US worker does every day? Does it mean nothing? Does it have no impact on our communities?), and is considered by other nations to be a threat to all of creation.

A No Production Alternative

Purpose and Need

The National Environmental Policy Act requires federal officials to include all reasonable alternatives in the preparation of Environmental Impact Statements. In order to determine what alternatives are reasonable, federal officials must consider agency preferences and must conduct a public scoping process.

The result of the scoping process for the Complex 2030 SPEIS was unequivocal. The number of people who participated was unusually large—more than 33,000 comments were submitted into the record—and more than 90% of the comments urged consideration of a path away from weapons production and toward disarmament in keeping with US obligations under the Nonproliferation Treaty.

The Draft SPEIS does not present such an alternative. This deficiency should be rectified in the final SPEIS, which should include a fifth alternative (after No Action and the three others in the current draft): The Weapons Complex that produces No Bombs.

Before exploring this alternative, we should answer two questions: Is such an alternative reasonable? Could such an alternative meet the president's directive to secure our nation with the least possible number of bombs?

Hutchison, Ralph
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The first question can be answered in the affirmative. In fact, if we take seriously the commitments of the United States in the Nuclear Nonproliferation Treaty and the stated nonproliferation goals of the United States, a nuclear weapons complex that produces no bombs is not only reasonable, it is inevitable. This turns our question to timing, and we ask: is it reasonable to consider a weapons complex that produces no bombs *now*?

The second question points toward security considerations. Is it possible to meet the demands of the president's directive "to secure our nation with the least possible number of bombs" with a weapons complex that produces no bombs?

In answering these questions we return to the published opinions of key strategists and long-time policy insiders, Henry Kissinger, George Shultz, Sam Nunn, William Perry, Thomas Graham and others. One of the distinguishing features of their call for a practical approach to nuclear disarmament is a sense of urgency—not only is it reasonable to contemplate moving in this direction now, it is imperative.

Kissinger and the others have come to this conclusion precisely because they see that our security requires it. In other words, their answer to our second question—Is it possible to meet the president's directive?—also goes beyond the standard of "reasonable" to imperative. Few would argue that the list of people who developed the nine practical steps outlined in the *Wall Street Journal* are willing to sacrifice US security needs in pursuit of nuclear disarmament. The least possible number of bombs that will secure our nation, in the future that these men and women believe can not come too soon, is zero. It is also the maximum number.

To deny the reasonableness of the No Production Alternative is to assert that the United States is not planning, in the next thirty years, to bring itself into full compliance with its obligations to pursue, in good faith, nuclear disarmament "at an early date." To deny the reasonableness of the No Production Alternative is to dismiss Kissinger, Shultz, Nunn, Perry and those who agree with them as "unreasonable."

Complex Transformation. In a world where the NPT is realized, what is left of the weapons production complexes of the Nuclear Weapons States will be an infrastructure and workforce dedicated to the disassembly, dismantlement, and disposal of weapons materials and components. This work will be conducted under international verification protocols in facilities that are transparent by design and safeguarded as far as possible from hostile attacks and disruption by natural phenomena.

What will a weapons complex that produces no bombs look like? Where will its facilities be located? What capabilities would be included? What workforce will be required and what skill sets must they have? What will be the impacts on the environment and the economies of the current weapons facilities?

The National Environmental Policy Act does not require the NNSA to make a weapons complex that produces no bombs a preferred alternative, but it does require such an alternative to be fully analyzed as a "reasonable" alternative.

No Production Weapons Complex. Under the programmatic No Production Alternative, NNSA would continue to operate only those facilities required to achieve the safe, secure, efficient disassembly and dismantlement of nuclear weapons and the disposition/disposal of their constituent parts. Some facilities at each of the seven sites will be retired and infrastructure and funding will be required to assure their safe, secure and complete decontamination, decommissioning and destruction. Some sites may be closed entirely; others may require new construction to achieve efficiencies and improve safety.

Weapons Design and Certification. In a fully-compliant NPT world, the need for weapons design activities will disappear. Requirements will shift, some weapons design capacities will need to be maintained to address possible questions which arise during decommissioning, disassembly, dismantlement and disposition of the stockpile. Capabilities of the weapons labs

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may also be used in determining alternative uses for some materials or constituents currently used in nuclear weapons and addressing issues that may arise should such transformation activities be deemed advisable.

Maintaining three fully equipped national laboratories would not be necessary; consolidation of required laboratory-based activities in support of a No Production Alternative would result in considerable savings—economic as well as environmental, savings which could be dedicated to addressing environmental concerns at the sites which close.

Decisions about which of the three weapons labs should continue to operate in support of the No Production Alternative should be made on the basis of an analysis of the technologies available at each lab rather than considerations of politics.

Plutonium Operations and Pit Manufacture. Plutonium operations requirements in a No Production Alternative would be reduced to questions of safe extraction, processing and disposal of plutonium currently in pits, in storage, or in other NNSA inventories. The location of such operations would be determined by an analysis of current technical and infrastructure capacities. Any facilities (new or upgraded) which conduct plutonium operations should incorporate transparency in their physical infrastructure as well as the processes in order to facilitate international verification of plutonium handling.

Activities required for plutonium currently in warheads would include: disassembly of warheads and pit removal; staging of pits awaiting further dismantlement; dismantlement of pits; safe and secure storage of pit materials until disposition activities are completed.

The plutonium itself should be placed under international monitoring and administrative control at the earliest possible moment.

The need for pit manufacture in an NPT-compliant, No Production world will be eliminated. Facilities currently available for pit production at Los Alamos would be given consideration for any role required in the disposition of plutonium from retired warheads or in other NNSA inventories.

All other plutonium facilities would be decommissioned and scheduled for demolition.

Uranium operations and Secondary and Case Fabrication. Uranium operations in support of disassembly, dismantlement and disposition regimes would be located at the Y12 Plant in Oak Ridge, Tennessee, where considerable infrastructure, including a Uranium storage facility under construction, currently exists. Y12 is the only currently operating site with the technical capacity to undertake large scale uranium operations.

Current facilities at Y12 would be analyzed for suitability for uranium processing; the question of upgrading aging facilities vs. construction of a new uranium processing facility will be made only after a thorough cost/benefit analysis. In either case—retrofitting an older facility or constructing a new facility—all facilities will have transparency "designed-in" in order to facilitate international inspection of all stages of the uranium operations and eventually, international possession of all HEU.

Given the nature of thermonuclear secondaries, it would be expected that similar operations with other constituents—lithium, beryllium, etc—would be co-located with uranium operations, though evaluation of other options which might provide efficiencies or improvements in safety or security could be considered.

Weapons Assembly/Disassembly and High Explosives Production. The need for High Explosives Production for nuclear weapons would no longer exist under the No Production Alternative. If questions exist about stability of behavior of high explosives during disassembly/dismantlement operations or in current stockpiles of HEX, some bench-scale facilities might be maintained until such time as questions are satisfactorily resolved.

Weapons assembly operations would cease, and resources dedicated to assembly operations would transition to disassembly. Facilities for staging retired warheads awaiting

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disassembly, the actual physical disassembly, and staging constituent parts awaiting transportation or disposal would be co-located. While the Pantex facility seems an obvious choice to locate such facilities, consideration could be given to other sites which present efficiencies in operations or significantly reduce safety risks due to transportation. It does not seem likely that more than one facility would be required.

Category I/II SNM Storage. Co-location of storage facilities for some or all Category I/II materials under international administrative control will be analyzed in the SPEIS for a No Production Complex. Issues of safety and security which accompany transportation of Category I/II SNM will be evaluated against gains in efficiencies, safety, and long-term security before decisions are made.

This evaluation should incorporate site-specific evaluations at facilities currently handling Category I/II SNM and then be made on a programmatic basis.

Tritium Production and R&D. Tritium production will no longer be necessary in a fully NPT compliant weapons complex. Tritium production activities at the Watts Bar Nuclear Plant in Tennessee will cease and TPBars will be decontaminated, decommissioned, and destroyed.

Tritium operations at Savannah River will be scaled back—tritium extraction will cease.

Absent the possibility of economic benefit, if possible, tritium should be treated to render it unusable in weapons and any residual tritium-containing materials should be placed in safe, secure storage under international administrative control and monitored throughout its decay cycle.

High Explosives R&D. High Explosives R&D will cease. See High Explosives Production above.

Flight Test Operations. Flight Test Operations for nuclear weapons delivery systems will cease. Decontamination, decommissioning and environmental restoration of all facilities will take place.

Hydrodynamic Test Facilities. High explosive experiments to study weapons physics and assess the performance of nuclear weapons will no longer be necessary. If other, non-military uses can not be found for equipment and facilities, they will be decommissioned and demolished.

Major Environmental Test Facilities. Environmental facilities used to test nuclear weapons will no longer be necessary and will transition to non-weapons work or will be decommissioned and demolished.

Non-nuclear production. Under the No Production Alternative, the Kansas City Plant will be included in the SPEIS. Any facilities at the Kansas City Plant necessary to support safe and efficient disassembly, dismantlement and disposition of the stockpile will be maintained; the result will be a dramatically reduced footprint for the Kansas City operations. Current plans for moving the Kansas City Plant will be abandoned; funding currently allocated for relocation of the Kansas City Plant can be dedicated to addressing environmental concerns at the current operating facility.

Benefits of the No Production Alternative

The No Production Alternative minimizes environmental impacts and joined with effective political leadership, can be the most effective in reversing or at least remediating the effects of past negative environmental impacts.

The No Production Alternative can enhance the economic status of the communities in which facilities are located, directing the energy and efforts of the workforce toward dismantlement of warheads and of the apparatus and infrastructure of design, production and

Hutchison, Ralph
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testing. With competent political leadership and an involved public, positive benefits will be realized and negative impacts will be minimized or eliminated.

The No Production Alternative is the only alternative that corresponds fully with the United States' obligations under the nuclear Nonproliferation Treaty and the finding of the World Court in 1996.

The No Production Alternative provides the leadership called for by arms control, diplomatic and military leaders.

The No Production Alternative enhances security for the United States by braking immediately the global momentum toward nuclear proliferation and increasing security for every country.

A Concern about responsiveness to public comments in the Scoping process

The Draft S-PEIS does not provide specific responses to specific comments received through the scoping process, instead it provides a summary of "major scoping comments" (1-21) and charts describing the assignment of comments into bins and campaigns which lump (Appendix D) comments together in huge chunks and provides generic responses. For me, at least, this is a first—in the past, Draft EIS's have reproduced comments and, at times, transcripts of hearings, and provided links to pertinent responses. The method used in the past, while demanding, provided the public with the assurance that their comments were received and considered.

The responses provided in the Draft C-Trans SPEIS do not supply that level of assurance.

My concern that some comments may have fallen into a separate bin, a dust bin, we might wonder, stems from the fact that the Oak Ridge Environmental Peace Alliance is not listed among the Public Interest Groups on the document distribution list (15-10 through 15-13). Furthermore, individuals who spoke at the public hearing in Oak Ridge are not listed in the Individuals list (15-15 through 15-28). The list suggests that those who submitted written comments separate from the hearing were included, but it appears those who spoke at the public hearing are not included (Ralph Hutchison, Tom Egan, Erik Johnson, Marcus Keyes to name just a sampling of the speakers who are not represented on the list).

My question is: *What happened to the Oak Ridge hearing list/transcript/comments?*

Should the Department of Energy decide to pursue the clumping method of responding to public comments in the final EIS, I think at a minimum the public should have access to some paper record that demonstrates their specific comments were, in fact, considered.

I do not have the same concern for "campaigns" like post card campaigns or "click and send" e-mail campaigns. It seems to me that while these are important, and commenters should be noted and included for the record, insofar as the comments do not differ in substance, it makes sense to provide one generic response.

Ralph Hutchison, coordinator
submitted for the Oak Ridge Environmental Peace Alliance

Comments herein are in addition to other comments, written and spoken, submitted to DOE/NNSA by individual members of the Oak Ridge Environmental Peace Alliance and are not meant to replace or supplant any such comments.

Huthwaite, Motoko

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PC_655

Levens, Matthew

From: Mhuthwaite@aol.com
Sent: Thursday, February 21, 2008 4:25 PM
To: Complex2030
Cc: dan@lomb.us
Subject: To Mr. Theodore Wyka

Dear Mr. Wyka,
As an "interested party" regarding the Complex Transformation's Supplemental Programmatic Environmental Impact Statement, I appreciate and accept your invitation to offer my personal comments.
I was a teenager in Cambridge, Mass., when Pearl Harbor was attacked and thought, "Those nasty Japanese, how could they do that to us?" I was in Tokyo, repatriated on the exchange ship the Gripsholm, when the atomic bombs were dropped on Hiroshima and Nagasaki and thought, "Those nasty Americans, how could they do that to us?"
It took a few years of growing up to realize I could not always have it my way. However, the years have only strengthened my conviction that war is not the answer and a
1|16A single bomb that could not only wipe out an entire city but continue to kill and cripple generation after generation was an evil that must be stopped.
I applaud the stand taken by George P. Shultz, William J. Perry, Henry A. Kissinger and Sam Nunn in their article "Toward a Nuclear-Free World"
2|20 published on January 15, 2008, in the Wall Street Journal. I endorse Margaret Beckett's support from the United Kingdom that "What we need is both a vision - a scenario for a world free of nuclear weapons - and action - progressive steps to reduce warhead numbers and to limit the role of nuclear weapons in security policy. These two strands are separate but they are mutually reinforcing. Both are necessary, but at the moment too weak."
The Complex Transformation, which will maintain an enduring stockpile and build new bombs in Oak Ridge in a new nuclear weapons complex, flies in the face of the
3|1F Nonproliferaton Treaty we signed. It is headed in the opposite direction from the disarmament and abolition of nuclear armaments the world seeks and needs.
How can we face our children and grandchildren to allow this to happen? How can we face our God?

Sincerely,

Motoko Fujishiro Huthwaite, Ph.D.
527 West Iroquois Road
Pontiac, MI 48341-2024

**********Ideas to please picky eaters. Watch video on AOL Living. (http://living.aol.com/video/how-to-please-your-picky-eater/rachel-campos-duffy/2050827?NCID=aolcmp00300000002598)

1

Hyatt, Walter

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PC_503

Buenaflor, Justin

From: Hyatt, Walter Keith (WKH) [hyattwk@y12.doe.gov]
Sent: Tuesday, February 19, 2008 8:03 AM
To: Complex2030
Subject: SPEIS

Importance: High

To whom it may concern:

I would like to go on record as supporting Y-12's Mission in future years. IF it is funded properly, which recently it has not been, Y-12 can perform its mission in a safe and secure manner. We urgently need new facilities and they need to be capable of supporting future missions fully. Having worked in the old facilities for the last 27 years, I can tell you that they cannot last much longer and there is some doubt that if needed to, that they can support a full mission of work. They have serious infrastructure problems. The old World War II and 1950s era equipment is out of date, breaking constantly, and getting harder to find parts for.

1|15A

I urge immediate action on the completion of the Uranium Processing Facility (UPF) here at Y-12 as outlined in the below alternative:

Distributed Centers of Excellence Alternative (NNSA Preferred Alternative) Retains the three major special nuclear material functions (plutonium, uranium and weapon assembly/disassembly) at two or three sites.
Impact to Y12: Y12 would continue as the Uranium Center of Excellence; the Highly Enriched Uranium Manufacturing Facility would be completed; and preliminary design of the Uranium Processing Facility would proceed.

I also have a stake in this as a native Oak Ridger. We want this type of work to remain here, and hopefully help Oak Ridge return to the prosperity it enjoyed in the 1950s, 60s and 70s. Since 1984, Oak Ridge has been in decline with the closing of K-25 and the deep cuts to Y-12. Loss of DOE in leiu of tax payments has caused property taxes to rise to the 4th highest in the state and caused a loss of residents and businesses to West Knoxville. We need to reverse that trend if we are to survive and hopefully this and spinoff business will help.

Thanks,

Keith Hyatt
9215 EU Side Work Coordinator
576-8681 or 873-4449

1

Hyde, Gregory
Page 1 of 1

PC_623

Buenaflor, Delight

From: Gregory Hyde [greg_hyde@yahoo.com]
Sent: Tuesday, March 25, 2008 12:12 AM
To: DIV.Complex.Transformation
Subject: Form posted from Microsoft Internet Explorer.
Follow Up Flag: Follow up
Flag Status: Red

Last Name=Hyde First Name=Gregory Email Address=greg_hyde@yahoo.com Street Address=1390 Quarton Rd. City=Bloomfield Hills State=MI ZIP Code=48304 Comments=Dear Sirs: I wish to state my catagorical objection to to designing new nuclear bombs and extending the shelf life of our current stockpile. It is time to dismantle them, not to create yet another generation of these absolutely immoral weapons. There is no justification for them. Sincerely yours, Gregory J. Hyde

1|16A

Looking for last minute shopping deals? Find them fast with Yahoo! Search.

Ibboston, David
Page 1 of 1

PC_1320

Levens, Matthew

From: David Ibbotson [helenljo@pacifier.com]
Sent: Tuesday, February 19, 2008 9:24 PM
To: Complex2030
Subject: Proposed CMRR project

David Ibbotson
5631 SE Knight St
Portland, OR 97206-6023

February 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

I live in Portland, Oregon, hundreds of miles from the nearest of the upcoming public hearings on the government's proposed Chemistry and Metallurgy Research replacement project.

1|3A

Not ony does the U.S. have more nuclear weapons than any other nation, its citizens live with the greatest risk of nuclear weapons accidents of any other people in the world.

2| 14M.3

Why then are we contemplating compounding our self imposed threat of self destruction by continuing to expand our nuclear weapons production capabilities instead of working to end the production of all such weapons, here and abroad?

3|1J

I hope you will vote against this proposal to go forward with another nuclear warhead production scheme.

We don't have to do this.

Sincerely,

David Ibbotson
503-246-5791

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Imler, Gail
Page 1 of 1

PC_1981

Levens, Matthew

From: Gail Imler [gailimlermarin@hotmail.com]
Sent: Wednesday, April 30, 2008 12:14 PM
To: Complex2030
Subject: Renewed work on our nuclear arsenal

Gail Imler
850 3/4 Palm Ave. #3
W. Hollywood, CA 90069-4021

April 30, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A 2|1J We should be an example for the rest of the world to emulate. Resuming work on our nuclear arsenal would be completely insane! If we are completely insane that would make us a rogue nation with nuclear capability...oh, that's the way most of the world perceives us already!

Sincerely,

Gail

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Ingrassia, John
Page 1 of 1

PC_1108

Levens, Matthew

From: John F. Ingrassia [johning@hotmail.com]
Sent: Thursday, March 27, 2008 12:40 AM
To: Complex2030
Subject: RE: Nuclear Proliferation ???

Dear Mr. T. Wyka,
The Complex Transformation proposal reflects outdated thinking.

1|16A; 2|1J; 1|16A (cont.) The USA must get back on the track to pursuing a Nuclear weapons-FREE world by adopting a non- proliferation treaty with other countries as proposed by Dr. Helen Caldicott who's written many books on Nuclear energyand is the world's expert on it ! My must use other natural methods to get us weaned off OIL & Nuclear and on to Solar, Wind, Tidal, Hydrogen and all other NON-Toxic forms of Energy !!!

Peace & Understanding, Dr. John F. Ingrassia DPh

1

Inskeep, Michael
Page 1 of 1

PC_2065

Levens, Matthew

From: Michael Inskeep [mike@gentlehelpers.com]
Sent: Wednesday, April 30, 2008 7:43 AM
To: Complex2030
Subject: Oppose Complex Transformation

Dear Mr. Wyka,
I and an overwhelming majority of Americans are in favor of a nuclear-weapon free world.

1|16A
2|1J We need to vigorously push for total and complete verifiable nuclear disarmament. We should not focus our plans for the future on the production of new plutonium warheads.

Michael Inskeep
412 N Wayne Ave
Apt 204
Radnor, PA 19087-3243

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Intrator, Joan
Page 1 of 1

April 21, 2008

PC_934

Theodore Wyka
Complex Transformation SPEIS Document Mgr.
Office of Transformation, NA-10.1
U.S. DOE/NNSA
100 Independence Ave. SW
Washington, DC. 20585

Mr. Wyka:

1|16A

2|1F In my humble opinion, we need a new future, and not a "bombplex." We will only be safe by abrogating all nuclear weapons, not by designing new ones, or re-arranging the ones we already have.

Nobody will survive a nuclear war in one piece. Give up that idea.

Why have we refused to honore the non-proliferation treaty of 1970?

I am utterly opposed to your "complex transformation". We should dismantle the remainder of our nuclear weapons and dispose of their uranium and plutonium.

Joan Intrator

Joan Intrator
3863 25th St.
San Francisco, CA 94114

Ivens, John
Page 1 of 1

PC_1080

Levens, Matthew

From: Ivens, John [John.Ivens@ashford.edu]
Sent: Thursday, March 27, 2008 4:46 PM
To: Complex2030
Subject: Say "No!" to complex tranformation.

1|16A
2|1F
Building the next generation of nuclear weapons factories takes the United States in the opposite direction of multilateral global disarmament.

3|1J
The new plan also threatens U.S. and international security by undermining calls for Iran and North Korea to halt their nuclear programs.

4|10B
Instead of building yet another weapons installation at Los Alamos, let's restore that site to the peaceful grandeur that it had when it was first inhabited by the Anasazi

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Jaber, David
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PC_439

Buenaflor, Justin

From: David Jaber [djaber@california.com]
Sent: Thursday, February 21, 2008 1:12 AM
To: Complex2030
Subject: CMRR: No New Nuclear Weapons

David Jaber
1630 Josephine St., Apt. D
Berkeley, CA 94703-1343

February 21, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A
2|10B
I urge you to oppose the administration's proposal (Chemistry and Metallurgy Research Replacement (CMRR) project) to build a plant to produce plutonium pits for nuclear weapons.

3|1J
While the U.S. asks other countries to forego developing nuclear arsenals, we are truly hypocritical in simultaneously trying to increase our own nuclear weapon capacity, and become the primary actor in undermining world peace.

Please do not embark on this path. We must keep our integrity as a nation

Sincerely,

David Jaber

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Jackim, Penny

Page 1 of 1

PC_1187

Levens, Matthew

From: Penny Jackim [ahimsa@earthlink.net]
Sent: Saturday, March 29, 2008 10:23AM
To: Complex2030
Subject: No New Nuclear Weapons

Penny Jackim
8A Laneway Ct.
Narragansett, RI 02882-1241

March 29, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A NO NEW NUCLEAR WEAPONS
NO NEW NUCLEAR WEAPONS
NO NEW NUCLEAR WEAPONS
NO NEW NUCLEAR WEAPONS
NO NEW NUCLEAR WEAPONS
NO NEW NUCLEAR WEAPONS
NO NEW NUCLEAR WEAPONS
NO NEW NUCLEAR WEAPONS

This is the WRONG direction!

2|9B Lets spend money to help contain the U.S. debt and to fund human needs, not destruction!

Let's get smart for a change!

Sincerely,

Penny Jackim
401-783-1972

Jackson, Karen

Page 1 of 1

PC_571

Levens, Matthew

From: Karen Jackson, LCSW [klottalegs@aol.com]
Sent: Wednesday, February 27, 2008 1:25 PM
To: Complex2030
Subject: Please help!!!

Karen Jackson, LCSW
1105 Terminal Way, Ste 202
Reno, NV 89502-2162

February 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

2|1J I am also opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal.

Pleae do something to help our country and its status in the world...not harm it further!!!!

Sincerely,

Karen Jackson, LCSW
7757861179

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Jackson-Holt, Jo
Page 1 of 1

PC_539

Buenaflor, Justin

From: Jo Ann Jackson-Holt [jolena1951@yahoo.com]
Sent: Saturday, March 15, 2008 8:09 PM
To: Complex2030
Subject: New Nuclear Weapons

Jo Ann Jackson-Holt
4987 Hillridge Way
Fair Oaks, CA 95628-4244

March 15, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

2|14O Plutonium lasts for thousands of years and can leach into the ground water. Our future is at stake. Our children's and grandchildren's future is at stake. Let us not forget our legacies to them. The Earth is the only place we have to live.

Sincerely,

Ms. Jo Ann Jackson-Holt

1

Jacobs, Mark
Page 1 of 1

PC_1645

Levens, Matthew

From: mark_gina@mac.com
Sent: Saturday, April 05, 2008 11:23 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|2O Who would Jesus bomb?

Sincerely,
Mark Jacobs
116 W. Second Street
Rock Falls, IL 61071

cc:
Senator Dick Durbin
Senator Barack Obama
Representative Phil Hare

1

Jahn, Lawrence

Page 1 of 1

PC_1639

Levens, Matthew

From: ljcool43@hotmail.com
Sent: Saturday, April 05, 2008 8:09 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|2O; 2|9B Somewhat analogous to the need to perpetuate a law enforcement empire at the end of Prohibition, we now have the resistence to dismantling the nuclear arsenal. It's time to retire the bulk of the thermonuclear arsenal (aside from a minimal deterrent against rogue states) muti-laterally. Instead, let us pour these same resources into the development of fusion power, a viable reality given a few decades of more intensive research. From a former engineering physics student and serious amateur astronomer.

Sincerely,
Lawrence Jahn
P.O. Box 2613
Naperville, IL 60567

cc:
Senator Dick Durbin
Representative Judy Biggert
Senator Barack Obama

1

Jarvinen, Laura

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PC_592

Levens, Matthew

From: Laura Jarvinen [lejarvinen@gmail.com]
Sent: Sunday, March 23, 2008 9:21 PM
To: Complex2030
Subject: I support the preferred alternative- restructure SNM Facilities

1|15A 2|7N 3|10B This email demonstrates my support of NNSA's preferred alternative for restructureing SNM facilities, pursuing distributed centers of excellence, with Los Alamos providing the Pu manufacturing and R&D . Thank you for your consideration.

5/14/2008

Jefferies, William
Page 1 of 1

PC_1258

Levens, Matthew

From: William M. Jeffries [billjumc@hotmail.com]
Sent: Thursday, March 27, 2008 10:40 PM
To: ComplexZ030
Subject: New N bomb plant and other upgrades

William M. Jeffries
3619 Sunningdale Way
Durham, NC 27707-5654

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

Dear DOE Officials:

1|16A It is imperative that we not build new facilities or other enhancements for future nuclear bomb/warhead manufacture.

2|1F Our nation is a solemn signatory to anti-proliferation treaty obligations that we must not regard, as Hitler did, as "mere scraps of paper."

If we did not already have such treaty commitments in place, then our national security would require that we urgently conclude such treaties.

Sincerely,

William M. Jeffries, Sr.
9194020424

Jeffreys, Pamela
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02-06-2008 20:07 PAGE1

Pamela Jeffreys
PO Box 193,
Arroyo Seco, NM 87514
Aril 23, 2008

PC_942

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
US Dept. of Energy/ NNSA
1000 Independence Ave, SW
Washington, DC 20585

Dear Mr. Wyka,

1|16A I am writing to add my voice to the others that are calling for a HALT to the PLANNED EXPANDED PLUTONIUM PIT PRODUCTION at Los Alamos.

I BASE MY POSITION ON THE FOLLOWING:

2|5C.1 1. The fact of existing and reusable pits: Spokesmen for the Pantex Plant states that pit "reuse" is far less expensive and environmentally damaging than new pit production. This plant is authorized to reuse up to 350 pits per year. The Pantex Plan stores at least 12,000 pits today.

3|7J 2. Los Alamos is not acquiring the needed funds for cleanup. LANL must meet its commitment to the people of New Mexico and effectively address its 60-year legacy of pollution here. Until that needed funding and implementation is secured and actualized, it is irresponsible to be planning an increased production of plutonium pits.

4|1C 3. NNSA's "transformation" proposal should be withdrawn until there is a new Nuclear Posture Review. The House Armed Services Committee stated, after President Bush's NPR "there is an urgent need for a debate over the role of nuclear weapons in US strategic posture". There is a law that requires a bi-partisan commission to recommend BY THIS COMING DECEMBER the number of weapons really needed as well as the size and make-up of the nuclear weapons complex. IT IS ILLOGICAL AND AGAINST THE WILL OF THE AMERICAN PEOPLE AND THIS GREATER PURPOSE to go ahead with the complex transformation at this time.

5|9B 4. NEW MEXICO AND LANL ARE IDEAL SITES FOR MISSION DIVERSIFICATION, MOST NOTABLY FOR RESEARCH AND ACTUALIZATION OF SOLAR AND WIND TECHNOLOGIES – CRUCIAL FOR ADDRESSING OIL DEPENDENCY ISSUES AND THEREFORE CRITICAL FOR NATIONAL SECURITY.

Sincerely,

Pamela Jeffreys

Jobe, Johnny
Page 1 of 2

PC_544

Buenaflor, Justin

From: Jobe, Johnny Wayne (JIP) [jobejw@y12.doe.gov]
Sent: Monday, March 03, 2008 8:39 AM
To: Complex2030
Subject: FW: Y-12 Complex Transformation

From: Jobe, Johnny Wayne (JIP)
Sent: Wednesday, February 27, 2008 1:28 PM
To: Jobe, Johnny Wayne (JIP)
Subject: Y-12 Complex Transformation

Mr. Ted Wyka ,

My name is Wayne Jobe, I am a Carpenter by trade. I have worked at the three plant sites for the better part of 26 years. I belong to Carpenters local no. 50 which is one of the 16 international, and 17 local unions that make up the Atomic Trades and Labor Council. We have been stewards for the Nations Nuclear materials, since the Manhattan Project , for more than 60 years, we have worked together in the name of National security. When I say we, I'm talking about Labor - Management, the Labor side of the house, and the Management side of the house, You see, it takes both sides working together to accomplish the jobs, goals, and requirements set by NNSA, DOE, DOD, and Congress to move forward safely, and in a timely manner, as we have done at the Y-12 National Security Complex.

1|15A We have stepped up to the plate and accepted every challenge. That's just the kind of people we are. We have some of the best craftsmen in the country working here at the Y-12 National Security Complex. When we work together as a team, (Labor- Management) There is always a positive solution. We are continually looking for ways to save tax payers money and cut cost, which we have recently did in the way of decommissioning, and demolition, of several hundred thousand square feet of buildings, that program by the way is scheduled to take several more buildings down this year, and in the years to come, equating to even more cost savings. I must add that the Y-12 National Security Complex was out front on decommissioning and demolition and continues to shine in that Area..

We are very passionate about our work. We ask for Local, State, and Federal help to keep our work at Y-12, and bring future work, such as a Uranium Processing Facility, and a Plutonium Pit Facility to Y-12. We

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Jobe, Johnny
Page 2 of 2

PC_544

have the resources, technology, and manpower to do the work. We just ask for the opportunity. What happens at Y-12, stays at Y-12, have you herd that phrase? Well let me tell you another one. What happens at Y-12 affects people who never step foot on the site. The local economy depends on jobs at Y-12, Local Merchants, mom and pop shops, our school systems, health care, the list goes on and on. Closing Y-12 or sending the work to another site would devastate the local economy. I urge NNSA, DOE and Congress to act on the behalf of our communities and the Y-12 National Security Complex. Say yes to continue enriched uranium operations, upgrade existing enriched uranium facilities, and build a new Plutonium Pit Facility (125 pits/year) at the Y-12 National Security Complex. We have a history of meeting DOD requirements and National Security needs.

Sincerely,

Wayne Jobe

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2

Joe, Tony
Page 1 of 1

THE NAVAJO NATION

PC_227

JOE SHIRLEY, JR.
PRESIDENT

BEN SHELLY
VICE-PRESIDENT

March 05, 2008

Mr. Theodore A. Wyka, Document Manager
Department of Energy
National Security Administration
Washington, D.C. 20585

Subject: Tribal Consultation Request. Proposing to continue transformation of the nation's nuclear weapons complex to one smaller, more efficient, more secure, and better able to respond to changes in national security requirements.

Dear Mr. Wyka:

Our apology for an oversight and missing the deadline date of our response to your request, please note that in reference to your letter of December 21, 2007, the Historic Preservation Department – Traditional Culture Program (HPD-TCP) received a request for consultation regarding the above undertaking and/or project. After reviewing your consultation documents, HPD-TCP has concluded the proposed undertaking/project area **will not impact** any Navajo traditional cultural properties or historical properties. 1|14H

However, if there are any inadvertent discoveries made during the course of the undertaking; your agency shall cease all operations within the project area. HPD-TCP shall be notified by telephone within 24 hours and a formal letter be sent within 72 hours. All work shall be suspended until mitigation measures/procedures have been developed in consultation with the Navajo Nation.

The HPD-TCP appreciates your agency's consultation efforts, pursuant to 36 CFR Pt. 800.1 (c)(2)(iii). Should you have additional concerns and/or questions, do not hesitate to contact me. My contact information is listed below.

Sincerely,

Mr. Tony Joe, Program Manager
Historic Preservation Department – Traditional Culture Program

Tel: 928.871.7688 Fax: 928.871.7886 E-mail: tonyjoe@navajo.org

TCP 08-423
File: Office file/chrono

HISTORIC PRESERVATION DEPARTMENT P.O. BOX 4950 WINDOW ROCK, ARIZONA 86515 928.871.7198 (v) 928.871.7886 (fax)

Johnson, Kryscynthia
Page 1 of 1

January 14,2008

Bak Middle School of the Arts
1725 Echo Lake Drive
West Palm Beach, FL 33407

PC_949

National Nuclear Security Administration
1000 Independence Ave., SW
Washington D.C 20585

Dear National Nuclear Security Administration,

My name is Kryscynthia Johnson, I am a 7th grade student from Ms. Dooles Civics class of Bak Middle School of the Arts in Florida. I am writing to you because I want you to stop making Nuclear Weapons. I understand that you are trying to make them safe, but that does not excuse the fact that they murder millions of innocent people, they are destroying earth, and too many places are using them. I'm not asking for peace because I know that won't happen, I'm just asking for you to stop making Nuclear Weapons. Please continue to read with an open-mind. 1|16A 2|14O

********** **The Facts** **********

In a part of an article from The Hamilton Spectator (a newspaper) called "An appeal for Nuclear Abolition", it states that " the "Nuclear Weapons free world" promise that U.S and Soviet Union ignored and if it is ignored again, the world might end up worse than it ended with the Cold War.". This Article supports my say because it proves that there are so many problems a nuclear weapon can lead up to, and it also destroys so many people, everything could end up extinct. Another supporter is a book page from "The World Almanac and Book of Facts 2007" called "Nuclear Powers of the World". This book page talks about all the places in the world that have Nuclear Weapons. The places are Britain, France, China, India, Pakistan, Russia, North Korea, Israel, South Africa, Argentina, Brazil, Kazakhstan, Ukraine, and the United States. I don't think these places know about how many of them use Nuclear Weapons and that is why a lot of them don't care. If all these places use their weapons, then we definitely won't be lasting as long as we think. Radio-Chemicals can also damage people and the chemicals can get passed to their children.

Johnson, Mack

Page 1 of 1

PC_2048

Levens, Matthew

From: Physicians for Social Responsibility [webmaster@psr.org] on behalf of Mack Johnson [mjohnson@nmsd.wednet.edu]
Sent: Thursday, April 10, 2008 10:30 PM
To: Complex2030
Subject: New nuclear weaponsare unhealthy and cause proliferation

Apr 10, 2008

Mr. Theodore Wyka
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Wyka,

I have the following comments on the Draft Complex Transformation PEIS (DOE/EIS-0236-S4).

The proposed Complex Transformation program endangers the environment and human health. Since the Manhattan Project began, hundreds of thousands of nuclear weapons workers have been exposed to ionizing

radiation. In 2000, the U.S. Government admitted that workers had been

1|14K 2|1Q; 3|7J; harmed by activities at Department of Energy and other facilities, and those deemed injured were to be offered financial and other compensation. It is important that several actions be taken before the DOE makes a decision to move forward with its preferred alternative. 1. A human health risk assessment of proposed nuclear weapons production activities, future nuclear weapons testing, environmental clean up of the legacy nuclear weapons production complex, and the future use of nuclear weapons should be conducted, 2. The future role of nuclear weapons policy in the U.S. must be

4|1C clear. A full and thorough nuclear posture review should be completed prior to any final decisions about complex transformation.

1|14K (cont.) 3. The Department of Energy should compile and disseminate the results of epidemiologic studies of radiation health of workers and communities, updating its Comprehensive Epidemiologic Data Resource program of the early 1990s. 4. The Department of Energy should include an alternative analysis

5|7A that would focus instead on the clean up tasks necessary to respond to the significant environmental and public health harms caused by Cold War nuclear weapons production activities. Thank you for your time in considering these concerns and comments.

Sincerely,

Mr. Mack Johnson
15455 Olympic View Loop Rd NW
Silverdale, WA 98383-9720

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Johnson, Shirley

Page 1 of 1

PC_1857

Levens, Matthew

From: Shirley Johnson [goldenpond903@yahoo.com]
Sent: Friday, March 28, 2008 4:24 PM
To: Complex2030
Subject: Nuclear Plant

Shirley Johnson
849 orchard ave
West Chester, PA 19382-4858

March 28, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|1J Building this new plant would send a contradictory message to other countries, such as Iran, who may be seeking nuclear weapons. While the U.S. is asking others to forego developing nuclear arsenals, we are simultaneously trying to increase our own capacity to build new nuclear weapons.

How can we achieve peace in this world if we continue to build nuclear facilities?

2|13A.1 We live in an area where there is a nuclear power plant and I worry about an accident or terrorism there.

Sincerely,

Shirley Johnson

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Johnson, William
Page 1 of 1

PC_189

William Earl Johnson
841 New Hope Road
Rockwood, TN 37854

I am the Vice President of the Atomic Trades and Labor Council. The organization which represents 1400 employees at Y-12 National Security Complex.

1|15A
2|10I
I am here today to say that the men and women of the Atomic Trades and Labor Council support the National Nuclear Security Administration's plan for transformation of the nuclear weapons complex—specifically the Distributed Centers of Excellence Alternative (NNSA's preferred alternative)—that would allow Y-12 to continue as the Uranium Center of Excellence; finish the Highly Enriched Uranium Manufacturing Facility and build the Uranium Processing Facility.

1|15A(cont)
3|5C

2|10I (cont)
Y-12 has been successfully carrying out critical national security missions for nearly 65 years. A key to that success has been and continues to be the strength of its skilled workforce. Because of their levels of training, the bargaining unit employees are uniquely suited to the types of work performed at Y-12.

1|15A (cont)

4|7N
Again, let me say that the ATLC supports NNSA's preferred alternative for Complex Transformation and looks forward to working together with B&W Y-12 and the NNSA to make this transformation a reality

Johnston, Mary
Page 1 of 1

PC_1467

Levens, Matthew

From: Mary M. Johnston [marymjohnston@hotmail.com]
Sent: Thursday, May 01, 2008 12:00 AM
To: Complex2030
Subject: Nuclear Weapons

Mr. Ted Wyka,

It is a sad and tragic day when citizens of the United States must implore the Department of Energy to end its planning for, and construction of, weapons of mass destruction. The DOE is embarked on a devastating and irreversible course of action that will impact the entire Earth.

Now as never before the human race stands on the brink of extinction brought on by the hubris and cruel insensitivity of arms makers and their enablers. The dark shadow of ultimate earthly destruction hovers over the Y-12 nuclear weapons plant in Oak Ridge, Tennessee. This place will be marked forever as one of the central locations for the production of the means for the end of all life as we know it.

No rational mind can encompass the nefarious result of a project meant to secure nuclear dominance for the United States in perpetuity. The timeframe for this projected weapons refurbishment program is meaningless. It assumes that life will exist beyond the present contemplated use of these mad weapons. This love affair with weapons beginning in the distant past of human history will reach its final culmination in the days to come.

As we go about our daily lives plans are in place and projects looming that will permanently shatter our pursuits on this Earth. All of our hopes and plans are held hostage by those who find supreme comfort in their mastery and control of the most
16A horrific weapons ever conceived. It is a flawed and deadly dream. In its wake will come a nightmare beyond human contemplation.

The bookshelves of technical data regarding this project will continue to be voluminous. The scientific knowledge brought to bear will be impressive. The hearings will be duly recorded and statements taken. Unfortunately, buried in the ongoing gathering of information is the ultimate reality. The demon that dares not speak its name is the ultimate and certain death of the human race.

As this looming monstrosity unfolds let the record show that we the people of the Earth object to this damnation. And may our voices join the chorus of voices everywhere that call for the complete and total end to nuclear bomb making. It must be the first step in the elimination of all the weapons stock piles of all nations.

The production of death dealing technologies must be stopped. The return to sanity must begin. Those who conceived of and carry out plans for mass destruction must be called to account. They must not be permitted to hold the world hostage to their schemes and plans. We must not and will not tolerate a world saturated with fear and uncertainty.

Your deliberations today can and will determine the fate of the Earth. It is an incomparable responsibility. May you be granted the wisdom to choose the path of peace and disarmament. The promise of a new day dawning can only come when we close the door to violence as foreign policyThe alternative can only be the end of all life in a nuclear flash.

Mary M. Johnston
25311 Harcourt
Farmington Hills, MI
48336-1225
248-477-1670

1

Jones, Betty
Page 1 of 1

PC-14

Betty L. Jones
P.O. Box 6929
Oak Ridge, Tenn. 37831
March 4, 2008

Mr. Wyka:

1|15A 2|10I 3|7N 4|5C

I work at the Y-12 National Security Complex. I have been employed here for 28 years. The Y-12 facility has done a fine job at Oak Ridge for the last 65 years. I support the NNSA in making Y-12 the Uranium Center of Excellence. We need a nuclear deterrent capability here at Y-12. The plant contributes to 87 % of the economy in Tennessee. We have excellent Company and union relations at Y-12. This I have seen first hand, as being part of the hourly structure in my early career at the plant and now part of the salary structure. We have a highly trained workforce and an excellent safety record. Our complex ensures security for all Americans. The ATLC is prepared to handle any task that the NNSA need to meet their goals. Y-12 has improved the quality of life for me and my family. Through the educational benefits here at Y-12, I was able to go to college at night and earn my Bachelors Degree enabling me to obtain a better job within the company. I hope you will consider making Y-12 the Distributed Center of Excellence.

Sincerely,
Betty L. Jones
Betty L. Jones

Jones, Erika
Page 1 of 1

PC_1976

Levens, Matthew

From: Erika Jones [erikajonessparks@mac.com]
Sent: Wednesday, April 30, 2008 5:26 PM
To: Complex2030
Subject: Public comment re: Private for profit company running nuclear weapons complex

1|10B I am concerned that a private, for profit company, LANS, is managing LANL, which will become the nation's ONLY nuclear production facility if this complex transformation takes place. That is very high risk.

2|11A I recommend a study be done of the risks of having a private, for profit corporation in control of ALL the nation's nuclear weapons research and production. What are the risk scenarios?

1|10B (cont) When LANL and Sandia National Laboratory were established, the wise view of President Eisenhower and other leaders was that it was dangerous for the Nation's nuclear weapons to be managed by either the military (think of the movie Dr. Strangelove) or private industry (think of the amazing profit potential of a monopoly!). Their concerns were right on target. That's why LANL and other DOE labs have historically been managed by universities. Sandia, which is very well managed, is a not for profit corporation. That's much different than a for profit corporation.

3|2H Lack of disclosure and accountability is another danger in addition to the above. LANS has refused to disclose information that taxpayers have a right to know. For example, LANS has refused to disclose salaries of it's executives, saying that is privileged information since it is a private, for profit company. The public taxpayers who pay their salaries have a right to know this information, especially since LANS executives may be making 3-6 times
the salaries of Directors and executives at other DOE facilities.
Who is accountable for outrageous salaries the taxpayers are funding?
What other information will LANS fail to disclose?

4|9H Putting a private, for profit corporation in control of ALL the nation's nuclear weapons research and production is not only dangerous, but represents poor, unaccountable stewardship of taxpayers' money.

Erika Jones

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This email may be confidential, may be legally privileged, and is for the intended recipient only.
Unauthorized access, disclosure, copying, distribution, or reliance on any of it by anyone else is prohibited and may be a criminal offense.
Please delete if obtained in error and email confirmation to the sender.

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Jones, Mary
Page 1 of 1

PC_1812

Levens, Matthew

From: Mary Robbins Jones [robbins@airmail.net]
Sent: Friday, March 28, 2008 10:57 PM
To: Complex2030
Subject: Stop new nukes

Mary Robbins Jones
1208 Berkeley
Richardson, TX 75081-5933

March 28, 2008

Complex Transformation

Dear Complex Transformation:

1|1K I am opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal.

2|9B We should spend the billions proposed for this plan on programs to actually benefit the people of the United States, to educate and feed our children, and provide medical care and job retraining for our citizens as well as to eliminate nucleaer weapons.

Sincerely,

Mary Robbins Jones
972 690 5845

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Jones, Virginia
Page 1 of 2

PC_133

A Statement for the Public Hearing on the Environmental Impact Statement
For the Stockpile Life Extension Program at Y-12 and Complex Transformation

Oak Ridge, Tennessee
February 26, 2008

1|16A; 2|9B Oak Ridge is in a situation similar to the tobacco industry which keeps manufacturing instruments of destruction because it wants "to earn a living." Growers of tobacco are learning that they can grow other crops which aren't deadly like tobacco. Perhaps the United States, with the help of Oak Ridge, can learn to "earn a living" by establishing a new Manhattan Project - to solve the problem of the pollution of the earth, which threatens the planet's very existence.

3|10I It makes little sense to stockpile weapons of mass destruction, and to possibly develop new weapons, and ignore the threat to the life of the earth itself. The money proposed to extend the life of enough nuclear weapons to destroy the earth, and to possibly develop new weapons, should instead be used for defending the planet. Oak Ridge is a logical place for this effort to defend life on earth.

1|16A(cont.) Oak Ridge can be a leader in this new Defense endeavor. The United States and all other countries on the globe are in a race with time for the very survival of life on earth. Stockpiling weapons makes no sense at all. The common enemy is the pollution of the planet.

4|14M.3
1|16A (cont.) The impact of no further storage or development of nuclear weapons in Oak Ridge would be a reduction of hazardous materials in the city and an improvement in its public image. The future economic benefit to Oak Ridge would be great.

Virginia M. Jones
969 Oak Ridge Turnpike, No. 358
Oak Ridge, TN 37830
865-483-8944

February 26, 2008

Jones, Virginia
Page 2 of 2

Citizens for Peaceful Solutions

PEACE

Understanding, Discussion, Friendship, Diplomacy
Mediation, Reconciliation, Respect, Good-Will
For information, or to join this Oak Ridge Group
www.peace-solutions.com 865-483-8944

Jordan, Candace
Page 1 of 1

PC_327

March 27, 08

Ted Wyka, NA-101
U.S. Dept. of Energy
Complex Transformation Comment
1000 Independence Ave. SW
Washington D.C. 20585

Please attend to my comment:

1|1F; 2|16A Instead of revitalizing the nuclear weapons complex and building new bomb plants, the U.S. should **fully** comply with the Non-Proliferation Treaty and **honor** our disarmament obligations. I strongly **oppose** the Dept. of Energy's "Complex Transformation" plan.

Thank you,

Candace Jordan
5150 410th St.
Menomonie, WI 54751

Jordan, Pat
Page 1 of 1

campaign 11

PC_1489

Levens, Matthew

From: pat jordan [loopykatt@hotmail.com]
Sent: Sunday, April 13, 2008 9:06 PM
To: Complex2030
Subject: Reject "Complex Transformation" plan to build nuclear weapons

pat jordan
5147 irvington
los angeles, CA 90042

April 13, 2008

Theodore A Wyka
Complex 2030 SEIS Document Manager
Office of Transformation, U.S. Department of Energy, NA–10.1 1000 Independence Avenue, SW.
Washington, DC 20585

Dear Theodore Wyka:

1|16A The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal.

2|1F; 3|1J; 4|9B I Think that we need to disarm all of our nuke capabilities the fact that we continue to proliferate weapons is a sign to the world that we intend to continue the bloody imperialist campaigns that have been highlighted in such campaigns as the iraq war. illeagal contra opperations and support for corupt regeims in southeast asia please listen to the voices of the people we do not want these wars carried out in our name and we do not wish to continue to pay for the slaughter of innocents with our taxs that could be used to help victims of katrina increased spending in social programs to support education and end the racism indemic in the urban enviroments here in america..

3|1J (cont.) By building up its nuclear arsenal right now, the US is essentially telling the world, "Do as I say, not as I do." Investing in a project of this magnitude implies that the US will be relying on nuclear weapons as an integral part of its security strategy for decades to come. I support a 90 day extension of the public comment period to give Americans time to

5|2.E.1 weigh in on this dangerous proposal.

Sincerely,

pat jordan
213 706 3025

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Jorgensen, John
Page 1 of 1

PC_1656

Levens, Matthew

From: mrjsqrd7@hotmail.com
Sent: Saturday, April 05, 2008 11:25 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|16A 2|9B I think the DOE needs to get out of the nuclear war business and turn its attention to the real national security issue:
Sustainable, carbon-free energy for the future.

3|3A Complex Transformation puts far too much emphasis on re-creating the unnecessary capability to research, develop, and manufacture new types of nuclear weapons. The United States still maintains thousands of nuclear weapons and has thousands more in storage -- more than enough to wipe out civilization tens of times over.
We simply do not need the capability to make more or newer nuclear weapons.

4|1J In addition, Complex Transformation undermines U.S. efforts to stop the spread of nuclear weapons around the world. It violates the spirit and letter of the Comprehensive Test Ban Treaty and sends the wrong message to the world --that obtaining nuclear weapons will increase security.

5|1C Any major upgrade of the nuclear weapons complex must be preceded by a comprehensive analysis and re-evaluation of the role of nuclear weapons as an instrument of security policy.
That review needs to be done by the president and the Department of Defense, not the DOE, and Congress has already mandated that the next president undertake one.

1|16A (cont) Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE should focus on shrinking the still-oversized nuclear weapons complex and on maintaining the safety and security of our existing weapons arsenal as the size of our nuclear stockpile is reduced- to ZERO preferably.

I ask that you include my comment as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project.
Thank you.

Sincerely,
John Jorgensen
6890 E Sunrise Dr
Ste 120 PMB 168
Tucson, AZ 85750

cc:
Senator John McCain
Senator Jon Kyl
Representative Gabrielle Giffords

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Juday, Karen
Page 1 of 1

PC_572

Levens, Matthew

From: Karen Juday [karen.juday@cmich.edu]
Sent: Thursday, January 17, 2008 8:09 AM
To: Complex2030
Subject: Citizen Comment regarding SPEIS, Complex Transformation

Mr. Wyka:
The Department of Energy should be putting their resources into nuclear cleanup and "green" energy research, not expanding their weapons program.

1|9B It is a simple universal law that we attract more of what we create, so let's create some peace, and clean up the environment. Let's use the awesome resources of this great country to become a world leader in peace and global responsibility.

NO MORE NUKES!

Karen Juday
11610 Red Feather Lane
Canadian Lakes, MI 49346

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Kaften, Charles
Page 1 of 1

PC_1938

Levens, Matthew

From: Charles Kaften [CKaften@afsc.org]
Sent: Saturday, April 19, 2008 12:20 PM
To: Complex2030
Subject: A world without nukes

Dear Sir/Madam,

1|16A Nuclear weapons are inherently evil and must be eliminated from the face of the earth.
2|9H Moreover, the present plan of the US government to spend billions to "modernize" the
3|1J nuclear arsenal is repugnant. It is time that the US live up to its ideals, not continue its role as imperial gendarme. I implore you to consider taking a bold step to bring lasting peace to this troubled world and save humanity from self-extinction.

4|1F Imagine a world where the President of the US calls an international conference to plan for the elimination of all nuclear weapons within 5 years. The Nuclear Non-Proliferation Treaty would actually be realized instead of being a mere piece of paper which is used by the nuclear powers to maintain their hegemonic control of nuclear weapons. At that moment, the world would be able to rejoice.

Imagine....

Charlie Kaften

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Kahn, Henry
Page 1 of 1

PC_897

Levens, Matthew

From: Henry Kahn [hkahn@emory.edu
Sent: Saturday, March 29, 2008 7:17 PM
To: Complex2030
Subject: No more nuclear weapons, please

Henry Kahn
947 Blue Ridge Ave
ATLANTA, GA 30306-4416

March 29, 2008

Complex Transformation

Dear Complex Transformation:

1|16A I am opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal.

2|9B We should spend the billions proposed for this plan on programs to eliminate nuclear weapons.

3|1J It would be reckless and immoral to return to an international arms race --- worst of all a NUCLEAR-WEAPON arms race. If the US appears to be doing so, we will destroy all previous steps toward nuclear disarmament.

Sincerely,

Henry S. Kahn, MD
404-872-0166

Kahn, Michaela
Page 1 of 1

PC_1160

Levens, Matthew

From: Michaela Kahn [michaelawolf@juno.com]
Sent: Thursday, March 27, 2008 3:06 PM
To: Complex2030
Subject: No New Nukes

Michaela Kahn
5525 Ashworth Rd
West Des Moines, IA 50266-7101

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons or to modify existing facilities for a gear up toward a new nuclear arsenal.

The destructive power of nuclear weapons and their legacy of poison and terror are well-known. It seems not only like a mistake, but plain stupidity, to walk down this path again.

2|13A.1 Mutually assured destruction is no hope, no insurance, for the future. The proliferation of nuclear devices even plays into the hands of the new world order: terrorists and armies for hire would certainly rejoice at having a larger stockpile of weapons to choose from. And what terrorist cell will really be deterred by threat of nuclear devastation?

3|8A Congress rebuked the Energy Department's last attempts to upgrade the arsenal by de-funding the Reliable Replacement Warhead and last year's proposed mega-scale bomb plant. The CMRR project is another irresponsible new program that should be rejected.

Sincerely,

Michaela Kahn

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Kaimann, Gerald
Page 1 of 1

PC_474

Buenaflor, Justin

From: Fr. Jerry Kaimann [jkai@mcmsys.com]
Sent: Friday, February 15, 2008 2:48 PM
To: Complex2030
Subject: Complex Transformation SPEIS Document

1|16A; 2|1J

As a leader in the world we have to take the risk to get rid of our nuclear weapons rather than refurbish old ones and build new ones. It is a risk. But we have to believe that the leaders of other countries are educated people. We have to trust that they know that they can't control the world just as we can't control the world even though we have nuclear weapons. One or another country may try, but they are doomed to failure just as we are if we try to control the world by our power over them. That is one of the big reasons why we have terrorism today. It is a way of fighting back when someone else has the power. The only way that terrorism will ever go away is if we can sit down with other nations/peoples and work out an agreement that is acceptable to both sides.
It seems ludicrous to me to have, refurbish and build new nuclear weapons and then say to other nations, "You can't have them." If I was the head of another nation I would laugh at you.
We being the only superpower is one of the biggest problems for us to deal with. "Absolute power corrupts absolutely." The only way we can truly negotiate with other nations is if we are on a level with them and not weild power over them. If we were them we sure wouldn't like it and think that we were getting a fair deal.
To refurbish and build new neclear weapons won't solve anything and will only condemn our grandchildren, great grandchildren, etc. to live under the threat of nuclear holocaust.
Gerald Kaimann,
409 S. Kansas Ave.
Marceline, MO 64658

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Kaminski, Cindy
Page 1 of 1

PC_2024

Levens, Matthew

From: Kaminski, Don [DKaminski@hrblock.com]
Sent: Thursday, April 10, 2008 2:07 AM
To: Complex2030
Subject: Comment re: NNSA Complex Transformation

Dear Ted Wyka,

1|16A I am again voicing my concern on behalf of the Town of Tonopah regarding the possible relocation of the NNSA flight test operations.

2|2H 3|6C NNSA commissioned an Independent Business Case Analysis of Complex Transformation Flight Test Facilities (IBCA of CTFTT) study that has not been included in the Complex Transformation draft. The information contained in the IBCA of CTFTT study states that the move of operations from the Tonopah Test Range (TTR) would be a mistake. The most favorable alternative would be to upgrade TTR. This statement is in the Executive Summary of the study on page iv last paragraph. Why is this costly study being ignored? I had been informed that this independent study had been commissioned by the NNSA but when I requested a copy, no one was able to locate it or even admit the study existed.

1|16A (cont) Commissioner Eastley from Nye County Board of Commissioners (NCBoC) testified in Washington DC on March 25, 2008 and I agree with her remarks 100%.

4|10E 3|6C (cont) The Town of Tonopah is again being used as a political football and this is the thanks that we get for supporting DoD, DoE, and the other contractors and users from around the world. We are a very small community that has done its patriotic duty by keeping "mum" regarding the missions at TTR. The skill of the employees at TTR cannot be matched at White Sands Missile Range (WSMR). DoD and DoE operations are not alike and yes, there is a difference in costs but is NNSA willing to risk national security to "save a few bucks"! The money spent on the studies, public scoping meetings, travel, postage, etc could have already upgraded TTR and continued operations.

5|18B 6|18C 7|14I The Town of Tonopah is suffering the effects of the proposed relocation as employees are quitting to secure new jobs elsewhere. Many local businesses are owned by a spouse of a TTR employees and the loss of local businesses will be another blow to our small community. Plus there will be a ripple effect to the other communities who rely on Tonopah for goods and services. Our service organizations will lose many volunteers as will our volunteer fire department, search and rescue teams and EMT's.

4|10E (cont) I stress that you reread your IBCA of CTFTF report and upgrade TTR.

Thank you.

Cindy Kaminski
Chairman of the Tonopah Town Board
Tonopah Nevada
775 482- 6336

775 482-6181

1

Karpen, Leah
Page 1 of 2

PC_1

LEAH R. KARPEN - 400 CHARLOTTE STRET #803 - ASHEVILLE, NC 28801-1452\\

February 28, 2008

Mr. Theodore Wyka
Complex Trransformation SPEIS Document Manager
Office of Transformation, NA-10.1
US Department of Energy/NNSA
1000 Independende Avenue S. W.
Washington, DC 20585

Dear M:r. Wyka

DRAFT COMPLEX TRANSFORMATION SPEIS COMMENTS

1|2J I have received your cover letter of December 21, 2007, and the accompanying CD with complete information. At the outset I must state that the information presented is so complex that one can hardly deal with all the details.

2|11A 3|11E 4|1Q The full envirnomental impact of the proposed Complex Transformation program requires wide expert input and public participation. In particular, new studies are needed on the medical, public health and climate impacts of the life cycle of the proposal, including prospective testing and use of the nuclear weapons it will produce.

3|11E (cont) Specifically, Professors O.B. Toom of the University of Colorado at Boulder and Alan Robcock of Rutgers University demonstrate the climate effects of any even regional nuclear war. Dr. Ira Helfand of Physicans for Social Responsiblity states such climate effects would lead to disease and famine perhaps around the world.

5|14K 6|140 The draaft SPEIS report for the Complex Transformation 2030 program does not report the true environmental and health impacts of the plan.

The assumed "national security" benefits of the proposed Complex Transformation program do not balance its environmental and public health dangers. Again, the relationship between nuclear deterrence and national security is not clear. No evidence suggests that nuclear weapons deter terrorism; Instead, they put humankind at risk of extinction. There is no reason to believe that the Complex Transformation will contribute to the national security.

7|13A

8|7F 5|14K (cont) Hundreds of thousands of nuclear weapons workers have been exposed to ionizing radiation.In 2000 the government admitted that workers at DOE and other facilities have been harmed. Unknown numbers of peoplke have been exposed and sickened from low-level ionizing radiation from both nuclear bomb testing and radiation leaks from weapons facilities.

Karpen, Leah
Page 2 of 2

5|14K (cont) The health effects for workers anad residents should be considered by NNSA in its Complex 2030 plans.

9|2H In short, the draft is incomplete and lacking in necessary information.

10|3A Additional nuclear weapons production is totally unncecessary in view of the existing stockpile of nuclear weapons. In fact, the most appropriate number of nuclear weapons should be zero.

11|1F Production of new nuclear weapons is inconsistent with U.S.. obligations under the Treaty on the Non-Proliferation of Nuclear Weapons.

12|9B I propose, instead, that any appropriate facilities be converted quickly to manufacture of components for solar energy, wind energy, and other renewable energy alternatives. Climate change cannot wait for muddling around with useless nuclear facilities.

Respectfully submittetd,

Leah R. Karpen

(Mrs.) Leah R. Karpen
Concerned Citizen
Member, PSR

Kasper, Pege
Page 1 of 1

PC_2082

Levens, Matthew

From: Pege Kasper [pkasper@washoe.k12.nv.us]
Sent: Thursday, April 10, 2008 10:19 AM
To: Complex2030
Subject: Living in Nevada is a great life style. Most of Nevadans believe in being indepedent and staying ou

1|2O Living in Nevada is a great life style. Most of Nevadans believe in being indepedent and staying out of others affairs. Unfortunately when the Nevada test site was suggested & built, our state was not truly listened to. We as a nation need to have some sort of comprehensive plan for the use and storage of nuclear energy. Please let us go slow and think it out, like the Iroquios indians, thinking seven generations of the impact of our decisions now. please do not go forward without proper thought. Pege Kasper Washoe County resident ,Reno, Nevada

1

Katherine, Anna
Page 1 of 1

PC_1704

Levens, Matthew

From: Anna Katherine [annakath@earthlink.net]
Sent: Wednesday, April 02, 2008 8:06 PM
To: Complex2030

Concerning the proposed Complex Transformation Plan:

I am writing to register my opposition to this proposal.
I am a citizen of New Mexico and live in Santa Fe.
1|9H I am against this plan because:
*It is too expensive to build and operate.
2|14N *A serious seismic event in the area would risk radioactive and chemical exposure, possibly result in latent cancers
3|14M.3 in the large population within a 50 mile radius.
*It would increase water use by 43,000,000 gallons. We are already very short
4|14E.2 on water in New Mexico.
*It would generate increasing radioactive waste. WIPP has no more room; Area
3|14M.3 (cont) G in LANL is due to close in 2015.
*It would generate vastly more chemical waste -- where will that go?
*It is very questionable whether more plutonium pits are needed. The Pantex
5|SC.1 plant is authorized to reuse up to 350
existing pits per year. Also, the Moscow Treaty requires that deployed nuclear weapons be cut to 2200 by 2013.
Won't this lessen how many new pits are required?
*What guarantee is there that what happened at Rocky Flats (closed because of contamination) won't happen at Los Alamos?
3|14M.3 *The canyons around LANL are already contaminated. They drain into the Rio Grande, which when the new water
diversion project is completed, will be part of Santa Fe's drinking water. We do not need a lot more contamination.

Thank you for your consideration,
Anna Katherine
210 Gonzales Road
Santa Fe, N.M. 87501

1

Katz, Michael
Page 1 of 2

PC_2066

Levens, Matthew

From: Michael Katz [way.new@earthlink.net]
Sent: Thursday, April 10, 2008 6:33 PM
To: Complex2030
Subject: Comments on Draft Complex Transformation SPEIS

Dear Theodore Wyka and colleagues,
Thank you for the opportunity to comment on the Draft Complex Transformation SPEIS. I consider myself a stakeholder in this process, as follows:

[1] I live barely 41 miles from Lawrence Livermore National Laboratory (LLNL), in the same county. [2] I am a taxpayer. [3] I have a contracting relationship with one of LLNL's contractors. (My side business contracts with one of that contractor's side businesses.) [4] I am personally familiar with the management model adopted when the management of LLNL and LANL shifted from the University of California (UC), to a consortium that now includes for-profit partners like Bechtel. (I am a former subcontractor to NASA, via prime contractor Lockheed Martin.) [5] I am a graduate and actively involved alumnus of UC. [6] I live barely a mile from the UC laboratory where Plutonium was first isolated. [7] I live just four blocks from the former house of LLNL founder Edward Teller.

I have two serious concerns about the SPEIS:

1|70 [A] The SPEIS fails to consolidate nuclear-weapons development to a level that would truly serve national-security or environmental-quality requirements. That level would be zero: a complete elimination of weapons development.

2|16A There is simply no rationale for continued nuclear-weapons development at any NNSA-managed facility. The U.S. is now its only opponent in a unilateral arms race. While Russian foreign-policy intentions remain uncertain, the remaining Soviet nuclear arsenal is stable in both qualitative and quantitative terms. While Chinese foreign-policy intentions are troubling, there is no evidence of Chinese efforts to expand its nuclear arsenal beyond a "minimal deterrent" posture.

3|13A1 Continued U.S. development of nuclear weapons actively harms our national security in three ways. First, by maintaining an ongoing weapons-development infrastructure, we risk the proliferation of U.S. and allies' innovations to current and potential adversaries. Proliferation risks include espionage (as was orchestrated by Pakistan's notorious A.Q. Khan), negligence (as in the case of LANL's Wen Ho Lee), and weapons-acquisition attempts by non-state actors (which have been documented).

4|1J Second, by continuing to design and build new nuclear weapons, the U.S. loses any credible moral authority to dissuade the proliferation of nuclear weapons to non-nuclear powers. Each new nuclear power is a threat to global stability, and to U.S. security.

5|14O Third, further nuclear-weapons development maintains the risk of long-term or even catastrophic environmental degradation at weapons-development sites like LLNL.

To quote Pogo, in other words, we have met the enemy and he is us.

1|16A (cont) A truly successful SPEIS and Stockpile Stewardship Management Program would, therefore, completely end any further development of nuclear weapons in the U.S. Among other follies, it would eliminate:

6|3A
* The so-called "Reliable Replacement Warhead."
* Any further explosives testing at LLNL's Site 300.
* Any further detonation of depleted uranium, high explosives, or other toxic or radioactive materials on LLNL's open-air firing tables.

7|9H 8|18B [B] My second concern is that the "Complex Transformation" SPEIS proposes to decimate the labs' workforce, even while the management consortium's management fee has drastically

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Katz, Michael
Page 2 of 2

PC_2066

increased.

9|19A It is public knowledge that when the Congress mandated competitive bidding for the management of LLNL and LANL, it multiplied the management fee by a factor of 10. The Congress' then-majority described this bonanza as a reward for improved management.

10|9B Having been a subcontractor to federal aerospace programs through a similar for-profit contractor, I know this claim to be false. Lockheed Martin's management of NASA programs was the least competent performance that I have worked under anywhere in the private or public sector. Its incompetence, redundancy, waste, and overcharges to taxpayers extended all the way down its subcontracting chain. In almost every case, Lockheed's involvement was more hindrance than help to NASA staff professionals.

9|19A (cont.) Based on my experience, then one can presume the NNSA's radically higher management fee to be a mere "corporate welfare" subsidy to Bechtel, and to other politically connected consortium members like Texas A&M University. This windfall will not deliver better security (at any level) to the U.S. public; we will be lucky if management of the labs (and their day-to-day security matters) does not substantially degrade.

Against this backdrop of unwarranted management overcharges, NNSA is proposing to eliminate some 20-30% of the labs' nuclear-weapons workforce. That number is actually too small: For the reasons outlined above, 100% of the labs' workforce should be shifted out of nuclear-weapons work. But while smaller, less-costly programs would serve the taxpayers well, that does not necessarily mean that lab employees or contractors should be terminated at the proposed rates.

7|9H (cont) Facilities like LLNL and LANL represent remarkable concentrations of training and talent. These scientific and technical resources have been misdirected to the design of weapons of mass destruction -- weapons programs that should have been terminated decades ago. Still, the nation's interests are not necessarily served by simply putting these bright people out on the street. Indeed, as when the former USSR's nuclear-weapons and aerospace programs were dismantled, such terminations could pose certain security and proliferation risks.

The labs' workforce is a vital resource toward pursuing emerging national goals like energy independence and climate-change mitigation. The "Complex Transformation" program should seek to thoroughly convert the labs' mission and workforce to these genuine national purposes. Pursuing these goals would pose far lower short-term environmental hazards. Achieving them would substantially reduce the negative environmental impacts of the whole national economy and way of life.

"Complex Transformation" should therefore occur first at the level of the labs' mission. Once these facilities have been reoriented toward a defensible research agenda -- and once the labs' management fee is reduced to a more reasonable level, approximating UC's historic management fee -- the workforce should be systematically evaluated for the contributions each member can or cannot make toward these new 21st-century goals.

Thank you for considering these arguments for [A] completely eliminating further development of weapons of mass destruction at NNSA facilities, and [B] systematically reorienting the NNSA facilities and workforce toward genuine national objectives.

Respectfully yours,

Michael Katz
2835A Buena Vista Way
Berkeley, CA 94708
<way.new@earthlink.net>
Tel. (510) 845-6717

2

Kaufman, Paul

Page 1 of 1

PC_1867

Levens, Matthew

From: storyland99@yahoo.com
Sent: Sunday, April 06, 2008 12:19 AM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

16A I'm saying NO to a new generation of nuclear weapons. Let's start dismantling the entire program and put our efforts, energy, and tax revenues to much better use. The way to peace is not through war!

Sincerely,
Paul Kaufman
PO Box 966
Montague, MA 01351

cc:
Senator Edward Kennedy
Senator John Kerry
Representative John Olver

1

Kaufman, Toby

Page 1 of 1

PC_1246

Levens, Matthew

From: tobyk@interiorsystems.net
Sent: Monday, April 07, 2008 12:23 PM
To: Complex2030
Subject: Complex Transformation SPEISComments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|16A There is no place in our world for nuclear weapons. A multi-national plan to remove them all from our planet must be of highest priority.

There is also no place for energy derived from nuclear power until, if ever, there is a safe way devised to dispose of the toxic waste byproducts.

Sincerely,
Toby Kaufman
13811 Eldridge Ave.
Sylmar, CA 91342

cc:
Senator Dianne Feinstein
Senator Barbara Boxer
Representative Brad Sherman

Kawakami, Holly
Page 1 of 1

PC_1990

Levens, Matthew

From: Holly Kawakami [hcsk@unm.edu]
Sent: Thursday, April 10, 2008 5:34 AM
To: Complex2030; The Secretary
Subject: call for extension of comment tine in NM

Dear Secretary Samuel Bodman:

I am a citizen of New Mexico.

Although we appreciate that the NNSA granted the extension for comment on the SWEIS until the end of April, we ask you to please honor the request from the Secretary of our Environment Department for an extension for comment for 90 days - until July 8, 2008.

1|25 New Mexico's primary elected officials, Governor Richardson, Senator Bingaman, Congressman Udall, Pueblo Governors and the Mayors of the large downwind communities of Santa Fe and Espanola have made the same request.
The majority of New Mexico citizens want this extension.

This Complex Transformation plan will affect the lives and livelihoods of New Mexicans for generations to come. Please show respect for the insistent requests from the people from the impacted areas of New Mexico to at least have time to consider and respond to this very serious proposal.

Sincerely yours,

Holly Siebert Kawakami
Albuquerque, New Mexico

Keeling, Julie
Page 1 of 1

PC_242

March 5, 2008

Theodore A. Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
Department of Energy
1000 Independence Ave., SW
Washington, D.C. 20585

Dear Mr. Wyka,

1|16A I write to object strongly the new bomb-building effort named "Complex Transformation". We should turn our energy toward the complete destruction of nuclear weapons in

2|1F accordance with the Nonproliferation Treaty, instead of developing new nuclear weapons. I reject this proposal completely. Thank you.

Sincerely,
Julie Keeling

JULIE KEELING
P.O. BOX 991
GROTON, MA 01450

Keller, Dianne
Page 1 of 1

PC_326

March 26, 2008

U.S. Dept. of Energy
Ted Wyka, AIA-101
Complex Transformation Comment

Dear Sir:

1|16A — No new nuclear bomb plants! Please comply
2|1F — with the Non-Proliferation Treaty and honor our disarmament promises.

1|16A (cont.) — I oppose the "DOE's" "Complex Tranformation" plan --- Bombplex.

Sincerely,
Dianne Keller
819 Garden Way
Ashland, OR 97520

Keller, Keith
Page 1 of 1

PC_1127

Levens, Matthew

From: Physicians for Social Responsibility [webmaster@psr.org] on behalf of Keith Keller [saskckforkeith@msn.com]
Sent: Thursday, April 03, 2008 11:13 PM
To: Complex2030
Subject: The U.S. doesn't need new nuclear weapons

Apr 3, 2008

Mr. Theodore Wyka
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Wyka,

1|16A — The last thing this planet needs is for the United States to develop new nuclear weapons.
The US has a nuclear treaty obligation to
2|1F — actively seek to reduce and eventually eliminate nuclear weapons. When are we going to finally start to do this?

Sincerely,

Mr. Keith Keller
1221 Taylor Ave N Apt 201
Seattle, WA 98109-3342

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Keller, Martha
Page 1 of 1

PC_130

Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

NNSA National Nuclear Security Administration

Written Comment Form

Must be received on or before April 10, 2008.

1|16A I am opposed to Complex Transformation and the continued Building of nuclear weapons.

Martha Keller
1629 Old Chilhowee Rd
Seymour TN 37865

Please use other side if more space is needed.

Comment forms may be mailed to:
Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Comment forms may be faxed to:
(703) 931-9222
or sent by electronic mail to:
complextransformation@nnsa.doe.gov

You may also submit comments through the project website which can be found at:
http://www.complextransformationspeis.com

Kelley, Dee
Page 1 of 1

PC_195

To the Department of Energy

1|9H, 2|16A I understand you propose to spend $150 billion in taxpayer money to build more nuclear bombs. I am opposed.

2|16A (cont), 3|13A.1, 4|1J I am a Unitarian Universalist. Our 7th Principle is respect for the interdependent web of all existence, of which we are all a part. It is for this reason that I am morally opposed to building more nuclear weapons. We already can destroy the world. I cannot see the advantage to this kind of spending as a deterrent to nuclear war. What we need to do is eliminate nuclear weapons and this horrific threat to life as we know it.

Dee Kelley

4429 Cline Road
Amarillo, Tx 79110

Kelley, Marylia
Page 1 of 28

Tri-Valley CAREs
Communities Against a Radioactive Environment
2582 Old First Street, Livermore, CA 94551 • (925) 443-7148 • Fax (925) 443-0177

PC_958

Peace Justice Environment since 1983

April 30, 2008

Public Comment and Analysis
Part One: The Nuclear Weapons Complex-wide Impacts

Submitted to

The U.S. Department of Energy,
National Nuclear Security Administration

Submitted as comment for

Draft Complex Transformation
Supplemental Programmatic Environmental Impact Statement
DOE/EIS-0236-S4
(also known as the "Bombplex" plan)

Submitted by

Tri-Valley CAREs
Marylia Kelley, Executive Director
Robert Schwartz, Staff Attorney
Jedidjah de Vries, Outreach Director
Robert Civiak, physicist, consultant on the Curatorship alternative

Tri-Valley CAREs' "Part One" comment document is structured as follows:

1. Public Comment Period
2. Purpose and Need
3. Costs / Cost Comparisons
4. Consolidation / Alternatives / Curatorship Option in Detail
5. Nonproliferation / Treaties and International Law
6. Timing / "Cart before the Horse"
7. Security and Terrorism
8. Environmental Justice
9. Segmentation / Kansas City Plant
10. Document Structure / Environmental Impacts of "Preferred Alternative"

NOTE: Tri-Valley CAREs' "Part Two" comment document follows with specific analyses of the SPEIS' environmental impacts on Livermore Lab and surrounding California communities.

Kelley, Marylia
Page 2 of 28

PC_958

PART ONE: COMPLEX-WIDE IMPACTS

1. The Public Comment Period is Insufficient and Must be Extended:

The issues embedded in the Dept. of Energy (DOE) National Nuclear Security Administration's (NNSA) draft "Complex Transformation" plan are of great significance to the country and, in particular, to the millions of people who live near facilities that will be impacted by the plan. As we wrote earlier (and reiterate here), a 90-day extension of the comment period, from April 10, 2008 to July 8, 2008, on this draft Supplemental Programmatic Environmental Impact Statement (SPEIS) is necessary for the following reasons:

1|2E1

First, the additional time is needed to ensure that everyone impacted by the rebuilding (or transformation) of the nuclear weapons complex will have sufficient opportunity to provide comment. While Tri-Valley CAREs and colleague organizations have undertaken to alert and inform their members about the comment opportunity, the present comment period simply does not provide enough time for word of the plan to reach everyone who has a stake in the future of the complex.

Second, the time is needed to ensure that the public comments have maximal technical depth and analysis. The draft SPEIS is a lengthy and technical document. Reading, parsing, and understanding it requires a huge investment of time and effort, especially for the lay public that may experience extreme difficulty with the details of the plan and its overuse of dense technical jargon and acronyms. An extended comment period will allow for submittal of more thoughtful, in-depth comments. This is not only a public good, but will also benefit DOE NNSA and other decision-makers by giving a more accurate picture of the public's perspectives, analysis, criticisms and feedback.

So, while we recognize that DOE NNSA did extend the comment period from April 10, 2008 to April 30, 2008, we maintain that the comment period is none-the-less insufficient given the complexity of the draft document and other considerations. And, we again call on DOE NNSA to extend the public comment period by the full 90-days requested by Tri-Valley CAREs, Senator Jeff Bingaman, Representative Tom Udall and others.

2. The "Purpose and Need" as Outlined in the SPEIS is Legally Deficient:

2|1C

In the draft Complex Transformation SPEIS, the purpose and need section is largely predicated on a policy document, the 2001 Nuclear Posture Review, of waning importance that will soon lose all significance. Moreover, the draft SPEIS does not contain adequate information to evaluate the alternatives considered on the basis of NNSA's stated purpose and need. Finally, the purpose and need statement articulated by NNSA is missing consideration of alternate ways to accomplish the stated mission.

Under the Council on Environmental Quality's (CEQ) regulations implementing NEPA, an EIS "shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action." 40 C.F.R. § 1502.13. According to the draft Complex Transformation SPEIS, the underlying purpose and need addressed in the

Kelley, Marylia
Page 3 of 28

PC_958

SPEIS is to: (i) "maintain core competencies in nuclear weapons"; (ii) "maintain a safe and reliable nuclear weapons stockpile"; and (iii) "[c]reate a responsive nuclear weapons infrastructure that is cost-effective, and has adequate capacity to meet reasonably foreseeable national security requirements; and consolidate Category I/II SNM at fewer sites and locations within sites to reduce the risk and safeguard costs." SPEIS at S-12. NNSA claims that the fundamental principle underlying its evaluation of alternatives is that the Stockpile Stewardship Program (SSP) "must continue to support existing and reasonably foreseeable national security policy." *Id.*

2|1C (cont.)

Furthermore, NNSA states that the Complex Transformation SPEIS "does not analyze alternative U.S. national security policies. Rather, it examines the environmental effects of proposed actions and reasonable alternatives for execution of the program based on the existing and foreseeable changes in this policy." *Id.*

Outdated Basis:

The existing national security policy with regard to nuclear weapons is principally controlled by the 2001 Nuclear Posture Review (NPR), a classified document transmitted to Congress in December 2001 and only partially made public in 2002. In the Nuclear Posture Review Report, former Secretary of Defense Donald Rumsfeld stated that "Congress directed the Defense Department to conduct a comprehensive Nuclear Posture Review to lay out the direction for American nuclear forces over the next *five to ten years*." Nuclear Posture Review Report at Foreword (emphasis added). Since the NPR was issued in late 2001, it is clearly at or near the end of its usefulness. In fact, Congress has passed legislation requiring the next Administration to conduct a comprehensive NPR upon taking office. As such, it is entirely inappropriate for NNSA to base its plans for Complex Transformation on a document of such limited import. And it is doubly inappropriate for NNSA to foreclose consideration of viable alternatives that may result from a new national security policy, particularly when the next NPR will be conducted shortly.

Costs are Offered as Rationale, but are Missing:

Although NNSA claims that the purpose and need for Complex Transformation is driven, in part, by considerations of cost, the draft Complex Transformation SPEIS does not contain sufficient information to allow for objective consideration of the alternatives on this basis. Pursuant to CEQ's NEPA regulations, the section of an EIS analyzing alternatives should present "the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decision maker and the public." 40 C.F.R. § 1502.14. Here, NNSA has neglected to do so.

3|5I

The draft Complex Transformation SPEIS lacks adequate information to allow the decision-maker and the public to evaluate the cost-effectiveness of each of the alternatives under consideration. Also, there is no data to support NNSA's assertions that the preferred alternatives would increase economic efficiency and thus serve the stated purpose and need for Complex Transformation. The draft SPEIS should be revised to include such information in both raw and comparative form (as in charts or graphics).

Kelley, Marylia
Page 4 of 28

PC_958

Impacts of the Preferred Alternative Cannot be Discerned:

The draft Complex Transformation SPEIS fails to present the environmental impacts of the proposed action and the alternatives in comparative form, as required under CEQ's regulations. *Id.* Although the draft Complex Transformation SPEIS contains a number of charts, none of these permit a comparison between the environmental impacts of the proposed action and the other alternatives under consideration. *See* S-68 – S-94. CEQ's regulations implementing NEPA further specify that an EIS "shall be concise, clear, and to the point[.]" *Id.* at 1502.1. Here, the sheer number of acronyms used in the draft SPEIS and the lack of a clear organizational structure thwart any attempts to grasp the intricacies of the document, particularly by members of the public.

4|7N1

Furthermore, the preferred alternative is an amalgam of the options presented in the draft document. The preferred alternative does not fall within the boundaries of any of them and so its impacts are unknown.

Lack of Reasonable Alternatives:

Because a PEIS, such as the draft Complex Transformation SPEIS, constrains future decision-making, it "must therefore analyze alternatives in sufficient detail to prevent foreclosure of options with insufficient consideration." *'Ilio'Ulaokalani Coalition v. Rumsfeld*, 464 F.3d 1083, 1096 (9th Cir. 2006) (citations omitted). In this case, the draft SPEIS fails both to analyze reasonable alternatives and analyze those alternatives considered in sufficient detail. The alternatives analyzed in the draft Complex Transformation SPEIS are based on the need for a more responsive Complex infrastructure that has: (i) "[a]ll necessary technical and industrial capabilities"; (ii) "[a]dequate production capacity for a smaller stockpile, including pit production"; (iii) "[a] smaller size for more cost-effective operations"; and (iv) "[e]nhanced security, particularly for activities involving special nuclear materials." SPEIS at 2-2. This sweeping mandate could be served by alternatives that NNSA either neglected to consider in the draft SPEIS or inadequately analyzed.

5|2K25

Where, as here, the purpose and need for the proposed action is not, by its own terms, tied to a specific parcel of land, the range of alternatives that must be evaluated is broadened. *See 'Ilio'Ulaokalani Coalition*, 464 F.3d at 1098 (citations omitted). In the draft Complex Transformation SPEIS, NNSA fails to consider alternatives outside the NNSA nuclear weapons complex, with the exception of a limited mention of the White Sands Missile Range. Given the expansive purpose and need statement in the draft SPEIS, it is unreasonable for NNSA to neglect consideration of other alternatives outside the current nuclear weapons complex.

6|2K26

One example that has significant environmental impacts is the SPEIS' failure to consider consolidation of plutonium and highly enriched uranium from Livermore Lab to a DOE facility with secure storage capacity that is not an NNSA "Complex Transformation" site (e.g., Idaho Lab) or to a secure facility owned by another federal agency (e.g., the Defense Department). Because the draft SPEIS proposes to keep these materials at Livermore Lab until 2012 (and then move the plutonium twice) to accommodate "Complex Transformation," workers and

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surrounding communities are asked bear unnecessary risks. We note that the DOE has given Livermore Lab a "variance" from demonstrating that the site can comply with the Department's 2005 Design Basis Threat. Thus, the community bears what we believe is an unacceptable risk in the event of a terrorist attack. Moreover, the risks posed by a release of nuclear material in the event of a severe earthquake on one of the nearby faults is not analyzed in the draft SPEIS. 6|2K26 (cont.)

In addition, the range of alternatives considered in the draft SPEIS is insufficiently broad in light of the stated purpose and need for Complex Transformation. For instance, NNSA does not appear to have evaluated truly consolidating the nuclear weapons complex, which would mean closing down a number of sites. 7|7A5

Lack of justification for new plutonium pit manufacturing

The following deficiency was pointed out by Tri-Valley CAREs in its "scoping" comment and was not properly addressed in the draft SPEIS. The JASONs review of the DOE NNSA weapons labs' plutonium "aging" data must be included in the PEIS and fully reflected in the "Purpose and Need." The JASONs report of November 20, 2006 on plutonium pit lifetimes essentially states that the plutonium pits in U.S. nuclear weapons will remain reliable for approximately 100 years at a minimum (and perhaps much longer as a maximum). The average age of a U.S. nuclear weapon in the enduring arsenal is now about 25 years. These data undercut any possible justification, based on plutonium aging or reliability, for transforming the complex so that it can produce new plutonium pits and/or building a new arsenal of so-called Reliable Replacement Warheads (RRW). While the JASON review is noted in the draft SPEIS, the data on plutonium pit lifetimes is merely mentioned and is not used a framework for any meaningful analysis. 8|5C1

Moreover, the potential connections between the RRW program, the proposed new pit production facility at the Los Alamos Lab and the Complex Transformation plan as a whole must be detailed. DOE NNSA officials tell the public that there is not a connection between these three elements. Yet, the pit production now envisioned as the preferred alternative for Complex Transformation is sized to produce at least 50 certified (war reserve) plutonium pits per year. The pit capability at Los Alamos Lab is presently sized at 20 pits/year. The campaign to produce spares for the W88 (due to Rocky Flats closure) has been completed. The number of replacement pits that could be needed for weapons destructively tested each year is less than 20.

Therefore, it is difficult ***not*** to make a connection between the preferred alternative of 50/80 pits at Los Alamos Lab and the desire of top DOE NNSA officials to move forward with the RRW program. Congress cut funds for RRW last year. The draft SPEIS supports capabilities that would not be "needed" without the RRW program, or some similar, yet undisclosed, new weapons project. 8|8B1

It appears that DOE NNSA is crafting the "Purpose and Need" in compliance with its own desires, not Congress, not the American people and certainly not NEPA. If DOE NNSA does not agree that the "purpose" of the Complex Transformation plutonium pit production capability at Los Alamos Lab is to make pits for RRWs, then DOE NNSA should explain in detail for what purpose the full number of 50/80 pits will be "needed."

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3. Costs and Price Comparison of Alternatives are Missing:

Complex Transformation's preferred alternative means building new nuclear weapons plants, including making plutonium bomb cores at Los Alamos Lab in NM and a new Uranium Processing Facility at Y-12 in TN. Noticeably missing from the document are cost estimates.

The Government Accountability Office (GAO) had previously released a cost estimate that Complex 2030 (now called Complex Transformation) would likely cost upwards of $150 billion dollars. The GAO also noted "DOE's history of poor project management," meaning implicitly that figure could be larger yet. DOE NNSA has said there will be a transition period in which Life Extension Programs and the rest of the Stockpile Stewardship Program continue while Reliable Replacement Warheads are phased in. Does this mean that the NNSA nuclear weapons budget may rise when one of the professed reasons for Complex Transformation is to reduce costs?

Some, even within the DOE, believe that $150 billion is an extremely low estimate for the cost of maintaining the current system while building a new, not-so-consolidated set of facilities and then transitioning over to them. The costs of this should be included in the PEIS so that the public and all decision-makers can have a clear picture of the full price tag of this project, including the preferred alternative and reasonable alternatives to it. 3|9I (cont.)

The PEIS should include a cost analysis for each alternative to facilitate meaningful comparisons between them. A Curatorship alternative (see below), for example, may have a lower cost than the options currently being considered by DOE NNSA. These safer, more secure, options that focus on maintenance of the existing arsenal and minimize changes (i.e., Curatorship) and on full compliance with the nuclear Non-Proliferation Treaty (i.e., disarmament) are viable, reasonable, and must be analyzed in the final document -- including their relative costs.

We note that we also asked for a comparison of costs in our "scoping" comments -- and that the draft SPEIS continues to proffer alleged cost savings in its purpose and need, but without providing any of the cost information needed to evaluate the claim (or compare alternatives).

4 (a). Complex Transformation Fails to Consolidate the Weapons Complex:

Complex Transformation is not about true consolidation of the nuclear weapons complex. In exchange for giving up a number of outdated buildings that the Department of Energy (DOE) no longer wants or needs, DOE NNSA will get a number of new facilities that will pave the way for the development of new nuclear weapons, including through the Reliable Replacement Warhead program. 7|7A5 (cont.)

DOE NNSA does not appear to have evaluated truly consolidating the nuclear weapons complex, which would mean closing down or re-missioning a number of sites no longer needed for nuclear weapons activities, including Livermore Lab, its Site 300 high explosives testing range, the Kansas City Plan and others (details below).

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4 (b). Alternatives that are Reasonable, Viable and Meet Legal Obligations with Lower Costs and Fewer Environmental Impacts Have Been Excluded:

The Complex Transformation SPEIS does not adequately consider all viable alternatives, in particular the Curatorship alternative. According to CEQ, the section discussing alternatives "is the heart of the environmental impact statement." 40 C.F.R. § 1502.14. Pursuant to CEQ's NEPA regulations, agencies are required to "[r]igorously explore and objectively evaluate all reasonable alternatives." *Id.* at § 1502.14(a). Curatorship is a reasonable alternative, and it was not rigorously explored and objectively evaluated, as required under NEPA.

7|7A5 (cont.)

The Department claims that this alternative is not distinctly different from the current stockpile stewardship program. This demonstrates DOE NNSA's deliberate and willful misunderstanding of Curatorship and the reduction in cost and environmental footprint it would enable (as explained in detail below). Moreover, Curatorship entails consolidation of the nuclear weapons complex and its risks in ways that differ from any other alternatives analyzed in the SPEIS.

The PEIS ***should*** present the environmental impacts of the proposal and the alternatives in comparative form, thereby sharply defining the issues and providing a clear basis for choice among the alternatives by decision-makers and the public. The "Complex Transformation" draft PEIS fails utterly to do this.

For example, Curatorship, which was first suggested by Tri-Valley CAREs, was among the alternatives eliminated from further study in the draft SPEIS.

4 (c). The SPEIS Must Include a Curatorship Option; Curatorship is Superior to and Contains Advantages over Alternatives Analyzed in the Draft:

As noted, in its "scoping" comments, Tri-Valley CAREs (TVC) requested that NNSA include an alternative that reflects a "Curatorship" approach to maintaining the nuclear weapons stockpile. NNSA rejected that request stating, "[the] curatorship alternative does not define a programmatic alternative outside the range of alternatives evaluated in this SPEIS."[1] We dispute that conclusion. Curatorship is a fundamentally different approach to maintaining the nuclear weapons stockpile from the Stockpile Stewardship Program (SSP), which would continue under all of the alternatives evaluated in the Draft SPEIS. Many more R & D facilities would be closed under Curatorship than under the alternatives consider in the Draft SPEIS. More importantly, a Curatorship approach would lead to a safer, more secure and more reliable stockpile, at lower cost, than any of the alternatives considered. NNSA should include a Curatorship option as a programmatic alternative in the final SPEIS and should choose it as the preferred option.

10|5H2

Curatorship is Fundamentally Different from the Alternatives in the SPEIS

According to the NNSA, "The SSP emphasizes development and application of greatly improved scientific and technical capabilities to assess the safety, security, and reliability of

[1] Draft SPEIS page 3-129.

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existing nuclear warheads without the use of nuclear testing."[2] NNSA applies the results of the SSP to nuclear weapons in so called, "Life Extension Programs" (LEP). "An LEP is a systematic approach by weapon type that consists of a coordinated effort by the design laboratories and production facilities to: (1) determine which components will need refurbishing to extend each weapon's life; (2) design and produce the necessary refurbished components; (3) install the components in the weapons; and (4) certify that the changes do not adversely affect the safety and reliability of the weapon.[3] According to the Draft SPEIS, "NNSA has taken an aggressive approach to warhead refurbishment."[4] Through a joint process with the Department of Defense (DoD), NNSA has been authorized to make hundreds of changes to nuclear weapons, adding new components and modifying weapons' military characteristics. The joint NNSA/DoD Project Officer Groups (POGs), which are responsible for each warhead, often agree to changes that are intended to improve weapons performance, rather than solely to replace failing components.

In contrast, Curatorship would take a conservative approach to refurbishing warheads. Only if NNSA's surveillance activities, could demonstrate compelling evidence that components have degraded, or will soon degrade, and further analysis indicates that such degradation could cause a significant loss of safety or reliability, would NNSA replace the affected parts. The replacements would be remanufactured as closely to their original design as possible.[5] They would truly extend the life of the warhead, without improving its performance. A prohibition on improving warhead performance under Curatorship would require policy changes at DoD as well as at NNSA, since some improvements are initiated by DoD requests. Ideally, introduction of the Curatorship option would be accompanied by a shift in the nation's nuclear security policy that would discourage, if not prohibit, improvements to nuclear weapons. However, even without such a prohibition, NNSA could still implement virtually all of the changes discussed below.

10|5H2 (cont.)

Instead of relying on a massive R & D enterprise to improve scientific and technical capabilities, the Curatorship approach relies upon the extensive historical testing and certification activities, which have demonstrated that the existing stockpile is safe and secure. Under Curatorship, NNSA would still need skilled engineers and designers, with good judgment, to examine warheads and to determine when components must be replaced. NNSA would continue to operate state-of-the-art testing and engineering facilities to examine components. It would retain sufficient scientific and computing capabilities to apply analytical models to questions of weapon safety and reliability. It would make use of evolutionary improvements in computing technology to better appraise problems with weapons systems. On the other hand, NNSA would have no need to continue enhancing its understanding of weapons science or to maintain cutting edge research facilities in a wide range of technologies. Those capabilities are needed primarily to design and certify new components. Under Curatorship, most of NNSA's research and experimentation

[2] Draft SPEIS page 1-1.
[3] Draft SPEIS page 2-9.
[4] Draft SPEIS page S-12.
[5] In some cases, current environmental regulations might not allow exact remanufacture of old components. In others, original specifications have been lost or are incomplete. In these cases, NNSA would attempt to match the output of the old component as closely as possible. Those cases would require more analysis and testing than exact replacements, but would still be far less costly and introduce much less uncertainty than under the current approach, which allows major modifications.

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programs would cease and numerous facilities would be closed. The extent of those closures place the Curatorship approach, "outside the range of alternatives evaluated in the SPEIS."

Curatorship is sufficiently different from the SSP, which underlies all of the alternatives in the SPEIS, that NNSA should consider it as a separate programmatic alternative. The major change under Curatorship would be the closure of many more R & D facilities than the NNSA proposes to close under its project specific alternatives. However, the programmatic alternatives would also be affected. Since there would be fewer changes to the weapons remaining in the stockpile, the scale of plutonium operations, uranium operations, and assembly/disassembly activities could be reduced at the facilities proposed under any of the programmatic alternatives. In addition, R & D on plutonium and uranium would be reduced and several R & D facilities, which are not addressed in the SPEIS (and should be), would also be closed.

Note that in the context of this analysis, "closed" is defined as "no longer needed or used by NNSA for nuclear weapons activities." Should another use or "landlord" be appropriate, the site or facility may continue operating with a substantially changed or new mission and purpose.

Curatorship is Superior to the Alternatives in the SPEIS

10|5H2 (cont.)

According to NNSA, the benefits it is seeking through complex transformation include, "improved safety, security, and environmental systems, reduced operating costs, and greater responsiveness to future changes in national security policy."[6] Curatorship would be more beneficial in all of these areas than any of the alternatives in the SPEIS.

Improved Safety – Under Curatorship, no matter how many nuclear weapons remain in the stockpile, there would be fewer changes made to those weapons than under the SSP/LEP approach. Thus, NNSA could reduce the scale of plutonium operations, uranium operations, and assembly/disassembly activities at the facilities it chooses under any of the programmatic alternatives. A lower workload is inherently safer. In addition, studies of defects in nuclear weapons have shown that many more problems have occurred in new weapons and components than result from the aging of components in old weapons. That result was obtained on weapons that were well tested, before the nuclear testing moratorium went into effect. Thus, new components introduced to the stockpile through LEPs are likely to be less safe and reliable than the ones they replace. Any attempt by NNSA to make major changes to nuclear weapons, without nuclear testing, such as those proposed for a Reliable Replacement Warhead (RRW), could introduce significant safety and reliability problems into the stockpile.

Improved Security – The rational for improved security under Curatorship is similar to that for improved safety. Under Curatorship, the weapons complex would be more secure, simply because there would be less activity. There would be fewer R & D facilities requiring protection and less new classified information generated. There would be fewer contractor employees with access to sensitive facilities and classified information. There would also be fewer shipments of nuclear weapons and components around the country that offer opportunities to terrorists.

[6] Draft SPEIS page S-1.

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Improved environmental systems – Under the Curatorship approach, NNSA would close numerous facilities and complete sites that use high explosives, tritium, and other hazardous materials, such as Site 300 at LLNL. Those closures would produce significant environmental benefits beyond the alternatives considered in the SPEIS. Moreover, under Curatorship new facilities, such as the CMRR at Los Alamos Lab and the Uranium Processing Facility at Y-12, planned under the present programmatic preferred alternative, would not be built or operated, resulting in an additional significant environmental benefit.

Reduced operating costs – Operating costs would be dramatically reduced under Curatorship. NNSA currently spends about fifty percent of the Weapons Activities budget on R & D. That is appallingly out of step with any industrial activity in the United States. Large companies in the most research-intensive industries, such as computers and electronics, chemicals, aviation, and biotechnology, spend less than twenty percent of their revenue on R & D. Most spend less than ten percent. With over sixty-five years of experience in designing, producing, and maintaining nuclear weapons, there is no reason for NNSA to spend such a large percentage of its funding on R & D.

Under Curatorship, R & D would be directed primarily to improving surveillance and testing, to understanding how materials and components in existing weapons age, to supporting the manufacture and certification of rebuilt components, and to further validating computer codes to historical test results. Such R & D should amount to less than twenty percent of the Weapons Activity Budget.

10|5H2 (cont.)

Greater Responsiveness To Future Changes In National Security Policy – Under Curatorship, NNSA would not use this SPEIS to commit prematurely to building any major new facilities, before the next Administration completes a comprehensive review of the role of nuclear weapons in national security policy. Thus, the weapons complex could respond more rapidly to whatever changes that review proposes. Furthermore, the complex would not be burdened with excessive workload resulting from non-essential changes to nuclear weapons that are now routinely included in LEPs. In addition, NNSA will be able to respond more quickly to the infrequent aging problems that might arise in existing components. Its response will be to replace the problem component with a younger version of the same component, instead of designing a completely new component and scheduling its replacement as part of a complex LEP, which would take more time.

Curatorship is also superior to the alternatives considered in the SPEIS, because it would more closely align with United States' responsibilities under the nuclear Non-Proliferation Treaty (NPT) and the nation's nonproliferation goals. The New Agenda Coalition (NAC), an influential group of signatory states to the NPT, has called upon the nuclear weapons states to stop modernizing their arsenals. The NAC stated, "Any plans or intentions to develop new types of nuclear weapons or rationalization for their use stand in marked contradiction to the NPT, and undermine the international community's efforts towards improving the security of all states." Whether one agrees with the NAC that improving nuclear weapons is contrary to NPT responsibilities (and we believe it is), it is clearly detrimental to U.S. non-proliferation objectives. Stemming the proliferation of nuclear weapons requires the cooperation of all industrialized

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nations. To the extent that the NNSA's development of new and improved nuclear weapons alienates nations such as the New Agenda Coalition, it is undeniably contrary to U.S. non-proliferation goals.

NNSA argues that its joint planning with DoD minimizes the number of changes that are made to nuclear weapons during LEPs. It further claims they are not introducing new capabilities into the stockpile. Those are false or misleading claims. For example, the W76 LEP involves major discretionary changes to both the reentry body and to the warhead package. NNSA is replacing "organics" in the primary; replacing detonators; replacing chemical high explosives; refurbishing the secondary; adding a new Arming, Fuzing & Firing (AF&F) system, a new gas reservoir, a new gas transfer support system, a new lightning arrestor connector and making numerous other alterations to components that still function adequately.[7] The change to the AF&F system alone is creating a weapon with significantly improved military capability over the old version. While the old fuze permitted targeting of only soft targets, the new AF&F system adjusts the height of detonation, which gives the W76 a hard target kill capability for the first time. In addition, the new reentry body and other modifications allow the W76 to be delivered by the D5 missile, with much greater accuracy than its previous delivery vehicle. Few of the changes under this LEP (with the possible exceptions of replacing the gas reservoir and some organic adhesives) address age-related problems that would require fixing under the Curatorship option.

10|5H2 (cont.)

Differences between Curatorship and the Project Specific Alternatives

According to the NNSA, there is no "significant difference in the technical capabilities needed to maintain the weapons in the legacy stockpile from those required to design new weapons."[8] That may true under the SSP/LEP-based approach to maintaining the legacy stockpile, but it would not be true under the Curatorship approach. Under the Curatorship approach of replacing old components with new ones of their original design, no design capabilities are needed. However, it is not that difference alone that sets the Curatorship approach apart from the SSP approach. The major difference derives from asking whether NNSA needs to conduct a vast R & D enterprise to improve its capabilities to design new weapons and components. Under SSP, NNSA answers yes, under Curatorship the answer is no.

Much of NNSA's R & D is intended to improve its understanding of material properties and basic weapons physics in order to improve the complex computer codes that designers use to model the behavior of nuclear weapons. Those computer codes would play only a minor role in maintaining the stockpile under Curatorship. The legacy stockpile was developed using much simpler codes. We believe that the vast improvements that NNSA has already made to its computer codes under the SSP are more than sufficient for maintaining the legacy stockpile. Under Curatorship, we would halt all R & D related to development and validation of new computer codes for weapons design and simulation.

[7] Hans M. Kristensen. Administration Increases Submarine Nuclear Warhead Production Plan. www.fas.org/blog/ssp/2007/08/us_tripples_submarine_warhead.php.
[8] Draft SPEIS page 3-129.

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Another large class of NNSA's R & D activity seeks to improve its capabilities in a host of emerging technologies, such as nanoscale technology and microelectronics, which are useful only to design and develop new components for nuclear weapons. All such R & D would also cease under Curatorship.

The only large scale R & D activities that would continue under Curatorship are those which directly improve capabilities in surveillance and testing of the stockpile and to a lesser extent R & D in understanding how existing components age. Of course, all activities necessary for the surveillance and testing of the legacy stockpile and for testing and certification of rebuilt replacement components would also continue.

The question of whether NNSA should maintain a capability to design new nuclear weapons or modify existing weapons is not relevant to decisions regarding which R & D facilities should be retained. We believe that there is no need to maintain the capability to design new weapons and that doing so is contrary to nonproliferation objectives. However, should upcoming reviews of nuclear policy determine that a design capability should be retained, that would be primarily a matter of retaining experts in nuclear weapons design, rather than retaining R & D facilities to improve and extend weapon design codes and enhance NNSA's understanding of nuclear weapons science. The suite of facilities that NNSA would retain under the Curatorship option is more than adequate to maintain a basic nuclear weapon design capability, should policy makers decide to do so.

10|5H2 (cont.)

High Explosives (HE) R & D

The revisions to HE R & D activities are among the most significant differences between the Curatorship option and the Project Specific Alternatives. Under Curatorship, virtually all HE activities at LLNL and LANL (except for production of detonators at LANL) would cease. Activities at SNL and NTS would be significantly curtailed.

The Draft SPEIS states, "HE R&D is required to assure stability and dependability of HE in nuclear weapons."[9] That is a considerable overstatement. Substantial evidence shows that many types of HE used in the weapons of the legacy stockpile become more stable and dependable as they age. What the quote probably means to claim is that 'HE R&D is required to *improve the* stability and dependability of *new types of* HE in *new* nuclear weapons." That may be true, but is irrelevant under Curatorship, in which NNSA would not seek such improvements. The primary way to assure the continued stability and dependability of HE in existing warheads under Curatorship is to continue randomly selecting warheads from the stockpile to dismantle and thoroughly examine, as NNSA currently does under its surveillance program.

All HE R & D would cease under Curatorship, except for some studies of aging of HE formulations in existing weapons and components, which could continue at one site. Surveillance activities and quality assurance (QA) studies of HE in existing components would continue at Pantex, as would all R & D in direct support of the production mission.

[9] Draft SPEIS page S-53.

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HE formulation and processing would continue only at Pantex and testing would continue only at Pantex and NTS, except that testing of components (with up to 1 kg of HE) would continue at SNL as part of the surveillance program.

The facilities that would be closed under the Curatorship option include[10]:
The High Explosive Application Facility (HEAF) at LLNL;
All HE facilities at Site 300 at LLNL;
TA-9, TA-14, TA-16, TA-36, TA-46 and TA-53 at LANL; and
Explosive Applications Department facilities at Sites 9920, 9930, 9939, and 9940 in Coyote Canyon and at facilities in Thunder Range at SNL/NM.

The Explosive Component Facility (ECF) at SNL/NM would remain open, but it would be significantly reduced in scale. Its mission would be reduced to surveillance, testing, and R & D directly related to better understanding lifetime issues in existing components. There would be no R & D on new HE formulations or new component designs, unless a catastrophic flaw is discovered in an existing component.

10|6H2 (cont.)

HE facilities at NTS would be significantly reduced in scale and Hydrotesting and subcritical experiments would cease (see below). The Big Explosives Experimental Facility (BEEF) might remain open for render-safe experiments and work for other DOE offices and other agencies. NNSA might occasionally perform tests at BEEF to study aging of HE and to understand defects that may develop in existing HE components, which are too large to conduct at Pantex. No fissile materials would be used in those tests.

A small level of R & D activity on aging and performance of main charge HE might continue at either LANL or LLNL, but the formulation, processing and testing of HE to support those activities would be conducted at Pantex or NTS.

Tritium R & D

The Draft SPEIS states, "Because warheads depend on tritium to perform as designed, there is a need for tritium R & D."[11] This statement highlights the difference between SSP and Curatorship. The properties of tritium are extremely well known. Because tritium decays with a 12.5-year half-life, the gas in weapons in the stockpile must be replaced periodically to keep them within design limits. It is absurd to state that R & D on tritium is needed, unless NNSA plans to change its tritium maintenance practices or modify weapons' Gas Transfer Systems (GTS). Under Curatorship, such modifications would not be made.

Tritium production activities (as defined in the SPEIS to include irradiation of tritium targets, tritium extraction, tritium recycle, reservoir refill, and GTS surveillance) would continue under Curatorship at SRS, much as they would under the preferred alternative in the SPEIS. However,

[10] This is only a partial list, as HE R & D is conducted at 120 building at LANL alone (Source: TechSource 2007d, page 3-1).
[11] Draft SPEIS page 3-90.

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future decisions about the size of the stockpile may preclude the need for target irradiation and tritium extraction for many years.

Under Curatorship, all tritium R & D at LANL would cease and the Weapons Engineering Tritium Facility (WETF), located at TA-16, would be closed.

All NNSA-related tritium activities at LLNL would also cease. The LLNL Tritium Facility, within the Superblock, would most likely be closed. Therefore, it goes without saying that the expansion of the LLNL Tritium Facility, called the Tritium Facility Modernization Project, would not need to be undertaken and would cease. Most tritium activity at LLNL is related to NIF target design and support. Since the NIF would no longer be used by NNSA (see below), all NNSA-related tritium operations at LLNL would cease. However, DOE's fusion energy or science programs might continue operating the NIF and might choose to continue working with tritium targets. In that case, LLNL would retain a very small tritium handling capability (without either R & D or target manufacturing capability).

Tritium activities at SNL/NM would continue in support of neutron generator production and surveillance, including R & D for production support and quality improvement. However, R&D on new neutron generator designs and technology would cease.

NNSA Flight Test Operations

10|6H2 (cont.)

Under Curatorship, there would be no new bombs or components requiring flight tests. However, flight tests for surveillance of existing weapons would continue. While NNSA would conduct fewer flight tests, there would be no significant change to the alternatives for flight test operations from those considered in the SPEIS.

Hydrodynamic Testing

Hydrodynamic Testing is sometimes used (in conjunction with computer modeling) to examine issues of concern regarding the annual certification of existing weapons. It is more often used to perform weapons physics research, to improve modeling of nuclear weapons performance, to study new nuclear weapons geometries, to design and certify new nuclear weapons, and to evaluate the performance of new materials and components. Under Curatorship, it would be used for only the first purpose. That would require only a small fraction of the current testing rate.

Under Curatorship, all hydrodynamic testing activities would be consolidated at the DARHT facility at LANL. The concept here is that NNSA would choose one, and not continue to maintain multiple facilities. DARHT is the most modern of NNSA's hydrotest facilities. When DARHT becomes fully operational, it will be capable of performing tests with multiple shots from two different viewing angles on targets including full-scale mockups of any warhead in the current stockpile. About 100 hydrotests per year are performed at DARHT, which would be more than sufficient for all of the hydrotesting required under Curatorship. All other hydrotesting facilities at LANL would be closed.

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The Contained Firing Facility (CFF), all other firing point complexes, and all support functions for hydrotesting at LLNL's Site 300 would be closed. Together with the cessation of all HE-related activities, this would enable closure of Site 300 or rededication to another purpose.

All hydrotesting facilities at SNL/NM and Pantex would close, as they would under NNSA's preferred alternative.

The BEEF at NTS is used primarily for weapons physics and other testing that has little direct contribution to the annual certification of existing weapons. It would have little continuing mission within the Curatorship program. However, it might stay open to support other DOE programs and in support of other agencies, including DHS and DOD. If so, NNSA might occasionally perform a test there, if it is too large to conduct at DARHT.

The U1a facility at NTS is used mainly for subcritical experiments, which provide information on the performance of plutonium, uranium and other materials, primarily to improve or validate computer codes. This activity would cease under Curatorship and U1a would be closed or maintained in a standby condition.

Major Environmental Test Facilities

10|5H2 (cont.)

The SPEIS identifies more than thirty "Major Environmental Test Facilities (ETFs)." NNSA has used those facilities for multiple purposes including R & D on new component and weapon designs and for certification of new components and weapons. Under Curatorship, there would be no development of new components or weapons and those uses would drop out. Some Environmental Test facilities have also been used to test and validate changes in computer models. Those uses would also drop out.

NNSA also uses many of the ETFs to test components from weapons randomly drawn from the stockpile as part of its surveillance program. That activity would continue under Curatorship. In addition, testing for certification and quality assurance of necessary replacement parts would also continue under Curatorship.

Under Curatorship, NNSA would retain or replace only those ETFs that are essential to the surveillance program. Many of the facilities that are retained or replaced under NNSA's preferred alternative -- consolidate major environmental testing at SNL/NM -- appear to meet that criterion. There is, however, insufficient information in the SPEIS to determine whether each of those facilities would do so. Some of those facilities are likely to have very limited roles under Curatorship and would be candidates for closure.

One such example is the Annular Core Research Reactor (ACCR) at SNL/NM. The weapons and components in the existing stockpile have already been certified to withstand the high flux neutron environments that the ACCR can simulate. Components are not routinely retested in that environment as part of the surveillance program. Under the Curatorship option, if a component degrades or changes to a point that NNSA believes there is a reasonable probability that it could no longer withstand the required high flux neutron environment, it would be replaced. Thus, the ACRR would have little or no role under Curatorship and would be a

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candidate for closure. On the other hand, the ACRR is used to test the radiation hardness of components for other agencies, to test and develop nuclear fuels, and to produce radioactive isotopes. Therefore, DOE might continue to operate it as a user facility even with little or no NNSA mission.

Sandia National Laboratories, California (SNL/CA) Weapons Support Function

It is not clear whether NNSA is considering consolidation alternatives for the Sandia National Laboratory, California site. There are no proposed actions regarding SNL/CA in section 2-4 of the SPEIS and there is no preferred alternative identified in section 3-17. On the other hand, Section 3-13 describes facilities at SNL/CA and presents an alternative to "Consolidate SNL/CA non-nuclear component design and engineering work to SNL/NM." The environmental impacts of that alternative are discussed in section 5-18.

The SNL/CA Weapons Support mission has evolved over the past several decades into a robust weapons design and R&D activity.[12] Since SNL/CA has little to do with surveillance and testing of existing systems, it would have little or no mission under Curatorship. Most of its facilities would be closed, unless other DOE programs choose to support them. Specifically, Building 910, in which NNSA conducts engineering and technology R&D in electronics, surface physics, neutron detector research, and telemetry systems, would be closed. The Micro and Nanotechnologies Laboratory (MANTL) would also be closed. There is no need for NNSA to be at the forefront of these technologies under Curatorship. Two other major facilities at SNL/CA -- the Combustion Research Facility (CRF) and the Center for Integrated Nanotechnologies (CINT) -- are operated as user facilities by DOE's Basic Energy Sciences (BES) Program. They could continue operating, but most, if not all, NNSA activities at those facilities would cease.

10|5H2 (cont.)

Most of the remaining smaller facilities as SNL/CA would be closed under the Curatorship option. Any surveillance and testing activities or R&D in direct support of surveillance and testing that is conducted there could continue at other sites.

Effect of the Curatorship Approach on the Programmatic Alternatives

Under the Curatorship approach, NNSA must be prepared to replace any component in the weapons stockpile if it has degraded to a point where it could cause a significant loss of safety or reliability. Thus, NNSA would have to retain a capability to produce or acquire any part in the stockpile, or be able to obtain such a capability in a short time. That includes the nuclear components – the plutonium pit and the canned subassembly. Most likely, pits or components of canned subassemblies will need to be replaced infrequently and the workload for plutonium operations and enriched uranium operations will be lower than under the SSP/LEP approach.

In addition, plutonium operations will be reduced, because there will be considerably less R & D on plutonium. Some R & D on plutonium aging will continue. However, the vast majority of plutonium R & D would cease. R & D that seeks to extend NNSA's knowledge of the equation of state of plutonium would cease, as would other studies of the behavior of plutonium at high

[12] Draft SPEIS page 5-509.

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temperatures and pressures. Such research is needed only to improve computer codes to design new nuclear weapons. It is unlikely that there would be a need to manufacture new pits under the Curatorship approach, since there would be no new nuclear weapons. NNSA's own aging studies have concluded that it is unlikely any existing pits will fail due to aging for another seventy years or so. Nevertheless, it would be prudent to retain a basic capability to produce pits in case there is a problem with an existing warhead.

R & D on the basic properties of enriched uranium operations would also cease. NNSA will continue to disassemble and assemble canned subassemblies under its surveillance program. However the workload for disassembly/assembly will likely be reduced, since there will be fewer changes to components inside the canned subassemblies than occur now as part of LEPs. On the other hand, the rate of disassembly of warheads that have been retired from the stockpile might increase.

The workload for weapons assembly and disassembly operations would be only a little lower under Curatorship than under the SSP/LEP approach. Disassembly and assembly activities for the purpose of surveillance and testing would remain the same. There would still be regularly scheduled programs, at about the same rate as LEPs, to replace aged components in weapons. However, NNSA would replace only those components that truly need to be changed and it will make few, if any, design changes to those components. As already noted, disassembly of warheads that have been retired from the stockpile might increase.

10|5H2 (cont.)

Tri-Valley CAREs' comments on the programmatic alternatives in the SPEIS to restructure SNM facilities appear in later sections, below. Suffice it to say here that a change from Stockpile Stewardship to Curatorship, by itself, would not have a major effect on the alternatives for enriched uranium or assembly/disassembly operations. For plutonium operations, there would be no need for more than a true capability-based production alternative and only minimal R & D.

Changes under Curatorship to Programs and Facilities not Addressed in the SPEIS

Non-Nuclear Production Facilities

The vast majority of components in a nuclear weapon are non-nuclear. NNSA has chosen not to consider consolidation options for manufacture of non-nuclear components. Under Curatorship, a capability-based approach would be sufficient for non-nuclear components. Such an approach would include the possibility of consolidating the non-nuclear production capabilities of SNL/NM and the Kansas City Plant (KCP). NNSA should examine such an option.

High Energy Density and Pressure (HEDP) R & D

NNSA has numerous facilities it uses to create high pressures, densities, and temperatures for studying the behavior of materials under conditions similar to those in an exploding nuclear weapon. They are referred to collectively as HEDP facilities. The SPEIS notes that no consolidation of HEDP facilities is considered, except for the consolidation of major

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hydrodynamic test facilities.[13] All HEDP facilities would be candidates for closure under the Curatorship approach. The major purpose of most HEDP facilities is to improve the computer codes used to design and simulate the behavior of an exploding nuclear weapon. Current codes are more than sufficient to analyze almost all issues that might arise in existing nuclear weapons. Those weapons underwent extensive nuclear testing before the United States entered into the test ban moratorium. In the unlikely event that a future issue affecting the safety or performance of a weapons in the stockpile arises, which cannot be resolved with sufficient confidence using existing codes, the component in question would be replaced or other steps would be taken to ameliorate the issue.

Some of the HEDP facilities can be used to produce X-rays or other effects that are used in environmental testing of components. However, other major Environmental Test Facilities, which would remain in operation under the Curatorship option (see above), can produce similar effects. Therefore, all of the HEDP facilities listed below would be candidates for closure. Some of them may be useful for R & D in other areas including basic materials science, astrophysics, and energy production. Those facilities might remain in operation if other DOE programs or other agencies choose to support them.

Laser Facilities Not Needed Under Curatorship
The National Ignition Facility (NIF) at LLNL
The Janus Laser at LLNL
The Trident Laser at LANL
The Petawatt Laser at SNL/NM
The Nike Laser at the Naval Research Laboratory
The Omega Laser at the University of Rochester

10|5H2 (cont.)

Pulsed Power Machines Not Needed Under Curatorship
The Atlas Facility at NTS
The Z Machine at SNL/NM
The Saturn Facility at SNL/NM

Gas Guns Not Needed Under Curatorship
The Joint Actinide Shock Physics Experiment Research (JASPER) Facility at NTS
The Shock Thermodynamic Applied Research STAR Facility SNL/NM
Several smaller gas guns at LLNL, LANL, and SNL/NM, some of which may be scheduled for closure under consolidation alternatives for Hydrodynamic Testing or Major Environmental Test Facilities.

Microsystems, Nanotechnology, and Advanced Electronic R & D

NNSA supports a substantial amount of R & D on microsystems, nanotechnology and advanced electronics for new nuclear weapon components. Under Curatorship, there would be little or no introduction of new components into nuclear weapons and little need for NNSA to perform such

[13] Draft SPEIS page 2-17.

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research. Research in microsystems, nanotechnology, and advanced electronics contributes to other missions, including fostering the competitiveness of US industry. However, unless NNSA's state of the art facilities for R & D on those technologies is supported by other programs or agencies, they would be candidates for closure under the Curatorship alternative.

Such facilities include:
The Micro Electronics Development Lab at SNL/NM
The Microsystems and Engineering Sciences Applications (MESA) Facility at SNL/NM
The Center for Micro- and Nanotechnology at LLNL

Los Alamos Neutron Science Center (LANSCE)

LANSCE is a pulsed spallation neutron source. At LANSCE, a linear accelerator produces high-energy protons, which strike a target of tungsten metal producing copious neutrons. The protons and neutrons are used in a wide range of applications. NNSA operates LANSCE as user facility, but most of the beam time is devoted to NNSA activities. The primary activities are proton radiography for R & D on high explosives during detonation and collection of nuclear cross-section data on actinides and radiochemical tracers, which enable refinements to nuclear weapons codes. Neither of those activities would continue under Curatorship. LANSCE would be closed, unless another DOE office takes over its operation.

Advanced Simulation and Computing (ASC) Facilities

10|5H2 (cont.)

For a long time, NNSA has used state-of-the-art computers and codes in its design efforts to simulate the behavior of nuclear weapons. When the weapons in the current stockpile were designed, several parameters in those codes had to be adjusted to conform with the results of underground nuclear tests. At that time, there was a broad consensus that no sophisticated new nuclear weapon could be certified without nuclear testing.

One of the major initial goals of the Stockpile Stewardship program was to improve its computing capabilities to better model nuclear weapons performance. Today, fifteen years and scores of billions of dollars later, NNSA believes that its improved computational and simulation tools allow it not only to certify the performance of the existing stockpile, but to design and certify new nuclear weapons. NNSA's ability to certify a new weapon, without testing, is controversial. However, there is no doubt that modeling existing weapons of the legacy stockpile is a much easier task. It is easier because the extensive results from nuclear testing of those weapons can still be used to baseline the new, much more sophisticated codes. In addition, this original test data had been augmented by an enormous amount of test data from hydrodynamic and other tests on the legacy designs.

Under Curatorship, NNSA would need no further improvement to its computing and simulation capabilities to certify the legacy stockpile indefinitely. That is mostly because there will be few changes to those designs. Indeed, the fundamental basis for continued certification will be the absence of change, as assured through vigorous surveillance and replacement of altered components with new ones of the original design. Under that model, modeling and simulation play only a subsidiary role. The improved simulation capability that NNSA has acquired to date

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is certainly up to the task of verifying that the minor changes, which might occur under Curatorship, would not adversely affect the safety or performance of the legacy stockpile.

10|5H2 (cont.)

Under Curatorship, NNSA would maintain its existing computing and modeling capabilities. It would halt all further improvement of computer codes, but could continue adapting the existing codes to run on its newest computers and could continue applying existing test data to those codes to better understand the behavior of the legacy stockpile under a variety of conditions. In addition, NNSA would cease its current practice of using computer procurements to aggressively pursue revolutionary new technology. Instead, it would procure computers with evolutionary improvements as they become available commercially.

5. The SPEIS Improperly Sidesteps (Non)proliferation Impacts, International Law, and Treaty Obligations:

In its "scoping" comments, Tri-Valley CAREs pointed out that it is unacceptable to brush aside a discussion of how DOE NNSA will ensure compliance with the nuclear Non-Proliferation Treaty (NPT), which is US law, especially with the regard to the new planned pit manufacturing capability, the Reliable Replacement Warhead and the "responsive infrastructure."

Under Article VI of the nuclear Non-Proliferation Treaty, the United States is obligated "to pursue negotiations in good faith on effective measures relating to cessation of the nuclear arms race at an early date and to nuclear disarmament, and on a Treaty on general and complete disarmament under strict and effective international control."

11|1J

The New Agenda Coalition, an influential group of signatory states to the NPT, has called upon the nuclear weapons states to stop modernizing their arsenals:

"Any plans or intentions to develop new types of nuclear weapons or rationalization for their use stand in marked contradiction to the NPT, and undermine the international community's efforts towards improving the security of all states."

On June 1, 2006, Hans Blix issued a recommendation for freeing the world of Weapons of Mass Destruction. In that document, the United States was described as "exploring the possibilities of developing new types of nuclear weapons." In response, the report recommended:

"Any state contemplating replacement or modernization of its nuclear-weapon systems must consider such action in the light of all relevant treaty obligations and its duty to contribute to the nuclear disarmament process. As a minimum, it must refrain from developing nuclear weapons with new military capabilities or for new missions. It must not adopt systems or doctrines that blur the distinction between nuclear and conventional weapons or lower the nuclear threshold."

Kofi Annan, on Nov. 28, 2006 at Princeton University made this statement about nuclear weapons:

"All of the NPT [Non-Proliferation Treaty] nuclear-weapon States are modernizing their nuclear arsenals or their delivery systems. They should not imagine that this will be accepted as

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compatible with the NPT. Everyone will see it for what it is: a euphemism for nuclear re-armament."

The Complex Transformation PEIS should consider both the vertical and the horizontal nuclear proliferation risks of each alternative, including the fact that some of the options (e.g., the preferred alternative) may increase the threat of other countries getting and using a nuclear bomb as a result of our country resuming nuclear weapons production.

By nuclear weapons production, we mean both the RRW program's contemplated weapons production and the plutonium pit production of 50/80 bomb cores at Los Alamos Lab (as a nuclear core that contains sufficient material to detonate is a bomb). The draft SPEIS fails to include the needed (non)proliferation analysis.

11|1J (cont.)

Nor does the draft SPEIS consider any real analysis of a disarmament alternative. As with the Curatorship option detailed above, strict adherence to U.S. treaty obligations to disarm is a viable alternative that must be examined in the PEIS. Thirty-three thousand people demanded just such an alternative during the public "scoping" process. The DOE NNSA mentions the comments in the draft SPEIS, but sidesteps their substance and refuses to consider the facilities and capabilities that would be needed in a nuclear weapons complex to carry out a true Non-Proliferation Treaty / disarmament option. For example, a NPT / disarmament alternative may include transitioning key facilities from a majority nuclear weapons R & D and/or production mission to treaty verification and other, related new missions. Under this alternative, additional capacity for carrying out dismantlements would likely be needed. The Device Assembly Facility at the Nevada Test Site is one facility that should be analyzed in this context. So, too, would nuclear material storage and disposition requirements differ from other alternatives.

The NPT / disarmament alternative would not include a 50/80 plutonium pit manufacturing capability or a new Uranium Processing Facility. This alternative would have a different footprint and impacts than other alternatives analyzed in the draft SPEIS, and would be significantly different than the preferred alternative.

Or, to put it another way, the draft SPEIS speaks of Complex Transformation as being "capabilities based". However, a crucial capability is glaringly absent: the capability to disarm. The current draft SPEIS includes no discussion of what such a path would look like or what would be required to fulfill such a mission. This is a glaring omission that must be rectified.

6. Timing / Complex Transformation puts the "Cart Before the Horse":

2|1C (cont.)

Complex Transformation involves important decisions about the future of the nuclear weapons complex that should not be made in the final days of the Bush Administration and founded upon documents, such as the 2001 Nuclear Posture Review, whose future viability is extremely suspect. These decisions will have long-lasting consequences and should be subject to vigorous national debate and congressional oversight. The DOE NNSA is avoiding such oversight, in part, by asserting (without foundation) that it can implement Complex Transformation within its existing budget.

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In the SPEIS, DOE NNSA should not be allowed to dismiss alternatives that it claims fall outside the current scope of nuclear policy, which is defined by the 2001 Nuclear Posture Review. The Nuclear Posture Review is not a law, it is merely a policy statement developed by the Bush Administration. Changes in that policy are likely and imminent with end of the Bush Administration fast approaching. As such, NNSA should postpone any decisions regarding the future of the nuclear weapons complex until the new, Congressionally mandated and forthcoming Nuclear Posture Review is developed.

NNSA claims that it is merely implementing the national security policy established by the President and Congress, rather than developing its own policy. However, the draft Complex Transformation SPEIS would lock the nuclear weapons complex into a path that entrenches the current nuclear weapons policy, a policy that may radically change in the coming years. NNSA, in its haste to push the Complex Transformation plan forward before the next President takes office, is proposing to alter the nuclear weapons complex in a way that, as noted, may dictate or inhibit the national security policy of the next President.

2|1C (cont.)

DOE NNSA claims that it merely implements the national security policy established by the President and Congress, rather than developing its own policy. However, the "Complex Transformation" plan would lock the nuclear weapons complex into a path that entrenches the current nuclear policy, preempting a full and complete policy debate. "Complex Transformation," as some in Congress have stated, seeks to put the "cart before the horse."

The Cold War is over and the U.S. must adopt a new nuclear weapons policy geared toward non-proliferation, disarmament, and the abolition of nuclear weapons. Beginning next year, the new President will take the next steps toward the development of a new policy, and he or she should not have that policy prejudiced or pre-restrained by decisions DOE NNSA rushes to incorporate into a Record of Decision on Complex Transformation this year.

Although the SPEIS does include some discussion about making the nuclear weapons complex responsive to an evolving national security policy, it is only responsive within a narrow scope. The SPEIS is inadequate in this regard and should be altered to account from a broad range of options regarding nuclear weapons policy. Or, the document should be redrafted and re-circulated for public comment after publication of the new Nuclear Posture Review.

7 (a). Complex Transformation Fails to Prioritize Safety and Security:

12|13B1

The DOE NNSA clearly has a goal in mind for Complex Transformation; namely, the creation of a revitalized nuclear weapons complex. Unfortunately, NNSA first set out what it wanted to do, and then it attempted to consider safety and security within that narrow framework. A more rational approach would have been to make safety and security organizing principles for the future complex, and then develop a plan that embodied them.

7 (b). Analysis of Security and Terrorism Risks Must Include an Unclassified / Declassified Summary in the SPEIS, Particularly Regarding Health Impacts, Comparative Risks Between Sites and Other Information that Does Not Disclose Access or Other Security Vulnerabilities:

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According to the President in Homeland Security Presidential Directive-3, the world has changed since September 11, 2001. "We remain a Nation at risk to terrorist attacks and will remain at risk for the foreseeable future. At all Homeland Security Threat Conditions, we must remain vigilant, prepared, and ready to deter terrorist attacks."

Thus, the DOE NNSA should treat terrorist attacks as a threat that is reasonably foreseeable for the purposes of NEPA and the environmental impacts of which should be fully analyzed just as reasonably foreseeable accidents scenarios are analyzed in NEPA documents. This was affirmed in the San Luis Obispo Mothers for Peace v. NRC case and again in the Tri-Valley CAREs v. DOE case (both in the 9th Circuit).

Tri-Valley CAREs has a grave, overarching concern that plans to revamp the nuclear weapons complex may create attractive targets for terrorism and other acts of malice or insanity. Additionally each time that special nuclear materials, such as plutonium and highly enriched uranium, are shipped there may be additional opportunities for attack.

12I13B1 (cont.)

And, we have particular concern for the Livermore area, where densely-populated neighborhoods with tract homes are built right up to the fence line of the Livermore Lab Main Site. Houses sit a mere 800 yards away from the tritium and plutonium facilities that make up the Livermore Lab's so-called "Superblock". Releases of radioactive materials could have a profound and enduring impact on the more than 7 million people surrounding the Livermore Lab.

In our comments on "scoping," Tri-Valley CAREs said that it is critical that a security assessment be done that the public can provide input on – and that takes into account the various ways that these materials will be made vulnerable including storage, transportation, loading / unloading, packaging, processing etc. A generalized discussion of the pros and cons of each proposed location for these materials should be included. Further, we asserted that the nuclear materials should not be shipped gratuitously, and surplus materials should be immobilized in forms that are difficult to access and retrieve for would-be attackers.

Moreover, we stated we would expect that the amount declared "surplus" to the nuclear weapons program would steadily increase over time as disarmament advances. We suggested this be studied as a part of the proposed alternatives (e.g., compliance with Non-Proliferation Treaty and Curatorship options). The draft SPEIS fails to do any of this.

Instead, the draft SPEIS merely lists the DOE NNSA sites for which terrorism impacts are considered in a classified appendix. Worse, the list in the Executive Summary of facilities for which terrorism is allegedly considered (at page S-64) ***does not match*** the list of facilities that is contained in the body of the draft SPEIS (at page B-18). And, there is no way to tell which list of facilities is the correct one.

13I13D1

In the Executive Summary, it states that potential impacts of malevolent, terrorist or intentionally destructive acts at Livermore Lab are analyzed in a classified appendix. In the full draft document, Livermore Lab is missing from the list of facilities analyzed in the classified appendix – and therefore, it may not be included.

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According to the draft SPEIS Executive Summary, "Depending on the malevolent terrorist, or intentional destructive acts, impacts may be similar to or would exceed accident impact analyses prepared for the SPEIS. These data will provide NNSA with information upon which to base, in part, decisions regarding transformation of the Complex… Although the results of the analyses cannot be disclosed in this unclassified SPEIS, the following general conclusion can be made: the potential consequences of intentional destructive acts are highly dependent upon distance to the site boundary and size of the surrounding population – the closer and higher the surrounding population, the higher the consequences. In addition, it is generally easier and more cost-effective to protect new facilities, as new security features can be incorporated into their design…"

Inadequate attention to security and terrorism vulnerabilities at Livermore Lab (in what should be both classified and unclassified analyses) may have led to proposals in the draft SPEIS (including in the preferred alternative) that could have a catastrophic impact on Livermore Lab workers and the surrounding populations.

13I13D1 (cont.)

First, DOE NNSA admits that the environmental and health impacts of a malevolent act or terrorism may exceed the limits of those analyzed in the SPEIS (in contradiction to the aforementioned legal decisions handed down by the 9th Circuit and common sense).

Second, DOE NNSA notes that the severity of impacts is related to the distance to the site boundary. In this regard, Livermore Lab is unique. Some DOE sites cover hundreds of square miles (e.g., Nevada Test Site), others cover scores or dozens of square miles (e.g., Los Alamos). The Livermore Lab main site, which houses significant plutonium, highly enriched uranium and tritium inventories, is a hair over one single square mile (1.3 square miles). The distance from the site boundary to the highly populated neighborhoods, with tract homes, apartments, little league fields, etc. is simply across the street. As noted, the distance from the "Superblock" tritium and plutonium buildings to these homes is about 800 yards. Some of the highly enriched uranium is located in a building that sits between the "Superblock" and the neighbors. There is no other location in the DOE NNSA complex that is situated to maximize impacts of a terrorist attack like Livermore Lab.

Third, DOE NNSA notes that the size of the surrounding population increases the impacts that would be suffered in a terrorist attack. For population size and density (as well as proximity), Livermore Lab is uniquely – and potentially catastrophically – situated. Livermore Lab is located in the East Bay region of the San Francisco Bay Area, about mid way between San Francisco, Oakland, San Jose, Concord and Stockton, California. More than 7 million people live within a 50-mile radius of Livermore Lab. The population of the City of Livermore alone is more than 81,000 – and growing.

Further, the DOE NNSA states that it is more difficult to protect older facilities, as they do not have security features incorporated in their design. The plutonium facility at Livermore Lab (where the administrative limit exceeds 3,000 pounds) is an old facility, nearly a half-century old. Its primary structure was constructed in 1961; the last major addition was completed in 1977.

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The preferred alternative in the draft SPEIS involves keeping large stockpiles of plutonium and highly enriched uranium at Livermore Lab until 2012. There is no consideration in the SPEIS of moving these materials to a non-NNSA site or to a Dept. of Defense owned site. Therefore, these nuclear bomb-making materials may be left at Livermore Lab – in a uniquely vulnerable situation – longer than they should or would otherwise be kept. Thus, the preferred alternative for the plutonium and highly enriched uranium at Livermore Lab is being allowed to trump safety and security in violation of NEPA (and common sense). Tri-Valley CAREs, its members and other Livermore Lab workers and other area residents are being unacceptably placed at risk. (Additional Livermore Lab specific impacts will follow in Part Two).

13|13D1 (cont)

In November 2007, the GAO released an audit of DOE's progress in securing nuclear materials around the country, including at Livermore Lab. The GAO found that while DOE had told Congress in 2005 that the agency would complete plans within one year to consolidate and better secure plutonium and highly enriched uranium (principally), only 2 out of 8 plans were in place. Among the 6 plans left undone was the one to remove all weapons usable quantities of special nuclear materials from Livermore Lab. According to GAO, the security costs of keeping these materials at Livermore Lab was nearly half a billion dollars (for 7 years). As stated, the SPEIS touts cost as an element of its "Purpose and Need." The security costs of leaving these materials at Livermore Lab that must also be considered in the SPEIS along with the potential health and environmental costs. The GAO report is titled, "DOE has Made Little Progress Consolidating and Disposing of special Nuclear Material."

8. The SPEIS Environmental Justice Analysis is Deficient:

President Clinton's Executive Order 12898 (59 FR 7629) mandated that federal agencies consider the potentially disproportionate effect of their activities on minority and low-income communities. The draft SPEIS does contain some discussion of environmental justice issues. But those sections are insufficient, particularly with respect to native people.

As we stated during "scoping," throughout history the native people of the United States have borne many of the highest costs of US nuclear dominance. The mining was done on land given to native people, the milling and processing has often occurred on native land, the testing of the

14|14J1

weapons and ultimately the disposal is slated for native land. Through this process, the US government has continued to disregard (for example, Yucca Mountain Final EIS) its agreements between Western Shoshone Nation in the Treaty of Ruby Valley of 1872.

The SPEIS must include an explanation of how the DOE NNSA can ignore an agreement between the US government and the Western Shoshone, which is a treaty between nations and the highest law of the land. If the DOE NNSA uses the claim that lands were taken by the U.S. through gradual encroachment as the quasi-judicial Indian Claims Commission (ICC) alleged and upheld by the subsequent Supreme Court decision (Dann vs US Government) that the Western

15|14J5

Shoshone lost title of their land, then it must explain how a ruling of a court within one nation (US Supreme Court) is binding upon both nations.

Further, the DOE NNSA needs to address the decisions of the Organization of American States Inter-American Commission on Human Rights (IACHR) and the United Nations Committee to

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Eliminate Racial Discrimination (UNCERD) which both found the U.S. to have violated the fundamental human rights of the Western Shoshone people with regard to the Indian Claims Commission Proceedings which led to the Supreme Court decision.

15|14J5 (cont.)

On March 9, 2006, UNCERD again urged the United States to "freeze", "desist" and "stop" actions being taken, or threatened to be taken, against the Western Shoshone Peoples of the Western Shoshone Nation, including threats related to ongoing weapons testing at the Nevada Test Site as well as efforts to build an unprecedented high-level nuclear waste repository at adjacent Yucca Mountain. The SPEIS needs to take into consideration both the IACHR and UNCERD decisions and describe the proposed action in the context of these decisions.

9. Improper Segmentation / The Kansas City Plant Must be Included in the SPEIS:

NNSA's plans to build a new Kansas City Plant (KCP) were illegally segmented from the Complex Transformation SPEIS. In addition, with regard to KCP, the DOE NNSA predetermined the outcome of the NEPA process and prejudiced the selection of alternatives.

As a rule, under NEPA, an agency may not divide a proposed action into smaller segments to avoid presentation of its full environmental impacts. On the contrary, it must determine if other activities are connected in such a way as to be considered parts of a single action, in which case they should be evaluated in the same EIS.

Here, the construction of a new multi-structure facility to house NNSA's non-nuclear component procurement and manufacturing operations, the new Kansas City Plant, was illegally segmented

16|12

from the Complex Transformation SPEIS. There is no rational basis for excluding this site from the SPEIS, other than NNSA's desire to move forward with plans for a new KCP with a lower level of environmental analysis, less public involvement, and without the delays that are likely to accompany the Complex Transformation SPEIS.

Of the eight active sites that are a part of the nuclear weapons complex, KCP is the only site to be excluded from analysis in the SPEIS. Significantly, KCP was included in the 1996 Programmatic Environmental Impact Statement for Stockpile Stewardship and Management, to which the SPEIS is a supplement.

According to NNSA, Complex Transformation could "produce significant benefits, including improved safety, security, and environmental systems, reduced operating costs, and greater responsiveness to future changes in national security policy." SPEIS at S-1. According to the Environmental Assessment (EA) for KCP, "[t]he proposed facility would meet current and future production requirements for NNSA in a modern, cost effective, and flexible manner through reductions in the current facility footprint while significantly reducing operational, maintenance, security, and energy costs." KCP EA at 8.

Thus, in both cases, the proposed actions are not only intimately related but serve the same underlying ends.

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Moreover, NNSA claims that, "[b]ecause the non-nuclear operations at KCP are essential and do not duplicate the work at other sites, no proposal for combination or elimination of these missions was deemed reasonable for evaluation in [the Complex Transformation SPEIS]." SPEIS at S-24. However, according to the KCP EA, Sandia National Laboratory (SNL), in Albuquerque, New Mexico "offer[s] the highest co-location benefits to NNSA." KCP EA at 17. SNL is the primary design laboratory for non-nuclear components, so a combination of non-nuclear component design and production at SNL is clearly an alternative worthy of consideration in the Complex Transformation SPEIS.

Relatedly, NNSA appears to have predetermined the outcome of the NEPA process with regard to KCP. Since KCP was excluded from consideration as part of the Complex Transformation SPEIS at an early date, no serious consideration was given to moving non-nuclear component production activities to another site in the Complex.

Under the Council on Environmental Quality's (CEQ) NEPA regulations, an EIS must be "prepared early enough so that it can serve practically as an important contribution to the decision-making process and will not be used to rationalize or justify decisions already made . . ." 40 C.F.R. § 1502.5. In this case, NNSA decided several years ago to exclude KCP from the Complex Transformation process and then crafted the SPEIS in such a way as to lend support to that assumption.

16|12 (cont.)

NNSA's motives concerning the illegal segmentation are transparent: "NNSA expects to make a decision on how to modernize [the Kansas City Plant] before it makes any decisions regarding the alternatives analyzed in [the Complex Transformation SPEIS]." SPEIS at S-25. NNSA, in its haste to build a wasteful and unnecessary new facility, has segmented KCP from the Complex Transformation SPEIS, in violation of NEPA.

Finally, NNSA has prejudiced the consideration of alternatives in the Complex Transformation SPEIS by deferring necessary maintenance projects. With regard to the KCP, the Relocation Business Case for that facility states that maintenance was deferred "to capture near-term savings from avoiding investments that would be unneeded upon vacating the site." KCP Relocation Business Case at 27 (estimating a backlog of approximately $200 million deferred maintenance through 2014). This incredible statement occurs as part of a NEPA analysis that supposedly considers continuing operations at the current site as part of a no action alternative. In other words, in a bad faith effort to bolster support for its preferred alternative—a new KCP—NNSA neglected to perform necessary maintenance projects at the existing facility.

Since CEQ's NEPA regulations provide that "[a]gencies shall not commit resources prejudicing selection of alternatives before making a final decision[,]" NNSA has clearly violated NEPA by deferring such maintenance. 40 C.F.R. § 1502.2(f). This pattern has been repeated at other NNSA sites to paint a more attractive—but plainly distorted—picture of the alleged benefits of NNSA's preferred alternative as part of Complex Transformation.

4|7N1 (cont.)

10. Confusing Document Structure and Failure to Properly Analyze or Disclose the Environmental Impacts of the "Preferred Alternative" in the SPEIS.

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Tri-Valley CAREs ha been reading DOE NEPA documents, including numerous EIS and PEIS documents for the past quarter century, and this draft SPEIS is the most confusing 1,600 page jumble we have encountered.

First, it is not written in plain language. Instead, it features excessive technical jargon and novel (and dizzyingly numerous) acronyms. 40 CFR 1502.8 states that "Agencies should employ writers of clear prose to write, review, or edit statements, which will be based upon the analysis and supporting data from the natural and social sciences and environmental design arts." This document does not begin to approach the bar of "clear prose".

This has consequences. The public is unnecessarily inhibited from fully commenting and participating as envisioned by NEPA. Certainly, this has impacted the amount of time that Tri-Valley CAREs has had to invest in order to attempt to sort out various permutations of "program" and "project" options in the document.

4|7N1 (cont.)

These appear to be designed not for reasoned consideration of alternatives, but rather as variations on the narrow themes that DOE NNSA favors, e.g., do we put it here – or over there. In fact, it reads is as if DOE NNSA is more concerned about crafting some future legal brief defending against charges stemming from the exclusion of reasonable alternatives than in illuminating and differentiating real options upon which the public could comment.

Egregiously, the draft SPEIS nowhere contains an analysis of the environmental impacts of its preferred alternative. Instead, at the end, it culls a preferred alternative piecemeal out of various program and project options. The reader cannot discern the impacts of the specific actions that individually make up the preferred alternative. Nor can the reader determine the impact of the preferred alternative as a whole.

The text and the accompanying charts in the SPEIS contain summaries that purport to compare environmental impacts but fail utterly to analyze or disclose (or compare) the impacts of the preferred alternative. As noted in our Purpose and Need comments above, the preferred alternative is simply an unanalyzed "amalgam of options."

No reader or decision-maker can tell the individual or aggregate or cumulative or comparative (or any other) impacts of the preferred alternative. This central, serious failure makes the SPEIS useless and invalid as a basis for decision-making.

NOTE: PART TWO FOLLOWS AS A SEPARATE WORD DOC

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Peace Justice Environment since 1983

May 2, 2008

Public Comment and Analysis
Part Two: The Impacts of "Complex Transformation" on Livermore Lab and Surrounding Communities

Submitted to

The U.S. Department of Energy,
National Nuclear Security Administration

Submitted as comment for

Draft Complex Transformation
Supplemental Programmatic Environmental Impact Statement
DOE/EIS-0236-S4
(also known as the "Bombplex" plan)

Submitted by

Tri-Valley CAREs
Marylia Kelley, Executive Director
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Tri-Valley CAREs' "Part Two" comment document is structured as follows:

1. Tritium Research and Development at Livermore Lab
2. Bomb Blasts (Hydrodynamic Testing) at Livermore Lab's Site 300
3. Plutonium, Highly Enriched Uranium and Livermore Lab
4. Reliable Replacement Warhead / National Ignition Facility and Other Connections to "Complex Transformation" Outlined in the Livermore Lab 10 Year Site Plan
5. Safety, Security, Terrorism and Livermore Lab
6. Alternatives Analysis and the Future of Livermore Lab
7. Conclusion

NOTE: Tri-Valley CAREs' "Part One" comment contains the complex-wide impacts of the "Bombplex" plan, and was submitted separately on April 30, 2008.

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PART TWO: IMPACTS ON LIVERMORE LAB AND SURROUNDING COMMUNITIES

1. Under the Preferred Alternative (and Other Alternatives) in the Draft Complex Transformation SPEIS, Tritium Research and Development at Livermore Lab is not Consolidated, is not Properly Analyzed, is Slated to Increase Over Current Programmatic Use, and Will Harm the Public

Tritium is a radioactive form of hydrogen that is used to boost the explosive power of modern nuclear weapons. Tritium is difficult to contain, is not captured by HEPA filters, is only partially captured by other mechanisms, diffuses through almost anything, and will, operating histories show, invariably escape when used under high pressures. Once released, tritium can travel with the wind, can "rain out" easily on surrounding populations and can become organically bound in the food chain.

At the Lawrence Livermore National Laboratory (LLNL or Livermore Lab), tritium has been released to the air, soil and groundwater. Known tritium releases to the air from Livermore Lab total between 800,000 and one million curies. One curie is a large amount of radiation, equal to 37 billion radioactive disintigrations per second.

At the Livermore Lab main site, tritium has been measured in rainwater at a concentration of 147,000 picocuries per liter, more than 7 times the state and federal maximum contaminant limit (MCL) for water. The groundwater has been found to contain tritium above the MCL at both the Livermore Lab main site and its Site 300 high explosives testing range. At Site 300, the concentration of tritium in the groundwater has been measured at 2 million picocuries per liter, 100 times the MCL.

Livermore valley wines taken off the shelf and analyzed by Livermore Lab have been found to have nearly four times the tritium of other California wines. Local honey and other agricultural products have also been found to contain elevated levels of tritium. The milk of local cows has also been found to contain excess tritium.

Historically, and up to the present, the concentration of tritium in local agricultural products closely mirrors the amount of tritium activity that goes on at Livermore Lab. Years where tritium programs have increased -- so, too, the environmental burden of tritium increases. And, when tritium activity goes down at Livermore Lab, tritium concentrations in wine, honey and the environment decrease.

A sampling of annual tritium releases to the environment as reported by LLNL shows the following:

1986	1,128 curies
1987	2,634 curies
1988	3,978 curies
1989	2,949 curies
1990	1,283 curies

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1991	>1,000 curies
1992	177 curies
1993	137 curies
1994	137 curies

In 1990, in part due to concerns voiced by Tri-Valley CAREs regarding LLNL's tritium contamination, Livermore Lab realigned and substantially reduced its tritium use and inventory. In 1991, LLNL stopped filling the test bomb components with tritium on site. In 1992, the Nuclear Testing Moratorium Act terminated full-scale nuclear testing altogether. Tritium activities at LLNL declined -- and so did the releases. There is a direct correlation between the decreases in tritium activity and the amounts released to the environment. The downward trend of tritium releases represents a move in the right direction for LLNL. This downward trend will be reversed by the tritium Research and Development (R & D) activities under the preferred alternative in the draft SPEIS.

Because the SPEIS specifically exempts the tritium R & D activities at LLNL from consolidation -- or from termination or reduction – the document must contain the LLNL history of releases, information about how much tritium is in the local environment, and provide an analysis of how DOE NNSA proposes to ensure that releases do not occur in the future. Again, it is our analysis, based on our study of tritium use at LLNL and other sites, that increased activity will lead to increased levels of tritium in the environment. Tritium exposure is associated with a wide range of negative health outcomes, from cancers to increased susceptibility to suppressed immune system diseases to miscarriage and birth defects, among others.

The accidental releases documented at LLNL have been the result of not one but many factors, ranging from equipment failure to employee error. There is nothing to suggest that increases in tritium use at LLNL will not result in similar future accidents.

In 1965 and 1973, about 650,000 curies of tritium were released through the stacks of the tritium facility (Building 331) at LLNL. In 1991, a DOE Report of the Task Group on Operation of DOE Tritium Facilities listed the following accidents occurring between 1986 and 1991:

125 curies, released 12/15/86 due to a failed pump and cryogenic vessel breach
198 curies, released 4/14/87 due to an equipment failure and operator error
145 curies, released 1/19/88 unknown cause or stack monitor malfunction
138 curies, released 1/25/88 unknown cause or stack monitor malfunction
653 curies, released 5/15/88 due to unexpected presence of tritium in gases being vented
120 curies, released 8/1/88 unknown cause or stack monitor malfunction
112 curies, released 2/28/89 unknown cause or stack monitor malfunction
329 curies, released 8/22/89 due to improper pressure relief of container
112 curies, released 10/31/89 due to mistaken belief a palladium bed contained only deuterium and (non-radioactive) hydrogen
144 curies, released 4/2/91 due to improper preparation of a reservoir

The DOE task force further states that management failures at LLNL were the direct cause of the accidental release of tritium on 4/2/91 and the resultant radiological exposure of facility personnel.

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In addition to airborne releases, the SPEIS should also discuss the tritium in waste at LLNL and in releases to the sewage, soil, surface and (eventually) groundwater.

The draft SPEIS mentions but does not analyze the impacts associated with the manufacture and filling of tritium targets for the National Ignition facility mega-laser on site at the LLNL main site. This activity is likely to increase airborne tritium emissions, tritium-contaminated wastes and other environmental and health impacts of tritium at Livermore Lab and in the surrounding communities. According to the Livermore Lab 10 Year Site Plan (quoted in section 4, below) the National Ignition Facility is an "integral part" of the Complex Transformation plan. As such, it must be analyzed both with regard to programmatic alternatives and environmental and other impacts associated with the use of tritium and other elements.

Moreover, the draft SPEIS fails utterly to consider that the tritium R & D activities in the preferred alternative are driving a major expansion of the tritium facility at Livermore Lab under the Tritium Facility Modernization Project. This project includes:

- nearly doubling the size of the tritium facility (Building 331) by adding a new building of approximately 6,000 square feet to the existing tritium facility,
- renovating existing labs in the tritium facility,
- modifying labs to accommodate new and larger devices,
- introducing new activities into the tritium facility, including the manufacture of fission-fusion targets using plutonium,
- and more.

Further, according to other DOE documents, the tritium handling is slated to increase from the usage of about 3.5 to 5 grams per year to 30 grams per year "at risk" in one room beginning in 2009, after the Complex Transformation SPEIS ROD. The allowable overall inventory would be 35 grams.

There are approximately 9,800 curies per gram of tritium. Therefore, the "at risk" limit of 30 grams all available in use at one time in one room/operation is 294,000 curies. This is enough tritium to nearly equal the historically high accident levels at LLNL of the 300,000 curie and 350,000 curie tritium releases in 1965 and 1973.

According to Dr. John Gofman, the founder of LLNL's bio-medical division, those tritium releases were responsible for 120 cancers and 60 cancer deaths. The "preferred alternative" of giving LLNL a special "pass" and NOT consolidating the tritium out of LLNL carries a potentially severe impact.

Another way to look at what these amounts of tritium mean is to look at the number of disintigrations per second represented by this tritium. One curie, as noted, equals 37 billion radioactive disintigrations per second. If the 30 gram at risk limit is released, that represents 294,000 curies times 37 billion disintigrations per second – or more radioactive disintigrations per second than there are stars in the Milky Way galaxy.

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The draft SPEIS dismisses this tritium at LLNL as a "small quantity." If this is indeed the DOE's basis for not analyzing the potential impact on LLNL workers and the public, it is an improper one.

The LLNL facility is unique in the weapons complex because it is a geographically small and crowded site – the main site where the tritium facility is located is only 1.3 square miles. Moreover, homes and apartment buildings are build right up to the site boundary. A number of Tri-Valley CAREs members can see the stacks of the tritium facility from their homes and yards. The tritium facility is likewise visible when driving down Vasco Road and other major streets. The impact of an accident (or other release scenarios including earthquake or terrorism attack) with tritium were not considered in the draft SPEIS and must be.

Sandia, Livermore sits directly to the south of Livermore Lab. Because of the proximity of the encroaching population center toward Sandia and Livermore Labs, all tritium activities at Sandia, Livermore have been phased out. Tri-Valley CAREs advocates for a phase out of all tritium activity at Livermore Lab. This is a viable option that should be analyzed in the PEIS.

2. Impacts of Ongoing and Increased Hydrodynamic Tests at Livermore Lab Site 300 Were Improperly Excluded from the Draft SPEIS.

As part of the preferred alternative under the Complex Transformation plan, the Department of Energy National Nuclear Security Administration (NNSA) proposes to cease open-air hydrodynamic testing at Site 300 in 2009 and conduct future open-air hydrotesting at the Nevada Test Site. Livermore Lab's hydrotesting facilities would then be consolidated in-place. According to the draft SPEIS, the Contained Firing Facility (CFF) would be closed in 2015, which could enable transfer or closure of Site 300. However, according to LLNL officials, even if hydrotesting by NNSA at Site 300 ends, experiments will continue there by other agencies, including the Department of Defense and the Department of Homeland Security. In fact, Livermore Lab spokeswoman Susan Houghton has stated, "It's going to be an industrial site no matter what."

Currently, Livermore Lab is in the process of seeking an air permit from the San Joaquin Valley Air Pollution Control District. This permit, which represents an eight-fold increase over current levels, would allow the outdoor testing of explosives at Site 300, which is located just 6.5 miles from downtown Tracy, California and approximately one mile from the proposed 5,500-home Tracy Hills development site. The blasts could contain as much as 8,000 pounds of high explosives annually and scores of toxic and radioactive materials, including up to 20 mg (200 curies) of tritium and up to 5,000 pounds of Uranium-238 (depleted uranium).

If allowed to enter the body, depleted uranium has the potential for both chemical and radiological toxicity, and the two important target organs are the kidneys and the lungs. Tritium is known to cause a wide range of health problems, from birth defects to cancers. The open-air explosives testing to be performed under the permit will aerosolize these and other hazardous materials, which will then spread with the prevailing winds throughout the San Francisco Bay Area and Central Valley of California. *(See also comments of nearly 450 area residents, submitted separately by Tri-Valley CAREs).*

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One may wonder why Livermore Lab is seeking an air permit to perform increased open-air detonations at the same time as NNSA is proposing to cease such testing at Site 300 in 2009 under the Complex Transformation plan. The answer is likely that Livermore Lab is planning on performing further experiments at Site 300 on a "work for others" basis for other federal agencies. This is unacceptable. All open-air explosives testing and related experiments should cease at Site 300, which should then be closed to these types of activities.

In the draft Complex Transformation SPEIS, NNSA must consider an alternative that specifically involves the closure of Site 300 and/or transition to other environmentally-benign activities. According to the Council on Environmental Quality's (CEQ) regulations implementing the National Environmental Policy Act (NEPA), the section discussing alternatives "is the heart of the environmental impact statement." 40 C.F.R. § 1502.14. Pursuant to CEQ's NEPA regulations, agencies are required to "[r]igorously explore and objectively evaluate all reasonable alternatives." *Id.* at § 1502.14(a). The closure of Site 300 is a reasonable alternative, which should be thoroughly analyzed in the draft Complex Transformation SPEIS.

Further, even assuming Site 300 is merely transferred instead of closed, that is a connected action that must be analyzed in the draft Complex Transformation SPEIS. Under CEQ's regulations implementing NEPA, connected actions are those that "are closely related and therefore should be discussed in the same impact statement. Actions are connected if they . . . [c]annot or will not proceed unless other actions are taken previously or simultaneously." *Id.* at § 1508.25. In this case, any environmental impacts associated with the transfer of Site 300 should be analyzed in the draft Complex Transformation SPEIS, since that transfer could not proceed unless NNSA undertakes its planned status change for Site 300 as part the Complex Transformation plan.

Moreover, the cumulative impacts of future activities at Site 300 must be analyzed in the draft Complex Transformation SPEIS. Pursuant to CEQ's NEPA regulations, "'Cumulative impact' is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions." *Id.* at § 1508.7.

Since Livermore Lab officials have publicly stated that experiments for other federal agencies will continue at Site 300 in any event, such actions are clearly foreseeable. As such, the environmental impacts of these activities, whether conducted by the Departments of Defense or Homeland Security, should be analyzed in the draft Complex Transformation SPEIS.

In conclusion, all open-air explosives testing at Site 300 should cease. Whether this testing is done by DOE or another government agency, the risk to the community is the same. Central Valley residents, and in particular those from the fast-growing community of Tracy, should not have their health endangered by these activities. As acknowledged in the draft Complex Transformation SPEIS, Site 300 is a redundant facility inappropriately located for such hazardous activities. Therefore, all high explosives and bomb testing at Site 300 should cease and future efforts should focus on remediating its toxic legacy, as reflected by its status as a Superfund (CERCLA) site.

3. Consolidation of Plutonium and Highly Enriched Uranium out of Livermore Lab Needs Better Analysis – and Faster Action -- Due to the Encroaching Community and Other Unique Risks of Keeping Special Nuclear Material at This Location.

The plutonium and highly enriched uranium at Livermore Lab are vulnerable to a terrorist attack, a disgruntled employee scenario and to release in the event of a major earthquake, as well as other scenarios.

The draft SPEIS proposes to leave weapons usable quantities of plutonium in place at Livermore Lab until 2012. Further, the "preferred alternative" involves moving the plutonium from Livermore twice -- once to the Nevada Test Site and then again to the Los Alamos Lab in NM, presumably for use in the new plutonium pit manufacturing facility that is the "preferred alternative" in the SPEIS.

Tri-Valley CAREs requests that a far different option be analyzed. First, there is no need for new pit production facilities/capabilities at the Los Alamos Lab with the capacity of producing 80 pits a year (nor is the CMRR facility, let alone its potential 9,000 square foot expansion, fully justified or analyzed in the SPEIS). Second, the plutonium from Livermore Lab should be moved only once – and for safe and secure storage, not new bomb experiments. We suggest the following process:

First, undertake a study of potential storage sites. It need not take long. This study should not be limited to sites that are part of the Complex Transformation plan. For, if the plutonium from Livermore Lab were to be simply stored safely and securely at a remote location, that plutonium would not have a role in Complex Transformation. (It is possible that if the decision regarding moving the LLNL plutonium were made on the grounds of safety and security, a different storage site choice might emerge. For example, the DOE has excess underground secure storage at a large site that is not an NNSA site analyzed in the SPEIS. Too, the DoD may have excess secure storage facilities suitable for the job.)

This is an important point because, with the present plan, the tail of new nukes is wagging the dog of Livermore's plutonium. As noted, an unbiased analysis might show that the safest and most secure location for Livermore's plutonium is at a site that is not one of the eight involved in Complex Transfomation. Or, perhaps one of the eight is the best site (though it most certainly won't be Los Alamos -- the place the "preferred alternative" now proposes to send it). Point is, start with the analysis. We offered this comment at scoping, but unfortunately it was ignored in the preparation of the draft SPEIS.

Second, make the study of potential storage sites as transparent as possible. Bring in independent analysts, community members, affected tribes and other stakeholders.

Third, (and this can begin today) lay out a plan to safely package the plutonium at Livermore Lab. The Defense Nuclear Safety Board has cited Livermore Lab's plutonium facility for storing plutonium in paint cans and food tins. And, this is only the tip of the iceberg. Good procedures,

and a reasonable allocation of time and money will be required to package the plutonium for shipment.

Fourth, ship it to the selected location in as safe and timely manner as is possible. Allocate sufficient funds to ensure that it is stored safely and securely at the new site. Continue to involve independent analysts, communities, affected tribes and other stakeholders.

Similarly, the highly enriched uranium should be moved from Livermore Lab in a prompt manner. And, the material should be stored as safely as possible at the most secure location. The DOE should undertake a process similar to the one outlined above to determine the best location. And, the highly enriched uranium should be stored only, and not be used in bombs or in nuclear weapons experiments.

The SPEIS proposes to keep highly enriched uranium and plutonium at Livermore Lab at least for the next 5 years, yet it fails to consider the Livermore Lab's environmental record of accidents, spills, leaks etc. with these materials. There have been numerous fires and other accidents involving uranium at Livermore Lab. Below are just a few of the accidents and other problems at Livermore Lab involving plutonium.

Some Plutonium Mishaps at Livermore Lab: Over the years, there have been a number of accidents and oversights at Lawrence Livermore National Laboratory involving plutonium. The following is but a small sampling of such incidents:

- 1953-1962: Radioactive liquid wastes, including plutonium, are disposed of in unlined pits
- 1958: Livermore Water Reclamation Plant (LWRP) begins to distribute sludge to the public
- 9/13/1965: A fire involving about 100 grams of plutonium starts in Building 332
- 4/20/1967: A spill of radioactive liquid containing plutonium occurs in a storage area outside Building 332
- 5/25/67-6/15/67: Release of plutonium to the City of Livermore's sewer system contaminates sludge distributed by LWRP
- 1973: Unknown quantities of plutonium released to soil during transfer of solid materials from solar evaporators; LWRP stops distributing sludge to the public
- 4/16/1980: Flash fire in a glovebox allows plutonium to escape
- 3/1983: Routine handling of drums containing curium, americium, and plutonium results in a spill and the contamination of at least one worker
- 5/1987: Another release of plutonium to the City of Livermore's sewer system
- 1990: DOE testing finds elevated levels of plutonium in an off-site air monitor east of LLNL
- 7/9/1991: Monitoring indicates statistically significant increase in plutonium discharge to sewer system
- 10/24/1991: Torn bag results in plutonium powder being spread on the floor
- 10/29/1992: Two LLNL workers are contaminated after a can of plutonium oxide is placed in a bag
- 1994: EPA discovers plutonium above background levels in three city parks. The highest level occurs in Big Trees Park, a half-mile west of LLNL.

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- 1995: Deficiencies in safety practices lead to the shut down of all plutonium experiments and machining operations for 6 months
- 2/7/1996: Department of Energy reports that LLNL cannot account for 12 pounds of plutonium in its stockpile
- 2/2/1997: A worker at LLNL accidentally sticks himself with plutonium-contaminated metal
- 10/3/2003: A dozen LLNL workers are exposed to plutonium after a power outage caused the radioactive element to leak from its specially designed container
- 2004: Five workers at LLNL inhale plutonium particles while packaging radioactive waste
- 3/2005: Defense Nuclear Facilities Safety Board cites LLNL for storing plutonium in paint cans and food tins.

Plutonium represents a serious health hazard. A person is most likely to be exposed to plutonium by breathing it in. Other exposure pathways are also possible. Plutonium may remain in the lungs or move to the bones, liver, or other body organs. It generally stays in the body for decades and continues to expose the surrounding tissues to radiation, which may increase your chance of developing cancer and other health problems. The health effects of plutonium have been studied primarily by experiments done on laboratory animals. These studies have shown lung diseases from short-term exposure to high concentrations of plutonium. Animal studies have also reported an increase in lung, liver, and bone cancers from exposure to plutonium, as well as effects on the immune system.

In light of this, problems with the LLNL plutonium facility are relevant and must be examined in the SPEIS. The primary plutonium building was first built in 1961, and the latest major addition was built in 1977. Safety vulnerabilities such as the ventilation system and electrical system must be considered carefully.

Safety Features / Accident Response: According to a report issued by the Defense Nuclear Facilities Safety Board (DNFSB), the accident analysis and bases for calculating consequences used in the Draft SWEIS may be deficient. In a March 17, 2004 report, the DNFSB wrote that staff had reviewed LLNL's accident modeling and found its key assumptions highly questionable.

The DNFSB determined that more radiation was likely to escape from the LLNL plutonium facility in an accident than was calculated by the model. Page 3 of the DNFSB report states that the LLNL calculation of only 5% leakage (Leak Path Factor) of the radiation from a plutonium fire is "unrealistic and probably underestimates the extent of a release of unfiltered radioactive material from the facility."

The SPEIS does not discuss the environmental impacts of plutonium in Livermore at all – and must. In this context, we ask if DOE is still using the old 5% leak path factor?

We would also like the SPEIS to describe how integral Livermore Lab reliance on air monitors / emergency generators and negative airflow is. In this context, the SPEIS should include information about the October 2003 plutonium accident that resulted in a dozen lab employees potentially being exposed to airborne plutonium because glovebox seals, an emergency generator, an alarm system and negative airflow system all failed simultaneously. A case study should be in-

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cluded in the SWEIS describing how all of these things could have failed at once and describing how these types of failures will not happen again. (See also the partial list of accidents above).

Plutonium has been removed from soils at the Livermore Lab main site as part of the ongoing Superfund cleanup there. Plutonium has also been found at elevated levels in an off-site air monitor to the east of LLNL and in the top 2 inches of dirt in a City park to the west of LLNL. The impacts of continuing operations, including those that are part of the "preferred alternative" of the SPEIS at Livermore Lab includes risks that were not studied in the SPEIS and must be.

In addition to failing to consider the environmental and health risks of keeping this material at LLNL and the security risks (discussed in Part One and below), the SPEIS also fails to consider that its decision to name LLNL as a nuclear weapons design center of excellence for the future may involve LLNL operating a new plutonium foundry (currently under construction at LLNL).

The new plutonium foundry is intended to:
(a) prototype plutonium pits and develop new plutonium pit manufacturing techniques that would be used full-scale at Los Alamos Lab in the new pit manufacturing facilities under the SPEIS' "preferred alternative," and,
(b) in a related activity, help develop and prototype a new plutonium pit for the Reliable Replacement Warhead that LLNL is presently developing.

The new foundry, called L-cast, which is being built in the Livermore Lab plutonium facility (Building 332), is inextricably connected to the Complex Transformation plan, yet it is strangely absent from the draft SPEIS. It must be analyzed, including:

- Its potential health and environmental impacts,
- Its potential security impacts and vulnerabilities,
- Its potential to affect or defer the SPEIS "preferred alternative" to remove plutonium from LLNL by 2012 as well as its impact on any plans to accelerate the removal date, and
- Its constraining impact (along with the RRW program of which it a part) on the development of a consolidation alternative that would result in Livermore Lab's re-missioning.

4. Role of the Reliable Replacement Warhead and Continuing Nuclear Weapons Development at Livermore Lab as Part of Complex Transformation (e.g., as Outlined in the Livermore Lab 10 Year Site Plan) Must be Fully Transparent and Considered in the SPEIS

The Ten Year Site Plan for Livermore Lab (dated March 2007) contains the following references to the Complex Transformation plan:

- 10 Year Plan, Lab director George H. Miller's' statement (page i): "The Lawrence Livermore National Laboratory is an important part of that vision as a nuclear design resource and a center for innovative science and technology to help expedite the transformation… Success in the development of RRWs [Reliable Replacement Warheads] is essential to making the transformational changes envisioned…"

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• 10 Year Site Plan, page 3-2, "Livermore plays a prominent role… develop[ing] replacement warheads that will enable the Complex 2030 [Complex Transformation] transformation."

• 10 Year Site Plan, page 3-13, "NNSA's Complex 2030 [Complex Transformation] plan… calls for the significant changes to the nuclear weapons complex, and a modified mission that includes development, production and deployment of the Reliable Replacement Warhead (RRW) designs to replace major portions of the current stockpile…"

Tri-Valley CAREs' analysis of the draft SPEIS is that the "preferred alternative" for revitalizing and rebuilding the nuclear weapons complex is tied to the desire of DOE NNSA to continue the RRW program.

In essence, RRWs are the "enabler" for Complex Transformation as CT is a plan for the future of the nuclear weapons complex whose taproot is RRW -- and at the same time it would also be fair to say that Complex Transformation is likewise the "enabler" for RRWs as production would occur in refurbished nuclear weapons complex facilities and use the pits that are part of the 50/80 "preferred alternative" under Complex Transformation.

Perhaps a simpler way to put it is that RRW and Complex Transformation are inextricably linked. Yet, the SPEIS is opaque on this relationship, does not analyze it adequately, does not examine the associated environmental impacts and does not consider the constraining effect that enabling the RRW program has on the Department's own thinking (or lack thereof) regarding reasonable alternatives to the preferred plan.

Moreover, by keeping these relationships opaque, the SPEIS fails to adequately analyze the totality of environmental impacts associated with the RRW program. For example, Livermore Lab was chosen to develop the first RRW design. If that goes forward (and DOE NNSA is pushing Congress to get it funded in 2009 even after Congress cut it last year), what are the impacts on LLNL and the surrounding communities?

• 10 Year Plan, Page 1-3 and repeated on Page 4-5, "The establishment of NIF [National Ignition Facility] as a user facility, integrated with the available computational modeling capabilities and consolidation of the user community into a campus around the facility are an integral part of the LLNL Complex 2030 [Complex Transformation] vision."

• 10 Year Plan, page 1-4, "In support of the Complex 2030 [Complex Transformation] strategies, LLNL is improving its F&I [facilities and infrastructure], including:

- Steady progress is being made on deferred maintenance reduction.
- Sufficient F&I maintenance funding is committed (at the minimum 2% of replacement plant value) to assure the sustainment after FIRP ends.
- The Terascale Simulation Facility (TSF) is operating as a productive user facility for the three NNSA laboratories.
- The NIF is undergoing transformation to a national shared user facility..."

Why were these "integral parts" including NIF, the Tritium Facility Modernization Project that is "needed" for NIF, and the supercomputing complex referred to in the quotes not analyzed in

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the SPEIS. Was a deal cut between DOE NNSA Headquarters and LLNL management for certain nuclear weapon design facilities and programs to be "exempted" from consolidation or closure in order to appease one of the parties? It looks that way. Further, this inappropriately constrains the alternatives analysis.

• 10 Year Site Plan, page 1-5, "This year's TYSP [10 Year Site Plan] follows the framework of the Complex 2030 [Complex Transformation] vision… One tangible initiative is the line item proposal to consolidate target fabrication capabilities and associated personnel into a Target Fabrication Facility. This transformation accommodates user facilities and meets one of the important goals of the 2030 [Transformation] vision. In addition… "

Tri-Valley CAREs notes that the SPEIS describes neither a "Target Fabrication Facility" at LLNL nor the aforementioned Tritium Facility Modernization Project. What is the relationship between the facilities? To the Complex Transformation plan? Why are these relationships absent from the SPEIS?

Above are examples of the naming of Complex 2030 [Complex Transformation] in the LLNL 10 Year Site Plan, March 2007. Please reconcile the relationships outlined in that document with the lack of consideration of these facilities and programs in the SPEIS itself. And, in that context, we repeat that it appears as if promises about the outcome of the process have been made in advance of the final document and ROD.

We also request that DOE NNSA consider and include in the SPEIS any relevant information from the 2008 LLNL Site Plan (which Tri-Valley CAREs is attempting to obtain).

5. Safety and Security Vulnerabilities and the Threat / Consequences of Terrorism at Livermore Lab.

As we note in our Part One comment, Livermore Lab has been granted a "variance" from DOE NNSA and need not demonstrate compliance with the DOE's 2005 Design Basis Threat (meaning there is no assurance that LLNL has adequate defenses against a terrorist attack).

We also noted a significant discrepancy in the SPEIS; LLNL is listed in the Executive Summary as among the facilities whose security and vulnerability to terrorism is considered in a classified appendix to the SPEIS. Yet LLNL is missing in the body of the document (page B-18) when it likewise listed facilities whose security vulnerabilities were considered in the same classified appendix.

We refer the reader to our Part One comment for details, but note that either a severe earthquake or terrorist attack could have a catastrophic impact on the nearly 10,000 Livermore Lab employees, Sandia, Livermore's approximately 1,000 employees, the 81,000 people who live in Livermore and the 7 million people who live within 50 miles of Livermore Lab.

The administrative limit for plutonium at Livermore Lab is more than 3,000 pounds, enough for about 300 nuclear bombs. The administrative limit for highly enriched uranium is hundreds of pounds. The administrative limit for tritium is 35 grams. The Livermore Lab tritium facility

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(Building 331) and plutonium facility (Building 332) are "cheek to jowl" and vulnerable to a terrorist attack. As stated, the Complex Transformation plan leaves weapons usable quantities of plutonium and highly enriched uranium at Livermore Lab in place for the next 5 years. It fails to consolidate LLNL's tritium R & D and its preferred alternative supports an increase in programmatic activity with tritium at the Lab. These nuclear materials leave the people and the environment in this rapidly growing suburb at risk.

6. Alternatives Analysis and the Need to Rethink the Future of Livermore Lab.

Many of our members are residents of Livermore who would like to see the SPEIS include an exploration of alternative futures for the Livermore Lab, specifically a civilian science based alternative.

We note that Livermore Lab has great potential as a premier center for civilian research, for example in the area of modeling global climate change, research and development of non-polluting, renewable energy technologies and more. The current proposal would keep radioactive tritium at the Lab, and would continue use of Site 300 for open air bomb testing (albeit under the auspices of different federal agencies). Other futures are possible for the Livermore Lab and for this community and it is within the scope of DOE's authority and reasonable to expect that a NEPA review of the future of the nuclear weapons complex would examine an alternative future for Livermore Lab. We note that an alternative future for Livermore Lab goes hand in hand with the Curatorship alternative detailed in our Part One comment. It is not credible for DOE to stubbornly refuse to evaluate Curatorship for the complex and/or a post-Cold War, civilian science future for LLNL's mission and programs.

DOE should embrace its overarching mission to advance the national, economic, and energy security of the nation, instead of clinging to Cold War era nuclear weapons programs. A credible alternative future could be accomplished by "re-missioning" Livermore Lab. This would have benefits for the Lab, the community, the country, and the world. At a minimum, DOE's responsibility under NEPA is to evaluate such an alternative in its SPEIS.

Conclusion: Tri-Valley CAREs is a non-profit organization located in Livermore, California. Tri-Valley CAREs has been monitoring the activities of Lawrence Livermore National Laboratory and the nuclear weapons complex for 25 years. On behalf of our 5,600 members, many of whom are directly affected by the preferred alternative and other options in the Complex Transformation plan, we submit these comments on the DOE National Nuclear Security Administration Complex Transformation Supplemental Programmatic Environmental Impact Statement. We request that upon completion of the final SPEIS, DOE send Tri-Valley CAREs 2 complete copies, 10 additional Executive Summaries and 10 copies of the document on CD ROM. We thank you for this opportunity to comment.

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PC_507d

Buenaflor, Delight

From: Marylia Kelley [marylia@earthlink.net]
Sent: Saturday, May 03, 2008 1:28 AM
To: Complex2030
Subject: For DOE CT Comment: Berkeley, CA City Council Reolutions

Dear Ted: The message below, from Diana Bohm, was sent to me – but was intended for DOE as a comment on the Complex Transformation SPEIS. It does not appear that this was sent to the DOE email address. Therefore, at Diana's request, I forward it as her comment. Please direct any questions you might have about it to Diana Bohn <nicca@igc.org>. Thanks for accepting it. Thank you. --Marylia Kelley

Dear Marylia, Perhaps in my absence, someone can tell the DOE people about the City of Berkeley Resolution passed by City Council on 3/20 07.

The information can be found on
http://www.ci.berkeley.ca.us/citycouncil/2007citycouncil/packet/032007/03-20s.ht
m.

Text appears below.
diana bohn

This is the item as it appeared on the Berkeley City Council Consent Calendar:
Reliable Replacement Warhead Program (PDF, 128 KB)

From: Peace and Justice Commission
Recommendation: Adopt a Resolution requesting that Representative Barbara Lee, and Senators Barbara Boxer and Dianne Feinstein not support funding for the "Reliable Replacement Warhead Program, or appropriations or other benefits to the civilian nuclear power industry; and that the University of California and the U.S. Government not violate the Nuclear Free Berkeley Ordinance.Ý

1|16A

Financial Implications: NoneÝ

Contact: Manuel Hector Jr., Commission Secretary, 981-5110

Action:Ý Adopted Resolution No. 63,615ñN.S (PDF, 118) (as amended).:
Berkeley Antinuclear resolution

Here is the text of the entire resolution that was sent to the Council by the Peace & Justice Commission:

Nuclear Weapons Resolution:

WHEREAS, the Peace and Justice Commission advises the City Council on all matters relating to the City of Berkeleyís role in issues of peace and social justice (Berkeley Municipal Code (BMC) Chapter 369.070); and

WHEREAS, (Ord. 5784-NS ß 3, 1986)the Nuclear Free Berkeley Act, Chapter 3.68.010 of the Berkeley Municipal

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PC_508

Code found that, ìA. The intentional destruction of cities in war is the rule and not the exception. B. State, national and international governmental bodies have failed to control war and in fact, have in many cases, been responsible for war and the conditions of warî; and

1|16A
cont.

WHEREAS, Chapter 12.90.030 of the Nuclear Free Berkeley act says; ÝìThe people of Berkeley find that: The nuclear arms race poses an intolerable threat to humanityÖ.î and that ìthe threat to use nuclear weapons is an integral part of United States foreign policyÖ.î and ìsince the Nuremberg principles hold individuals accountable for crimes against humanity, and since nuclear weapons cannot be used without indiscriminately killing civilians and violating accepted international rules of war, then nuclear weapons are illegal, and should be prohibited within the Cityî and that ìWe will not remain silent while policies of global death and destruction are carried out in our nameÖ.î; and ìUranium mines, refining facilities, transportation of radioactive materials, nuclear reactors, and radioactive waste are part of a "nuclear fuel cycle" integral to nuclear weapons productionîÖ and îMining, refining, and transportation of radioactive materials directly endangers the health of the workers involved.

2|7B
14K
14Q

ÝÝÝÝTransportation of radioactive materials risks accidents releasing radioactivity into the environment. ÝÝÝÝRadiation is routinely released from all operating nuclear reactorsÖ while accidents such as Three Mile Island release still more.
ÝÝÝÝThere is no safe means known for the disposal of nuclear wasteÖ;î and

WHEREAS, the Nuclear Free Berkeley Act states that: ìNo person, corporation, university, laboratory, institution or other entity shall, within the City of Berkeley, knowingly engage in work for nuclear weapons;î and

WHEREAS: ìThe University of California's system-wide administration, which runs both Livermore and Los Alamos National Laboratories, Lawrence Berkeley LaboratoriesîÖas well as ÖïNumerous business firms that work under contract or sub-contract to produce nuclear weapons components,î Ô andÔsecurity requirements accompanying the nuclear weapons industry threaten the civil liberties of the people of Berkeley and restrict the freedom of information necessary to make decisions concerning the future of the community. ì(Ord. 5784-NS ß 3, Section 12.90.030 Findings.)

WHEREAS, when the Unites States ratified the United Nations Charter, it made a commitment to article 2.4 that states: ìAll Members shall refrain in their international relations from the threat or use of force against the territorial integrity or political independence of any state, or in any other manner inconsistent with the Purposes of the United Nationsî; and

WHEREAS, in 1996, the World Court unanimously ruled that: ìThere exists an obligation to pursue in good faith and bring to a conclusion negotiations leading to nuclear disarmament in all its aspects under strict and effective international controlî ; and

3|1J

WHEREAS, the Bush administration has laid out the ìReliable Replacement Warheadî plan to overhaul and upgrade the US nuclear weapons infrastructure and expand the USA nuclear weapons arsenal with the construction of ìComplex 2030î, a state of the art nuclear bomb factory, and has outlined the possibility of using these weapons in a nuclear preemptive strike; and

4|8B

WHEREAS, the Reliable Replacement Warhead initiative violates the policy of the Nuclear Free Berkeley ace and international law for the reasons stated above;

NOW THEREFORE, BE IT RESOLVED that the Council of the City of Berkeley ask Congresswoman Barbara Lee and Senators Boxer and Feinstein to oppose funding the ìReliable Replacement Warheadî plan including the construction of ìComplex 2030î, or appropriations or other benefits to the civilian nuclear power industry including the recently passed energy bill.

4|16A
cont.

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PC_508

BE IT FURTHER RESOLVED that the Council of the City of Berkeley requests that UC not violate the Nuclear Free Berkeley Ordinance (Ord. 5784-NS) and send a copy of this Resolution to the University of California Board of Regents asking them to oppose the development of these weapons at any UC facility, and send a copy of this resolution to Nancy Pelosi, Barbara Lee, Senators Boxer and Feinstein and UN Secretary General Ban.

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Marylia Kelley,
Executive Director

Tri-Valley CAREs
2582 Old First Street
Livermore, CA, USA 94551

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Email: marylia@trivalleycares.org or marylia@earthlink.net

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Tri-Valley CAREs
Communities Against a Radioactive Environment
2582 Old First Street, Livermore, CA 94551 • (925) 443-7148 • Fax (925) 443-0177

Peace Justice Environment since 1983

April 30, 2008

Theodore A. Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Re: Comments on the draft Complex Transformation SPEIS

Dear Mr. Wyka:

Tri-Valley CAREs is a non-profit organization founded in 1983 by Livermore, California area residents to research and conduct public education and advocacy regarding the potential environmental, health and proliferation impacts of the Department of Energy's (DOE) Lawrence Livermore National Laboratory (LLNL or Livermore Lab). On behalf of our 5,600 members, Tri-Valley CAREs submits the following comments on the draft Complex Transformation Supplemental Programmatic Environmental Impact Statement (SPEIS).

1|14.O.4

As part of the preferred alternatives under the Complex Transformation plan, the National Nuclear Security Administration (NNSA) proposes to cease open-air hydrodynamic testing at Site 300 in 2009 and conduct future open-air hydrotesting at the Nevada Test Site. Livermore Lab's hydrotesting facilities would then be consolidated in-place. According to the draft SPEIS, the Contained Firing Facility (CFF) would be closed in 2015, which could enable transfer or closure of Site 300. However, according to LLNL officials, even if hydrotesting by NNSA at Site 300 ends, experiments will continue there by other agencies, including the Department of Defense and the Department of Homeland Security. In fact, Livermore Lab spokeswoman Susan Houghton has stated, "It's going to be an industrial site no matter what."

Currently, Livermore Lab is in the process of seeking an air permit from the San Joaquin Valley Air Pollution Control District. This permit, which represents an eight-fold increase over current levels, would allow the outdoor testing of explosives at Site 300, which is located just 6.5 miles from downtown Tracy, California and approximately one mile from the proposed 5,500-home Tracy Hills development site. The blasts could contain as much as 8,000 pounds of high explosives annually and scores of toxic and radioactive materials, including up to 20 mg (200 curies) of tritium and up to 5,000 pounds of Uranium-238 (depleted uranium). If allowed to enter the body, depleted uranium has the potential for both chemical and radiological toxicity, and the two important target organs are the kidneys and the lungs. Tritium is known to cause a wide range of health problems, from birth defects to cancers. The open-air explosives testing to

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be performed under the permit will aerosolize these and other hazardous materials, which will then spread with the prevailing winds throughout the San Francisco Bay Area and Central Valley of California. Along with these comments, Tri-Valley CAREs is formally submitting the comments of nearly 450 individuals who are opposed to such testing at Site 300. Please consider each comment individually.

One may wonder why Livermore Lab is seeking an air permit to perform increased open-air detonations at the same time as NNSA is proposing to cease such testing at Site 300 in 2009 under the Complex Transformation plan. The answer is likely that Livermore Lab is planning on performing further experiments at Site 300 on a "work for others" basis for other federal agencies. This is unacceptable. All open-air explosives testing and related experiments should cease at Site 300, which should then be closed to these types of activities.

1|14.O.4 (cont)

In the draft Complex Transformation SPEIS, NNSA must consider an alternative that specifically involves the closure of Site 300 and/or transition to other environmentally-benign activities. According to the Council on Environmental Quality's (CEQ) regulations implementing the National Environmental Policy Act (NEPA), the section discussing alternatives "is the heart of the environmental impact statement." 40 C.F.R. § 1502.14. Pursuant to CEQ's NEPA regulations, agencies are required to "[r]igorously explore and objectively evaluate all reasonable alternatives." *Id.* at § 1502.14(a). The closure of Site 300 is a reasonable alternative, which should be thoroughly analyzed in the draft Complex Transformation SPEIS.

Furthermore, even assuming Site 300 is merely transferred instead of closed, that is a connected action that must be analyzed in the draft Complex Transformation SPEIS. Under CEQ's regulations implementing NEPA, connected actions are those that "are closely related and therefore should be discussed in the same impact statement. Actions are connected if they . . . [c]annot or will not proceed unless other actions are taken previously or simultaneously." *Id.* at § 1508.25. In this case, any environmental impacts associated with the transfer of Site 300 should be analyzed in the draft Complex Transformation SPEIS, since that transfer could not proceed unless NNSA undertakes its planned status change for Site 300 as part the Complex Transformation plan.

Moreover, the cumulative impacts of future activities at Site 300 must be analyzed in the draft Complex Transformation SPEIS. Pursuant to CEQ's NEPA regulations, "'Cumulative impact' is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions." *Id.* at § 1508.7. Since Livermore Lab officials have publicly stated that experiments for other federal agencies will continue at Site 300 in any event, such actions are clearly foreseeable. As such, the environmental impacts of these activities, whether conducted by the Departments of Defense or Homeland Security, should be analyzed in the draft Complex Transformation SPEIS.

In conclusion, all open-air explosives testing at Site 300 should cease. Whether this testing is done by DOE or another government agency, the risk to the community is the same. Central Valley residents, and in particular those from the fast-growing community of Tracy, should not have their health endangered by these activities. As acknowledged in the draft

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2|10.C Complex Transformation SPEIS, Site 300 is a redundant facility inappropriately located for such hazardous activities. Therefore, all high explosives and bomb testing at Site 300 should cease and future efforts should be focused on remediating its toxic legacy, as reflected by its status as a Superfund site.

Thank you for your consideration.

Sincerely,

Marylia Kelley
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Livermore, CA 94551
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Enclosures

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San Joaquin Valley Unified
Air Pollution Control District
4800 Enterprise Way
Modesto, CA 95365-8718
(209) 557-6400
Fax: (209) 557-6475

Senator Barbara Boxer
501 I Street, Suite 7-600
Sacramento, CA 95814
(916) 448-2787
Fax: (916) 448-2563

Senator Dianne Feinstein
One Post Street, Suite 2450
San Francisco, CA 94104
(415) 393-0707
Fax: (415) 393-0710

Congressman Jerry McNerney
2222 Grand Canal Blvd. #7
Stockton, CA 95207
(209) 476-8552
Fax: (209) 476-8587

City Council of Tracy
325 East 10th Street
Tracy, CA 95376
(209) 831-4103
Fax: (209) 831-4110

STOP Livermore Lab's Planned Open-Air Bomb Testing at Site 300 Using Radioactive and Toxic Materials

Hydrodynamic (bomb-core) test on firing table at Site 300, 1994. Note size of building on left in comparison to blast. These tests are ongoing at Site 300. Debris from these tests are among the contaminants that need to be remediated under the Superfund cleanup. Photo: LLNL

I write to you to oppose Livermore Lab's application to increase open-air bomb detonations at Site 300, the Lab's high explosives testing range near Tracy, California. The population of the City of Tracy and surrounding areas is on the rise. In fact, 5,500 homes are slated to be built to within a mile of the Site 300 boundary. The days when Site 300 was a "remote" location are long over. There are now roughly seven million people within a 50-mile radius of this facility.

The blasts will contain up to 8,000 pounds of high explosives annually and scores of toxic and radioactive materials such as Uranium-238 and tritium, the radioactive hydrogen in an H-bomb. These deadly materials will be detonated on outdoor "firing tables." Livermore Lab is asking to be allowed to detonate up to 5,000 pounds of Uranium-238 (also called depleted uranium or DU) per year in its bomb blasts. DU is a toxic, radioactive metal that is hazardous to human health. These tests will release 60 additional hazardous and radioactive materials into the air, including tritium (radioactive hydrogen), Thallium, Vinyl Chloride and Hydrogen Cyanide. The blasts will aerosolize these materials and spread them in the wind. Radioactive and toxic materials should NOT be exploded in open-air tests at Site 300.

I urge you to act to protect our community and halt all increased bomb testing at Site 300. The time to act is now. Site 300 is a redundant facility within the Department of Energy nuclear weapons complex. It's use as an open-air explosives testing site should be phased out, not expanded.

Check the box for campaign update

Sincerely,

Name & Email: Ruth Chippendale

Street Address/City/State/Zip: 2241 Santa Ana St Palo Alto, CA 94303

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PC-1540

Tri-Valley CAREs
Communities Against a Radioactive Environment
2582 Old First Street, Livermore, CA 94551 • (925) 443-7148 • Fax (925) 443-0177

Peace Justice Environment since 1983

May 2, 2008

Public Comment and Analysis
Part Two: The Impacts of "Complex Transformation" on Livermore Lab and Surrounding Communities

Submitted to

The U.S. Department of Energy,
National Nuclear Security Administration

Submitted as comment for

Draft Complex Transformation
Supplemental Programmatic Environmental Impact Statement
DOE/EIS-0236-S4
(also known as the "Bombplex" plan)

Submitted by

Tri-Valley CAREs
Marylia Kelley, Executive Director
Robert Schwartz, Staff Attorney
Jedidjah de Vries, Outreach Director

Tri-Valley CAREs' "Part Two" comment document is structured as follows:

1. Tritium Research and Development at Livermore Lab
2. Bomb Blasts (Hydrodynamic Testing) at Livermore Lab's Site 300
3. Plutonium, Highly Enriched Uranium and Livermore Lab
4. Reliable Replacement Warhead / National Ignition Facility and Other Connections to "Complex Transformation" Outlined in the Livermore Lab 10 Year Site Plan
5. Safety, Security, Terrorism and Livermore Lab
6. Alternatives Analysis and the Future of Livermore Lab
7. Conclusion

NOTE: Tri-Valley CAREs' "Part One" comment contains the complex-wide impacts of the "Bombplex" plan, and was submitted separately on April 30, 2008.

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PART TWO: IMPACTS ON LIVERMORE LAB AND SURROUNDING COMMUNITIES

1. Under the Preferred Alternative (and Other Alternatives) in the Draft Complex Transformation SPEIS, Tritium Research and Development at Livermore Lab is not Consolidated, is not Properly Analyzed, is Slated to Increase Over Current Programmatic Use, and Will Harm the Public

Tritium is a radioactive form of hydrogen that is used to boost the explosive power of modern nuclear weapons. Tritium is difficult to contain, is not captured by HEPA filters, is only partially captured by other mechanisms, diffuses through almost anything, and will, operating histories show, invariably escape when used under high pressures. Once released, tritium can travel with the wind, can "rain out" easily on surrounding populations and can become organically bound in the food chain.

At the Lawrence Livermore National Laboratory (LLNL or Livermore Lab), tritium has been released to the air, soil and groundwater. Known tritium releases to the air from Livermore Lab total between 800,000 and one million curies. One curie is a large amount of radiation, equal to 37 billion radioactive disintigrations per second.

At the Livermore Lab main site, tritium has been measured in rainwater at a concentration of 147,000 picocuries per liter, more than 7 times the state and federal maximum contaminant limit (MCL) for water. The groundwater has been found to contain tritium above the MCL at both the Livermore Lab main site and its Site 300 high explosives testing range. At Site 300, the concentration of tritium in the groundwater has been measured at 2 million picocuries per liter, 100 times the MCL.

Livermore valley wines taken off the shelf and analyzed by Livermore Lab have been found to have nearly four times the tritium of other California wines. Local honey and other agricultural products have also been found to contain elevated levels of tritium. The milk of local cows has also been found to contain excess tritium.

Historically, and up to the present, the concentration of tritium in local agricultural products closely mirrors the amount of tritium activity that goes on at Livermore Lab. Years where tritium programs have increased -- so, too, the environmental burden of tritium increases. And, when tritium activity goes down at Livermore Lab, tritium concentrations in wine, honey and the environment decrease.

A sampling of annual tritium releases to the environment as reported by LLNL shows the following:

1986	1,128 curies
1987	2,634 curies
1988	3,978 curies
1989	2,949 curies
1990	1,283 curies

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1991	>1,000 curies
1992	177 curies
1993	137 curies
1994	137 curies

In 1990, in part due to concerns voiced by Tri-Valley CAREs regarding LLNL's tritium contamination, Livermore Lab realigned and substantially reduced its tritium use and inventory. In 1991, LLNL stopped filling the test bomb components with tritium on site. In 1992, the Nuclear Testing Moratorium Act terminated full-scale nuclear testing altogether. Tritium activities at LLNL declined -- and so did the releases. There is a direct correlation between the decreases in tritium activity and the amounts released to the environment. The downward trend of tritium releases represents a move in the right direction for LLNL. This downward trend will be reversed by the tritium Research and Development (R & D) activities under the preferred alternative in the draft SPEIS.

Because the SPEIS specifically exempts the tritium R & D activities at LLNL from consolidation -- or from termination or reduction – the document must contain the LLNL history of releases, information about how much tritium is in the local environment, and provide an analysis of how DOE NNSA proposes to ensure that releases do not occur in the future. Again, it is our analysis, based on our study of tritium use at LLNL and other sites, that increased activity will lead to increased levels of tritium in the environment. Tritium exposure is associated with a wide range of negative health outcomes, from cancers to increased susceptibility to suppressed immune system diseases to miscarriage and birth defects, among others.

The accidental releases documented at LLNL have been the result of not one but many factors, ranging from equipment failure to employee error. There is nothing to suggest that increases in tritium use at LLNL will not result in similar future accidents.

In 1965 and 1973, about 650,000 curies of tritium were released through the stacks of the tritium facility (Building 331) at LLNL. In 1991, a DOE Report of the Task Group on Operation of DOE Tritium Facilities listed the following accidents occurring between 1986 and 1991:

125 curies, released 12/15/86 due to a failed pump and cryogenic vessel breach
198 curies, released 4/14/87 due to an equipment failure and operator error
145 curies, released 1/19/88 unknown cause or stack monitor malfunction
138 curies, released 1/25/88 unknown cause or stack monitor malfunction
653 curies, released 5/15/88 due to unexpected presence of tritium in gases being vented
120 curies, released 8/1/88 unknown cause or stack monitor malfunction
112 curies, released 2/28/89 unknown cause or stack monitor malfunction
329 curies, released 8/22/89 due to improper pressure relief of container
112 curies, released 10/31/89 due to mistaken belief a palladium bed contained only deuterium and (non-radioactive) hydrogen
144 curies, released 4/2/91 due to improper preparation of a reservoir

The DOE task force further states that management failures at LLNL were the direct cause of the accidental release of tritium on 4/2/91 and the resultant radiological exposure of facility personnel.

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In addition to airborne releases, the SPEIS should also discuss the tritium in waste at LLNL and in releases to the sewage, soil, surface and (eventually) groundwater.

The draft SPEIS mentions but does not analyze the impacts associated with the manufacture and filling of tritium targets for the National Ignition facility mega-laser on site at the LLNL main site. This activity is likely to increase airborne tritium emissions, tritium-contaminated wastes and other environmental and health impacts of tritium at Livermore Lab and in the surrounding communities. According to the Livermore Lab 10 Year Site Plan (quoted in section 4, below) the National Ignition Facility is an "integral part" of the Complex Transformation plan. As such, it must be analyzed both with regard to programmatic alternatives and environmental and other impacts associated with the use of tritium and other elements.

Moreover, the draft SPEIS fails utterly to consider that the tritium R & D activities in the preferred alternative are driving a major expansion of the tritium facility at Livermore Lab under the Tritium Facility Modernization Project. This project includes:

- nearly doubling the size of the tritium facility (Building 331) by adding a new building of approximately 6,000 square feet to the existing tritium facility,
- renovating existing labs in the tritium facility,
- modifying labs to accommodate new and larger devices,
- introducing new activities into the tritium facility, including the manufacture of fission-fusion targets using plutonium,
- and more.

Further, according to other DOE documents, the tritium handling is slated to increase from the usage of about 3.5 to 5 grams per year to 30 grams per year "at risk" in one room beginning in 2009, after the Complex Transformation SPEIS ROD. The allowable overall inventory would be 35 grams.

There are approximately 9,800 curies per gram of tritium. Therefore, the "at risk" limit of 30 grams all available in use at one time in one room/operation is 294,000 curies. This is enough tritium to nearly equal the historically high accident levels at LLNL of the 300,000 curie and 350,000 curie tritium releases in 1965 and 1973.

According to Dr. John Gofman, the founder of LLNL's bio-medical division, those tritium releases were responsible for 120 cancers and 60 cancer deaths. The "preferred alternative" of giving LLNL a special "pass" and NOT consolidating the tritium out of LLNL carries a potentially severe impact.

Another way to look at what these amounts of tritium mean is to look at the number of disintigrations per second represented by this tritium. One curie, as noted, equals 37 billion radioactive disintigrations per second. If the 30 gram at risk limit is released, that represents 294,000 curies times 37 billion disintigrations per second – or more radioactive disintigrations per second than there are stars in the Milky Way galaxy.

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The draft SPEIS dismisses this tritium at LLNL as a "small quantity." If this is indeed the DOE's basis for not analyzing the potential impact on LLNL workers and the public, it is an improper one.

The LLNL facility is unique in the weapons complex because it is a geographically small and crowded site – the main site where the tritium facility is located is only 1.3 square miles. Moreover, homes and apartment buildings are build right up to the site boundary. A number of Tri-Valley CAREs members can see the stacks of the tritium facility from their homes and yards. The tritium facility is likewise visible when driving down Vasco Road and other major streets. The impact of an accident (or other release scenarios including earthquake or terrorism attack) with tritium were not considered in the draft SPEIS and must be.

Sandia, Livermore sits directly to the south of Livermore Lab. Because of the proximity of the encroaching population center toward Sandia and Livermore Labs, all tritium activities at Sandia, Livermore have been phased out. Tri-Valley CAREs advocates for a phase out of all tritium activity at Livermore Lab. This is a viable option that should be analyzed in the PEIS.

2. Impacts of Ongoing and Increased Hydrodynamic Tests at Livermore Lab Site 300 Were Improperly Excluded from the Draft SPEIS.

As part of the preferred alternative under the Complex Transformation plan, the Department of Energy National Nuclear Security Administration (NNSA) proposes to cease open-air hydrodynamic testing at Site 300 in 2009 and conduct future open-air hydrotesting at the Nevada Test Site. Livermore Lab's hydrotesting facilities would then be consolidated in-place. According to the draft SPEIS, the Contained Firing Facility (CFF) would be closed in 2015, which could enable transfer or closure of Site 300. However, according to LLNL officials, even if hydrotesting by NNSA at Site 300 ends, experiments will continue there by other agencies, including the Department of Defense and the Department of Homeland Security. In fact, Livermore Lab spokeswoman Susan Houghton has stated, "It's going to be an industrial site no matter what."

Currently, Livermore Lab is in the process of seeking an air permit from the San Joaquin Valley Air Pollution Control District. This permit, which represents an eight-fold increase over current levels, would allow the outdoor testing of explosives at Site 300, which is located just 6.5 miles from downtown Tracy, California and approximately one mile from the proposed 5,500-home Tracy Hills development site. The blasts could contain as much as 8,000 pounds of high explosives annually and scores of toxic and radioactive materials, including up to 20 mg (200 curies) of tritium and up to 5,000 pounds of Uranium-238 (depleted uranium).

If allowed to enter the body, depleted uranium has the potential for both chemical and radiological toxicity, and the two important target organs are the kidneys and the lungs. Tritium is known to cause a wide range of health problems, from birth defects to cancers. The open-air explosives testing to be performed under the permit will aerosolize these and other hazardous materials, which will then spread with the prevailing winds throughout the San Francisco Bay Area and Central Valley of California. *(See also comments of nearly 450 area residents, submitted separately by Tri-Valley CAREs).*

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One may wonder why Livermore Lab is seeking an air permit to perform increased open-air detonations at the same time as NNSA is proposing to cease such testing at Site 300 in 2009 under the Complex Transformation plan. The answer is likely that Livermore Lab is planning on performing further experiments at Site 300 on a "work for others" basis for other federal agencies. This is unacceptable. All open-air explosives testing and related experiments should cease at Site 300, which should then be closed to these types of activities.

In the draft Complex Transformation SPEIS, NNSA must consider an alternative that specifically involves the closure of Site 300 and/or transition to other environmentally-benign activities. According to the Council on Environmental Quality's (CEQ) regulations implementing the National Environmental Policy Act (NEPA), the section discussing alternatives "is the heart of the environmental impact statement." 40 C.F.R. § 1502.14. Pursuant to CEQ's NEPA regulations, agencies are required to "[r]igorously explore and objectively evaluate all reasonable alternatives." *Id.* at § 1502.14(a). The closure of Site 300 is a reasonable alternative, which should be thoroughly analyzed in the draft Complex Transformation SPEIS.

Further, even assuming Site 300 is merely transferred instead of closed, that is a connected action that must be analyzed in the draft Complex Transformation SPEIS. Under CEQ's regulations implementing NEPA, connected actions are those that "are closely related and therefore should be discussed in the same impact statement. Actions are connected if they . . . [c]annot or will not proceed unless other actions are taken previously or simultaneously." *Id.* at § 1508.25. In this case, any environmental impacts associated with the transfer of Site 300 should be analyzed in the draft Complex Transformation SPEIS, since that transfer could not proceed unless NNSA undertakes its planned status change for Site 300 as part the Complex Transformation plan.

Moreover, the cumulative impacts of future activities at Site 300 must be analyzed in the draft Complex Transformation SPEIS. Pursuant to CEQ's NEPA regulations, "'Cumulative impact' is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions." *Id.* at § 1508.7.

Since Livermore Lab officials have publicly stated that experiments for other federal agencies will continue at Site 300 in any event, such actions are clearly foreseeable. As such, the environmental impacts of these activities, whether conducted by the Departments of Defense or Homeland Security, should be analyzed in the draft Complex Transformation SPEIS.

In conclusion, all open-air explosives testing at Site 300 should cease. Whether this testing is done by DOE or another government agency, the risk to the community is the same. Central Valley residents, and in particular those from the fast-growing community of Tracy, should not have their health endangered by these activities. As acknowledged in the draft Complex Transformation SPEIS, Site 300 is a redundant facility inappropriately located for such hazardous activities. Therefore, all high explosives and bomb testing at Site 300 should cease and future efforts should focus on remediating its toxic legacy, as reflected by its status as a Superfund (CERCLA) site.

3. Consolidation of Plutonium and Highly Enriched Uranium out of Livermore Lab Needs Better Analysis – and Faster Action -- Due to the Encroaching Community and Other Unique Risks of Keeping Special Nuclear Material at This Location.

The plutonium and highly enriched uranium at Livermore Lab are vulnerable to a terrorist attack, a disgruntled employee scenario and to release in the event of a major earthquake, as well as other scenarios.

The draft SPEIS proposes to leave weapons usable quantities of plutonium in place at Livermore Lab until 2012. Further, the "preferred alternative" involves moving the plutonium from Livermore twice -- once to the Nevada Test Site and then again to the Los Alamos Lab in NM, presumably for use in the new plutonium pit manufacturing facility that is the "preferred alternative" in the SPEIS.

Tri-Valley CAREs requests that a far different option be analyzed. First, there is no need for new pit production facilities/capabilities at the Los Alamos Lab with the capacity of producing 80 pits a year (nor is the CMRR facility, let alone its potential 9,000 square foot expansion, fully justified or analyzed in the SPEIS). Second, the plutonium from Livermore Lab should be moved only once – and for safe and secure storage, not new bomb experiments. We suggest the following process:

First, undertake a study of potential storage sites. It need not take long. This study should not be limited to sites that are part of the Complex Transformation plan. For, if the plutonium from Livermore Lab were to be simply stored safely and securely at a remote location, that plutonium would not have a role in Complex Transformation. (It is possible that if the decision regarding moving the LLNL plutonium were made on the grounds of safety and security, a different storage site choice might emerge. For example, the DOE has excess underground secure storage at a large site that is not an NNSA site analyzed in the SPEIS. Too, the DoD may have excess secure storage facilities suitable for the job.)

This is an important point because, with the present plan, the tail of new nukes is wagging the dog of Livermore's plutonium. As noted, an unbiased analysis might show that the safest and most secure location for Livermore's plutonium is at a site that is not one of the eight involved in Complex Transfomation. Or, perhaps one of the eight is the best site (though it most certainly won't be Los Alamos -- the place the "preferred alternative" now proposes to send it). Point is, start with the analysis. We offered this comment at scoping, but unfortunately it was ignored in the preparation of the draft SPEIS.

Second, make the study of potential storage sites as transparent as possible. Bring in independent analysts, community members, affected tribes and other stakeholders.

Third, (and this can begin today) lay out a plan to safely package the plutonium at Livermore Lab. The Defense Nuclear Safety Board has cited Livermore Lab's plutonium facility for storing plutonium in paint cans and food tins. And, this is only the tip of the iceberg. Good procedures,

and a reasonable allocation of time and money will be required to package the plutonium for shipment.

Fourth, ship it to the selected location in as safe and timely manner as is possible. Allocate sufficient funds to ensure that it is stored safely and securely at the new site. Continue to involve independent analysts, communities, affected tribes and other stakeholders.

Similarly, the highly enriched uranium should be moved from Livermore Lab in a prompt manner. And, the material should be stored as safely as possible at the most secure location. The DOE should undertake a process similar to the one outlined above to determine the best location. And, the highly enriched uranium should be stored only, and not be used in bombs or in nuclear weapons experiments.

The SPEIS proposes to keep highly enriched uranium and plutonium at Livermore Lab at least for the next 5 years, yet it fails to consider the Livermore Lab's environmental record of accidents, spills, leaks etc. with these materials. There have been numerous fires and other accidents involving uranium at Livermore Lab. Below are just a few of the accidents and other problems at Livermore Lab involving plutonium.

Some Plutonium Mishaps at Livermore Lab: Over the years, there have been a number of accidents and oversights at Lawrence Livermore National Laboratory involving plutonium. The following is but a small sampling of such incidents:

- 1953-1962: Radioactive liquid wastes, including plutonium, are disposed of in unlined pits
- 1958: Livermore Water Reclamation Plant (LWRP) begins to distribute sludge to the public
- 9/13/1965: A fire involving about 100 grams of plutonium starts in Building 332
- 4/20/1967: A spill of radioactive liquid containing plutonium occurs in a storage area outside Building 332
- 5/25/67-6/15/67: Release of plutonium to the City of Livermore's sewer system contaminates sludge distributed by LWRP
- 1973: Unknown quantities of plutonium released to soil during transfer of solid materials from solar evaporators; LWRP stops distributing sludge to the public
- 4/16/1980: Flash fire in a glovebox allows plutonium to escape
- 3/1983: Routine handling of drums containing curium, americium, and plutonium results in a spill and the contamination of at least one worker
- 5/1987: Another release of plutonium to the City of Livermore's sewer system
- 1990: DOE testing finds elevated levels of plutonium in an off-site air monitor east of LLNL
- 7/9/1991: Monitoring indicates statistically significant increase in plutonium discharge to sewer system
- 10/24/1991: Torn bag results in plutonium powder being spread on the floor
- 10/29/1992: Two LLNL workers are contaminated after a can of plutonium oxide is placed in a bag
- 1994: EPA discovers plutonium above background levels in three city parks. The highest level occurs in Big Trees Park, a half-mile west of LLNL.

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- 1995: Deficiencies in safety practices lead to the shut down of all plutonium experiments and machining operations for 6 months
- 2/7/1996: Department of Energy reports that LLNL cannot account for 12 pounds of plutonium in its stockpile
- 2/2/1997: A worker at LLNL accidentally sticks himself with plutonium-contaminated metal
- 10/3/2003: A dozen LLNL workers are exposed to plutonium after a power outage caused the radioactive element to leak from its specially designed container
- 2004: Five workers at LLNL inhale plutonium particles while packaging radioactive waste
- 3/2005: Defense Nuclear Facilities Safety Board cites LLNL for storing plutonium in paint cans and food tins.

Plutonium represents a serious health hazard. A person is most likely to be exposed to plutonium by breathing it in. Other exposure pathways are also possible. Plutonium may remain in the lungs or move to the bones, liver, or other body organs. It generally stays in the body for decades and continues to expose the surrounding tissues to radiation, which may increase your chance of developing cancer and other health problems. The health effects of plutonium have been studied primarily by experiments done on laboratory animals. These studies have shown lung diseases from short-term exposure to high concentrations of plutonium. Animal studies have also reported an increase in lung, liver, and bone cancers from exposure to plutonium, as well as effects on the immune system.

In light of this, problems with the LLNL plutonium facility are relevant and must be examined in the SPEIS. The primary plutonium building was first built in 1961, and the latest major addition was built in 1977. Safety vulnerabilities such as the ventilation system and electrical system must be considered carefully.

Safety Features / Accident Response: According to a report issued by the Defense Nuclear Facilities Safety Board (DNFSB), the accident analysis and bases for calculating consequences used in the Draft SWEIS may be deficient. In a March 17, 2004 report, the DNFSB wrote that staff had reviewed LLNL's accident modeling and found its key assumptions highly questionable.

The DNFSB determined that more radiation was likely to escape from the LLNL plutonium facility in an accident than was calculated by the model. Page 3 of the DNFSB report states that the LLNL calculation of only 5% leakage (Leak Path Factor) of the radiation from a plutonium fire is "unrealistic and probably underestimates the extent of a release of unfiltered radioactive material from the facility."

The SPEIS does not discuss the environmental impacts of plutonium in Livermore at all – and must. In this context, we ask if DOE is still using the old 5% leak path factor?

We would also like the SPEIS to describe how integral Livermore Lab reliance on air monitors / emergency generators and negative airflow is. In this context, the SPEIS should include information about the October 2003 plutonium accident that resulted in a dozen lab employees potentially being exposed to airborne plutonium because glovebox seals, an emergency generator, an alarm system and negative airflow system all failed simultaneously. A case study should be in-

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cluded in the SWEIS describing how all of these things could have failed at once and describing how these types of failures will not happen again. (See also the partial list of accidents above).

Plutonium has been removed from soils at the Livermore Lab main site as part of the ongoing Superfund cleanup there. Plutonium has also been found at elevated levels in an off-site air monitor to the east of LLNL and in the top 2 inches of dirt in a City park to the west of LLNL. The impacts of continuing operations, including those that are part of the "preferred alternative" of the SPEIS at Livermore Lab includes risks that were not studied in the SPEIS and must be.

In addition to failing to consider the environmental and health risks of keeping this material at LLNL and the security risks (discussed in Part One and below), the SPEIS also fails to consider that its decision to name LLNL as a nuclear weapons design center of excellence for the future may involve LLNL operating a new plutonium foundry (currently under construction at LLNL).

The new plutonium foundry is intended to:
(a) prototype plutonium pits and develop new plutonium pit manufacturing techniques that would be used full-scale at Los Alamos Lab in the new pit manufacturing facilities under the SPEIS' "preferred alternative," and,
(b) in a related activity, help develop and prototype a new plutonium pit for the Reliable Replacement Warhead that LLNL is presently developing.

The new foundry, called L-cast, which is being built in the Livermore Lab plutonium facility (Building 332), is inextricably connected to the Complex Transformation plan, yet it is strangely absent from the draft SPEIS. It must be analyzed, including:

- Its potential health and environmental impacts,
- Its potential security impacts and vulnerabilities,
- Its potential to affect or defer the SPEIS "preferred alternative" to remove plutonium from LLNL by 2012 as well as its impact on any plans to accelerate the removal date, and
- Its constraining impact (along with the RRW program of which it a part) on the development of a consolidation alternative that would result in Livermore Lab's re-missioning.

4. Role of the Reliable Replacement Warhead and Continuing Nuclear Weapons Development at Livermore Lab as Part of Complex Transformation (e.g., as Outlined in the Livermore Lab 10 Year Site Plan) Must be Fully Transparent and Considered in the SPEIS

The Ten Year Site Plan for Livermore Lab (dated March 2007) contains the following references to the Complex Transformation plan:

- 10 Year Plan, Lab director George H. Miller's' statement (page i): "The Lawrence Livermore National Laboratory is an important part of that vision as a nuclear design resource and a center for innovative science and technology to help expedite the transformation… Success in the development of RRWs [Reliable Replacement Warheads] is essential to making the transformational changes envisioned…"

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• 10 Year Site Plan, page 3-2, "Livermore plays a prominent role… develop[ing] replacement warheads that will enable the Complex 2030 [Complex Transformation] transformation."

• 10 Year Site Plan, page 3-13, "NNSA's Complex 2030 [Complex Transformation] plan… calls for the significant changes to the nuclear weapons complex, and a modified mission that includes development, production and deployment of the Reliable Replacement Warhead (RRW) designs to replace major portions of the current stockpile…"

Tri-Valley CAREs' analysis of the draft SPEIS is that the "preferred alternative" for revitalizing and rebuilding the nuclear weapons complex is tied to the desire of DOE NNSA to continue the RRW program.

In essence, RRWs are the "enabler" for Complex Transformation as CT is a plan for the future of the nuclear weapons complex whose taproot is RRW -- and at the same time it would also be fair to say that Complex Transformation is likewise the "enabler" for RRWs as production would occur in refurbished nuclear weapons complex facilities and use the pits that are part of the 50/80 "preferred alternative" under Complex Transformation.

Perhaps a simpler way to put it is that RRW and Complex Transformation are inextricably linked. Yet, the SPEIS is opaque on this relationship, does not analyze it adequately, does not examine the associated environmental impacts and does not consider the constraining effect that enabling the RRW program has on the Department's own thinking (or lack thereof) regarding reasonable alternatives to the preferred plan.

Moreover, by keeping these relationships opaque, the SPEIS fails to adequately analyze the totality of environmental impacts associated with the RRW program. For example, Livermore Lab was chosen to develop the first RRW design. If that goes forward (and DOE NNSA is pushing Congress to get it funded in 2009 even after Congress cut it last year), what are the impacts on LLNL and the surrounding communities?

• 10 Year Plan, Page 1-3 and repeated on Page 4-5, "The establishment of NIF [National Ignition Facility] as a user facility, integrated with the available computational modeling capabilities and consolidation of the user community into a campus around the facility are an integral part of the LLNL Complex 2030 [Complex Transformation] vision."

• 10 Year Plan, page 1-4, "In support of the Complex 2030 [Complex Transformation] strategies, LLNL is improving its F&I [facilities and infrastructure], including:

- Steady progress is being made on deferred maintenance reduction.
- Sufficient F&I maintenance funding is committed (at the minimum 2% of replacement plant value) to assure the sustainment after FIRP ends.
- The Terascale Simulation Facility (TSF) is operating as a productive user facility for the three NNSA laboratories.
- The NIF is undergoing transformation to a national shared user facility..."

Why were these "integral parts" including NIF, the Tritium Facility Modernization Project that is "needed" for NIF, and the supercomputing complex referred to in the quotes not analyzed in

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the SPEIS. Was a deal cut between DOE NNSA Headquarters and LLNL management for certain nuclear weapon design facilities and programs to be "exempted" from consolidation or closure in order to appease one of the parties? It looks that way. Further, this inappropriately constrains the alternatives analysis.

• 10 Year Site Plan, page 1-5, "This year's TYSP [10 Year Site Plan] follows the framework of the Complex 2030 [Complex Transformation] vision… One tangible initiative is the line item proposal to consolidate target fabrication capabilities and associated personnel into a Target Fabrication Facility. This transformation accommodates user facilities and meets one of the important goals of the 2030 [Transformation] vision. In addition… "

Tri-Valley CAREs notes that the SPEIS describes neither a "Target Fabrication Facility" at LLNL nor the aforementioned Tritium Facility Modernization Project. What is the relationship between the facilities? To the Complex Transformation plan? Why are these relationships absent from the SPEIS?

Above are examples of the naming of Complex 2030 [Complex Transformation] in the LLNL 10 Year Site Plan, March 2007. Please reconcile the relationships outlined in that document with the lack of consideration of these facilities and programs in the SPEIS itself. And, in that context, we repeat that it appears as if promises about the outcome of the process have been made in advance of the final document and ROD.

We also request that DOE NNSA consider and include in the SPEIS any relevant information from the 2008 LLNL Site Plan (which Tri-Valley CAREs is attempting to obtain).

5. Safety and Security Vulnerabilities and the Threat / Consequences of Terrorism at Livermore Lab.

As we note in our Part One comment, Livermore Lab has been granted a "variance" from DOE NNSA and need not demonstrate compliance with the DOE's 2005 Design Basis Threat (meaning there is no assurance that LLNL has adequate defenses against a terrorist attack).

We also noted a significant discrepancy in the SPEIS; LLNL is listed in the Executive Summary as among the facilities whose security and vulnerability to terrorism is considered in a classified appendix to the SPEIS. Yet LLNL is missing in the body of the document (page B-18) when it likewise listed facilities whose security vulnerabilities were considered in the same classified appendix.

We refer the reader to our Part One comment for details, but note that either a severe earthquake or terrorist attack could have a catastrophic impact on the nearly 10,000 Livermore Lab employees, Sandia, Livermore's approximately 1,000 employees, the 81,000 people who live in Livermore and the 7 million people who live within 50 miles of Livermore Lab.

The administrative limit for plutonium at Livermore Lab is more than 3,000 pounds, enough for about 300 nuclear bombs. The administrative limit for highly enriched uranium is hundreds of pounds. The administrative limit for tritium is 35 grams. The Livermore Lab tritium facility

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(Building 331) and plutonium facility (Building 332) are "cheek to jowl" and vulnerable to a terrorist attack. As stated, the Complex Transformation plan leaves weapons usable quantities of plutonium and highly enriched uranium at Livermore Lab in place for the next 5 years. It fails to consolidate LLNL's tritium R & D and its preferred alternative supports an increase in programmatic activity with tritium at the Lab. These nuclear materials leave the people and the environment in this rapidly growing suburb at risk.

6. Alternatives Analysis and the Need to Rethink the Future of Livermore Lab.

Many of our members are residents of Livermore who would like to see the SPEIS include an exploration of alternative futures for the Livermore Lab, specifically a civilian science based alternative.

We note that Livermore Lab has great potential as a premier center for civilian research, for example in the area of modeling global climate change, research and development of non-polluting, renewable energy technologies and more. The current proposal would keep radioactive tritium at the Lab, and would continue use of Site 300 for open air bomb testing (albeit under the auspices of different federal agencies). Other futures are possible for the Livermore Lab and for this community and it is within the scope of DOE's authority and reasonable to expect that a NEPA review of the future of the nuclear weapons complex would examine an alternative future for Livermore Lab. We note that an alternative future for Livermore Lab goes hand in hand with the Curatorship alternative detailed in our Part One comment. It is not credible for DOE to stubbornly refuse to evaluate Curatorship for the complex and/or a post-Cold War, civilian science future for LLNL's mission and programs.

DOE should embrace its overarching mission to advance the national, economic, and energy security of the nation, instead of clinging to Cold War era nuclear weapons programs. A credible alternative future could be accomplished by "re-missioning" Livermore Lab. This would have benefits for the Lab, the community, the country, and the world. At a minimum, DOE's responsibility under NEPA is to evaluate such an alternative in its SPEIS.

Conclusion: Tri-Valley CAREs is a non-profit organization located in Livermore, California. Tri-Valley CAREs has been monitoring the activities of Lawrence Livermore National Laboratory and the nuclear weapons complex for 25 years. On behalf of our 5,600 members, many of whom are directly affected by the preferred alternative and other options in the Complex Transformation plan, we submit these comments on the DOE National Nuclear Security Administration Complex Transformation Supplemental Programmatic Environmental Impact Statement. We request that upon completion of the final SPEIS, DOE send Tri-Valley CAREs 2 complete copies, 10 additional Executive Summaries and 10 copies of the document on CD ROM. We thank you for this opportunity to comment.

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Tri-Valley CAREs Comment on Complex Transformation SPEIS Part Two / Page 13

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PC_1409

Levens, Matthew

From: June Forsyth Kenagy [nanajune@comcast.net]
Sent: Tuesday, April 29, 2008 11:53 PM
To: Complex2030
Subject: No new nukes!

June Forsyth Kenagy
5459 Davidson Street SE
Albany, OR 97322-8313

April 29, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A, 2|9B Please stop increasing nuclear production (no added plutonium pits!) and do not rebuild our nuclear arsenal. We already spend too much on our military, more than any other nation and more than several other nations put together! I personally want to see our tax dollars spent to help groups like the homeless shelter whose board my husband and I serve on. And help my grandkids go to college. And feed starving people around the world. If we aided justice worldwide and ended poverty and hunger, we wouldn't need nuclear weapons to fight "terror," most of which arises from deprivation and injustice. We spend too much on nuclear weapons as it is.

3|1J, 4|8A After all, how can we ask other nations to forgo nuclear ambitions while we increase our nuclear arsenal? That's so hypocritical! We need to put our money into social programs at home and into a Peace Department that will pursue diplomacy. Five past Secretarys of State have again urged this far-too-warlike administration to do. I'm proud of my Congress for their refusal to fund the Reliable Replacement Warhead and a huge bomb plant. This new proposal, termed CMRR, is equally foolhardy. Please defeat it.

Sincerely,

June Forsyth Kenagy
541-926-1922

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January 9, 2007

Joe Kennedy
Chairman
Margaret Armitage
Vice-Chairman
Madeline Esteves
Secretary/Treasurer
Pauline Esteves
Council Member
Margaret Cortez
Council Member

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation NA-10.1
U.S. Department of energy/NNSA
1000 Independence Avenue, SW
Washington, D.C. 20585

Re: Comments to the Draft Complex Transformation (SPEIS)

Dear Mr. Wyka:

The Timbisha Shoshone of the Western Shoshone Nation hereby submits the following comments concerning the Draft NNSA Complex Transformation SPEIS on Western Shoshone Lands also known as the Nevada Test Site (NTS). Please note that the Timbisha Shoshone has only recently been provided information on this project, we provide these comments in the absence of being able to fully analyze and address the issues addressed by the SPEIS documents. If we were afforded appropriate financial support, we would be able to participate fully, give comments to this project as an equal with the United States Government.

Procedural Comments:

1|2C
2|2A There were no opportunities for Timbisha participation, especially since there was no Government to Government relationship with the Timbisha Shoshone;

3|2E The comment period was inadequate relative to the size, scope and importance of the environmental impact;

2|2A (cont) There is inadequate time for the Department of Energy to consider the multitude of comments and issue a final SPEIS;

Timbisha Shoshone Tribe
785 N Main St Suite Q * Bishop, CA 93514 * Ph # (760) 873-9003 * Fax # (760) 873-9004
PO Box 206 * Death Valley, CA 92328-0206 * Ph # (760) 786-2374 * Fax # (760) 786-2376

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PROJECT COMMENTS

Proposed Action:

4|14H
5|14I
6|14K The Timbisha Shoshone of the Western Shoshone Nation is opposed to any proposed action(s) by any government or non-government party that will alter, destroy, negatively impact and/or reduce the ability to celebrate and or reaffirm its cultural heritage and or the cultural heritage of other indigenous peoples. The Timbisha Shoshone believes that the project, as currently contemplated, will negatively impact culture, including its religious practices, health, and economy.

7|2H
1|2C (cont) The Timbisha Shoshone believes that the United States Governments acquisition and dispensation of information concerning the Complex Transformation Project (SPEIS) has been woefully inadequate and does not satisfy the U.S. government's legal and regulatory obligation to obtain indigenous peoples perspectives concerning the SPEIS project and its potential impacts. We insist that the best and most meaningful means of communicating would be on a government-to-government basis.

4|14H (cont) The SPEIS study area and nearby lands have significant cultural importance to the indigenous peoples from this area. To indigenous peoples, which include the Southern Paiute and the Western Shoshone, these lands contain rich traditional religious, gathering and recreational areas that are life sustaining and lie at the core of indigenous life. In contrast, however, U.S. Department of Energy may view the proposed action lands as remote, low populated and barren, lifeless place, where a highly controversial project is proposed to take place. This contrasting perspectives lie at the core of the present controversy of the appropriateness of the Complex Transformation location and precisely why it is very important that before any proposed action move forward, that the indigenous peoples perspectives concerning the Complex Transformation site be fully evaluated, studied and documented. As of the date of these comments the studies that have been conducted fail to include the complete indigenous perspective and it is recommended that the DOE thoroughly assess and fully fund any and all research documenting indigenous people's perspectives and concerns with the SPEIS.

8|14H.2

9|11A
10|11D
1|2C (cont);
8|14H.2 (cont.)

2

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9|11A (cont)
4|14H (cont)

All further studies, including geological, hydrological, ethnological, archeological, meteorological and volcanological should be conducted focusing on the indigenous peoples point of view, which would assist the DOE to better understand the complex cultural perspectives of indigenous peoples. Likewise, scientific experts who have gained the trust of or who are highly familiar with indigenous peoples cultural perspectives, specifically, the perspectives and traditions of indigenous peoples, should be utilized, again, to better develop the indigenous perspective to the project and proposed land use.

Air Quality and Climate

11|14D
12|14O
11|14D (cont)
4|14H (cont)
6|14K (cont)

Any release of additional air pollutants are of great concern to the Western Shoshone and should not exceed the EPA National Ambient Air Quality Standards. Especially, since there have been over eight hundred highly powerful and explosive nuclear weapons detonated on Western Shoshone Lands now referred to as the Nevada Test Site. The SPEIS should include information concerning what affect, a release of nonradiological air pollutants will have within the surrounding area, specifically within traditional Native American religious, cultural and gathering areas. Studies should include what affects non radiological air pollutants may have on sensitive groups, such as elders and children.

Groundwater Resources

13|14E
14|14G
10|11D (cont)

The Complex Transformation has the potential to impact the water flow, specifically the Amargosa River, which is interrelated to the Ash Meadows alluvial aquifer. This information and the discussion of potential contamination is of great concern because it is near the Ash Meadows aquifer which is within the Timbisha Shoshone homelands situated in the heart of what is known as the Death Valley National Monument. The Timbisha Shoshone are concerned about any radiological or hazardous material contamination of available drinking waters at the site for members and the flora and fauna that drink these waters. Moreover, the Timbisha Shoshone are concerned about any migration of polluted waters to Devils Hole where rare and endangered pup fish are located. Therefore, the SPEIS is incomplete absent additional studies concerning impacts to both surface and ground waters, and potential contaminated water migration upon the Amaragosa Desert and Ash Meadows alluvia aquifers.

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Biological Resources

12|14O (cont)
15|14A
14|14G (cont)

The SPEIS fails to quantify the impacts to plants, game and fish ecosystems traditionally used by indigenous peoples. Indigenous people have a unique means of viewing the land and the biological resources it provides. This view includes the concept that indigenous peoples are "one" with the land and manage its resources with future generations in mind. Therefore, any SPEIS absent an assessment of traditional cultural ecosystem considerations is insufficient to base further action. Therefore, it is recommended that future environmental documents include an assessment of Indigenous peoples ecosystem perspectives and concerns. This again, is especially important as the SPEIS will impact cultural resources such as Bighorn sheep, Prong Horn, deer, reptiles and possibly fish. Moreover, clearly defining an indigenous ecosystem is critical to implementing an appropriate ecosystem management program.

Occupational Health and Safety Impacts (radiation exposure)

6|14K (cont)
4|14H (cont)
9|11A (cont);
8|14H.2

Although the SPEIS assumes that the exposure to radiation both by non-workers and workers will be low, the SPEIS is absent any information concerning indigenous peoples perspectives concerning their view of radiation in general and or what irradiation (exposure) to plants, game and minerels exposure means to them. For example, many indigenous cultures in the United States have faced weapons of mass destruction imposed upon them by the U.S. government and its extermination policies in the 19th century, eliminating ninety eight percent or more of the indigenous population in a short period of time. During the cold war era, it was common that fallout from atomic testing rained down upon the Western Shoshone peoples and non-indigenous people alike causing cancers and other health problems associated with atomic testing. Additionally, indigenous cultures also believe that they can not eat game, plants or use minerals in areas exposed to these powers. At this time of atomic testing, witnesses watched in horror as animals and birds alike dropped dead from exposure and those that did not die faced major health problems such as, boils, birth defect, hair loss, cancers and/or a slow and painful death. It will be impossible to perform religious, cultural or gathering activities in the areas of exposure if this project were to proceed. Additional studies concerning indigenous peoples perceptions concerning radiation are required to be conducted to acquire the complete perspective concerning occupational health and safety impacts.

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A. Emergency Response

16|14J
6|14K
(cont)
17|14N

An appropriate environmental justice analysis should also include a complete evaluation of indigenous peoples ability to respond to an emergency and/or any types of health effects that may be associated with these tests. This is especially significant because many of the indigenous peoples that may be potentially impacted by the SPEIS either have limited resources or lack of resources adequate to respond to an emergency. Upon identifying the communities' ability to appropriately respond and any response training or equipment needs, the DOE should adequately fund identified needs.

Additional Concerns:

16|14J
(cont)

The project impacts Indian peoples by diminishing the capacity for self-government from the deployment of limited human and technical resources from normal day-to-day affairs;

15|14A
(cont)

Potential reduction in Western Shoshone peoples use of land, plant and animals;
The potential disturbance and possible destruction of Western Shoshone cultural resources;

12|14O
(cont)

Potential Impacts to lands and economic development outside the radiological region, specifically to tourism in the Death Valley National Park area, which may impact the Timbisha Shoshone's ability to sustain economic development;

18|20.0

Potential impacts to the self-governance of the Timbisha Shoshone;

18|20.0
(cont)

Potential impacts to the Government-to-Government relationship between the Timbisha Shoshone and the federal government;

15|14A
(cont)

Potential impacts to lands held in trust near the proposed site;

13|14E
(cont)

Potential contamination of water resources from potential radiological release;

1|2C
(cont)

Potential impacts to fiscal resources for having to review end respond to DOE documents;

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Kennedy, Joe
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5|14I
(cont)

Potential impacts to sustainable economic development due to the stigma of nuclear fallout;

15|14A
(cont)

Potential impacts to the cultural relationship to lands that may be removed from use and access;

14|14G
(cont)

Potential damage to animal habitat from project;

6|14K
(cont)

Potential damage to the health and safety of members from possible exposure to radiation;

6|14K
(cont)

Potential contamination of traditional food sources;

Land Use and Ownership

18|20.0
(cont)

And finally, the main points of our opposition are based on: (1) title Issues, failure to provide promised responses and failure to address cultural resource damages and (2) environmental sustainability and lack of U.S. legal compliance. There is no valid extinguishment of title to this area and we have not given approval of this activity. On March 10, 2006 in Geneva Switzerland, an historic and strongly worded decision by the United Nations Committee for the Elimination of Racial Discrimination (CERD) and the United States was urged to "freeze", "desist" and "stop" actions being taken or threatened to be taken against the Western Shoshone Peoples of the Western Shoshone Nation, of which the Timbisha Shoshone are a part. In its decision, CERD stressed the "nature and urgency" of the Shoshone situation informing the U.S. that it goes "well beyond" the normal reporting process and warrants immediate attention under the Committee's Early Warning and Urgent Action Procedure (CERD decision attached).

Once again the title issue which cannot be ignored; the 1863 Treaty of Ruby Valley recognizes and follows a clear chain of title, excepting Western Shoshone lands out of the State of Nevada and claim of "federal" title.

The 1787 Northwest Ordinance (still in effect) states that: "The utmost good faith shall always be observed toward the Indians; their land and property shall never be taken from them without their consent."

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The 1834 Trade and Intercourse Act (still in effect) restricts authority to make land transactions with Indian Nations. Section 11 prohibits any person from making a settlement on any lands belonging, secured, or granted by treaty with the United States to any Indian tribe. " Section 12 provided that ' no purchase, grant lease, or other conveyance of lands, or If any title or claim thereto, from any Indian Nation or tribes of Indians, shall be of any validity in law or equity, unless the same is made by treaty or convention entered into pursuant to the Constitution."

The 1861 Nevada Territorial Act referred to in the 1787 Northwest Ordinance and stipulated that Indian lands "shall be accepted out of the boundaries, and constitute no part of the territory of Nevada."

Article 6 of the US Constitution confirms the authority of the Ruby Valley Treaty upon all entities of the United States: "This Constitution and the Law of the United States which shall be made in pursuance thereof; and all shall be the supreme Law of the Land; and the Judges in every state shall be bound thereby, anything in the Constitution or Laws of any state to the contrary notwithstanding." Clearly, the Treaty of Ruby Valley is such a document and appropriates Western Shoshone land.

INDIAN CLAIMS COMMISSION

18|20.0 (cont)

Final Report of the ICC tells us for a certainty that the Indian Claims Commission failed to fulfill the reporting requirement of Section 22(a) of the Indian Claims Commission Act in the Western Shoshone case. Section 22(a) of the ICC Act specified the two ingredients necessary for the Indian Claims Commission to reach "finality" in any given case. One ingredient was the Commission's report of its final determination and judgment to Congress. The second ingredient was payment to the Indians of the compensation owed to them. The United States Supreme Court in the 1985 ruling *U.S.* v. *Dann* failed to discover that the ICC had never been able to fulfill the first reporting ingredient of "finality" in the Western Shoshone case, thus resulting in an error of fact in the decision.

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The implications of this new finding are indeed profound. The United States government has relied on the ruling in *U.S.* v. *Dann* to contend that the Western Shoshone are barred from raising the question of Western Shoshone title because of the ruling in *U.S.* v. *Dann* that the Western Shoshone were paid when the U.S. government paid itself on their behalf. However, such "finality" could only be reached in the Western Shoshone case if the Indian Claims Commission actually did file its report with Congress in the Western Shoshone case, and if the Western Shoshone were paid.

Suppose for a moment that we were willing to agree with the Supreme Court in *U.S.* v. *Dann* (which we are not) that the Western Shoshone were paid when the U.S. Treasury placed monies into an account in the name of the Western Shoshone (as wards of the federal government). This would still leave the reporting requirement of Section 22(a) of the Indian Claims Commission Act unfulfilled. Because the Indian Claims Commission no longer exists, the reporting requirement of the ICC Act will forever remain unfulfilled by the Indian Claims Commission.

Any Western Shoshone monetary distribution bill must rest upon the statutory framework of the Indian Claims Commission Act. Pursuant to the ICC Act, any ICC monetary distribution bill must be premised upon the ICC having entirely completed its work to the point of "finality" as defined by Section 22(a) of the ICC Act. Because the Commission failed to do so in the Western Shoshone case, this means that there is not now and never will be a valid statutory basis for a Western Shoshone monetary distribution bill to be passed by Congress in accordance with the terms of the ICC Act.

The new finding outlined in this Report simply underlines the fact that negotiations will be the only way to resolve the impasse between the United States and the Western Shoshone Nation over disputed lands within the boundaries of the Treaty of Ruby Valley. An effort at negotiations was attempted during the Carter administration, but ultimately failed. Such negotiations must be immediately reopened in order for the United States and the Western Shoshone Nation to come terms with the Western Shoshone title and land rights.

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A key starting point of any negotiation between the United States and the Western Shoshone will be the recognition in 1978 by the Ninth Circuit Court of Appeals that, "the title issue in this case was neither actually litigated nor actually decided in the proceedings before the ICC." (*United States* v. *Dann*, 572 F. 2d 222, 226). The United States government has been avoiding good faith negotiations with the Western Shoshone people by arguing that "finality" has been reached in the Western Shoshone case. By revealing that the Indian Claims Commission did not reach "finality" in the Western Shoshone case, the Commission's 1979 "Final Report" also reveals that the Western Shoshone title question still remains an open question.

19|14J5 (cont)

Furthermore, in 1986, the U.S. District Court for the District of Nevada observed that, "the [U.S.] government has admitted that the 1863 Treaty of Ruby Valley is in full force and effect." (13 ILR 3158) As the supreme Law of the land pursuant to Article VI of the United States Constitution, the Ruby Valley Treaty ought to serve as an essential part of the basis of and framework for such negotiations between the United States and the Western Shoshone Nation.

We would like to remind the reader that on August 1, 1946, Secretary of Interior Krug wrote a letter to President Truman, recommending that the president sign the Indian Claims Commission Act into law. Krug told President Truman that that the bill had "international repercussions," and would come to be "viewed as a touchstone of the sincerity of our national professions of fair and honorable dealings toward *little nations*." (emphasis added) (Legislative History of the Indian Claims Commission Act of 1946, 1976, Clearwater Publishing Co.) The new finding revealed by this Report shows that United States now has the opportunity to demonstrate to the world community its willingness and its ability to engage in "fair and honorable dealings" with the Western Shoshone nation through good faith negotiations.

In a press release dated August 13, 1946, President Truman said that the Indian Claims Commission Act represented an effort to "remove a lingering discrimination against our First Americans" in order "to vindicate their property rights and contracts [e.g., treaties] in the courts against violations by the Federal Government itself." What makes Truman's words ironic is the way that the United States has for over thirty years refused to allow the Western Shoshone people to "vindicate their property rights" as a nation of people, and their treaty "contract" with the United States that describes the Western Shoshone national boundaries.

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President Truman further said of the Indian Claims Commission Act: "This bill makes perfectly clear what many men and women, here and abroad, have failed to recognize, that in our transactions with the Indian tribes, we have at least since the Northwest Ordinance of 1787 set for ourselves the standard of fair and honorable dealings, pledging respect for all Indian property rights." May this pledge on the part of the U.S. government become the basis for the negotiations between the Western Shoshone Nation and the United States.

16|14J (cont)

Finally, we end this Report with the following recommendation. Therefore, any considerations concerning land use and ownership concerns must include a full assessment and consideration of the Western Shoshone Nation and their human rights and potential environmental impacts arising due to the proposed activities.

Sincerely,

Joe Kennedy
Chairman, Timbisha Shoshone

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Kenneth, Carol
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April 20, 2008

PC_925

Mr. Ted Wyka
NNSA Office of Transformation
1000 Independence ave. S.W.
Wash, D.C.

Dear Mr Wyka,

1|7A
2|3A

Please consider an alternative to building new plutonium triggers or PITS. It is senseless to continue stock-piling weapons with the surplus available.

3|1J

Our world is becomming mad with the senseless and inhumane direction in which it is going and our government is leading us. We should know better and stand up and speak out for the betterment of the world. Please do your part and do the

Kenneth, Carol
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right thing. You will never regret doing so.

Thank you for listening.

A concerned citizen

Sincerely,

Carol K Kenneth

Kenneth, Carol
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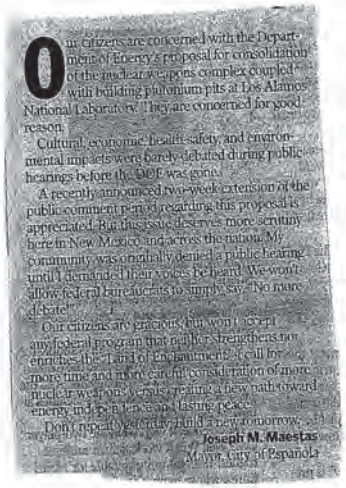

Our citizens are concerned with the Department of Energy's proposal for consolidation of the nuclear weapons complex coupled with building plutonium pits at Los Alamos National Laboratory. They are concerned for good reason.

Cultural, economic, health, safety and environmental impacts were barely debated during public hearings before the DOE was gone.

A recently announced two-week extension of the public comment period regarding this proposal is appreciated. But this issue deserves more scrutiny here in New Mexico and across the nation. My community was originally denied a public hearing until I demanded their voices be heard. We won't allow federal bureaucrats to simply say, "No more debate."

Our citizens are gracious, but won't accept any federal program that neither strengthens nor enriches the "Land of Enchantment." I call for more time and more careful consideration of more nuclear weapons versus creating a new path toward energy independence and lasting peace.

Don't repeat yesterday, build a new tomorrow.

Joseph M. Maestas
Mayor, City of Espanola

Kenny, Diane
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PC_851

Levens, Matthew

From: Diane Mike Kenny [thekennys@earthlink.net]
Sent: Monday, March 31, 2008 4:50 PM
To: Complex2030
Subject: pit production at LANL

Dear Sir(s), Madam(s):

1|16A
2|10B I want to weigh in before April 10, 2008, as being completely in opposition to any pit production at LANL, let alone increased production and irregardless of care taken not to contaminate New Mexico. Thank you.

Sincerely,
Diane Kenny
thekennys@earthlink.net
Diane Mike Kenny

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Kepner, Valerie
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PC_1691

Levens, Matthew

From: Valerie Kepner [valeriekepner@iotmail.com]
Sent: Saturday, April 05, 2008 11:31 AM
To: Complex2030
Subject: Stop new nukes

Valerie Kepner
339 E. Broad St.
Nanticoke, PA 18634-2513

April 5, 2008

Complex Transformation

Dear Complex Transformation:

I live in Nanticoke, PA. I am a mother, wife, and college professor of economics.

1|16A I am opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal.

2|9B We should spend the billions proposed for this plan on programs to eliminate nucleaer weapons.

1|16A (cont) I want a future free of nuclear weapons for my children!

Sincerely,

Valerie Kepner

Kerlin, Michael
Page 1 of 1

PC_1817

Levens, Matthew

From: Michasel Kerlin [mikekerlin@netscape.net]
Sent: Friday, March 28, 2008 2:24 AM
To: Complex2030
Subject: Complex Transformation proposal

Michasel Kerlin
23720 Brownstown Sq Dr apt 102
Brownstown, MI 48174-9365

March 28, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|1K I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

2|9B It would be very useful if the administration would cease its constant efforts to leave a weapons-building legacy behind it, of which this proposal is a part. The Energy Department should get off the bus, so to speak,at this point. This garbage costs money, at a time when we are going head over heels into debt to keep the administration's pet war going in Iraq. There are other ways for the Energy Dept to contribute to an economic stimulus besides weapon-related work.

3|1J It's especially hypocritical in view of the diplomatic goals set for forcing Iran to cease that country's uranium refinement, to proceed with our own weapons-related program.

I think you should reject this proposal.

Sincerely,

Michael G Kerlin
734-479-6658

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Kern, Mansi
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Mansi Kern
PO Box 142
Tesuque, NM
87574

April 14 2008

PC_947

To LANL/DOE to be put into the record of Public Hearing February-March 2008 comments of "Complex Transformation" Draft Supplemental Programmatic Environmental Impact Statement National Nuclear Security Administration (NNSA) U.S. Department of Energy, about their proposal to start a bomb-plex to manufacture of 80-150 atomic bomb triggers a year in Los Alamos.

1|16A
2|1F

Please record it for the hearing record that I am opposed to the manufacture of 80-150 nuclear warhead "triggers" or "pits" at LANL or anywhere in the United States. That new names such as "Complex Transformation" can't hide the fact that atomic weapons are weapons of mass destruction and are outlawed by the NPT anywhere in the world today.

The group of 1,000 scientists who worked with Einstein on the atomic bomb in Los Alamos had no idea that they were creating a very explosive bomb because each nuclear scientist worked on one aspect of the bomb to be, in ignorance and secrecy. Some of the scientists were horrified that their invention was immediately used to make an atomic bomb that once made was immediately dropped to utterly annihilate an unsuspecting city Hiroshima. Incredibly, Japan had already surrendered to the USA, but had refused to give up their emperor making dropping the bomb on them morally indefensible. Three scientists committed suicide from emotional anguish and guilt of having created the idea of something so destructive, but some nuclear scientists saw it as a quick and easy way to gain dominance in the world politics and started mass production of atomic bombs using the idea of mass destruction to hold the world hostage, endangering the world and creating astronomical piles of nuclear waste that no one knew what to do with. The dangerous legacy of this nuclear folly is that the plutonium waste could destroy the world just as much as the atomic explosions, because of it's mutino-genetic properties. The "deterrent" of nuclear weapons only worked at that time because the technology to create the bombs wasn't widespread as it is today. The deterrent was only that these bombs could destroy the planet and the human civilization and so were too terrible to ever use was nerve wracking and ineffective and the cold war was a waste because the NPT called for all atomic bombs to be taken apart wasting all that money and created huge amounts of nuclear waste. The NPT and using our advanced technology to keep nuclear weapons off the earth for all nations equally, was a real solution to the problem that such destructive weapons had been created.

3|14O
2|1F
(cont)
4|13A.1

The A bomb came together in secrecy and ignorance but today's nuclear scientists feign ignorance of radioactivity's lethal effect on the human body. Not only do the atomic bombs have 10-50 times more destructive power than the

1

Kern, Mansi
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first A- bombs. Just the radioactive waste was soon found to have pernicious and insidious mutino-genetic properties. The people in Japan's bombed cities who survived started to immediately mutate at an alarming rate and babies born during that time were genetically deformed. Atomic scientists have gotten away with their (radio)-activities because plutonium/radioactive fall -out is microscopic therefore invisible to the human eye and tasteless, but it's mutino-genetic effects left a legacy that is all too tragic and all too visible to the eye. Radioactive waste, reused radioactive particles is put into conventional bombs to give it that added mutino-genetic property in the wars USA wages, using nuclear waste as a weapon of genocide that target the unborn fetus and spreads cancer, which is unconscionable.

3|14O
(cont.)

If the fetus is female during the first 3 weeks the 250 eggs in her uterus form and if radiation is present anywhere near her few celled body radiation radiates three feet or more overwhelming the cells of a fetus which is constantly replicating and therefore very vulnerable to genetic mishap, say if the mother had radiation in her body and if the uterus is bombarded with radiation, it does great damage to the eggs of the future generations. We must protect our eggs in our females because if enough mutations of the genes occur the integrity of the human gene pool becomes compromised.

Another terrifying effect of radioactive particles in plutonium is on the male sexual reproduction system. It is a well-known fact that radioactive particles end up in the gonads. Our reproductive systems are especially vulnerable to the x-ray like rays emitted from particles that are unknowingly lodged in our body that can radiate in a 3 foot or more radius. Some examples of genetic mutations from radioactive exposure are the non drinking or smoking Mormons in Utah who were downwind of Nevada bomb testing sites who had horrible birth defect rates with such severe birth defects as babies born without the top of their skulls that were caused by the radioactive fall out. One veteran who I heard at a hearing said he hadn't been cleared out before the atomic bomb was dropped and who experienced the Hiroshima bombing said all of his 7 children had deformities, one child was born with no skin, the gene for skin had been apparently knocked off. He told the hearing that his wife contacted radiation from having marital relations with him, apparently he said that the radiation traveled into his gonad and into the sperm (which he got tested to verify that it was radioactive), which got inside his wife during intercourse and she got cancer.

As every scientist knows any reproducing cell has to completely reproduce its genetic structure over and over to miraculously form a human body from a tiny egg and sperm cell. A developing fetus is genetically multiplying at a rate that if kept up would in a life-time would grow as tall as the moon. Children's genes are multiplying continually and that is how babies grow into adults by cell replication and this process must not be sabotaged by radioactivity and so children are very vulnerable to genetic mutations and rampant cancer in children is the terrible result. Did the LANL scientists at the hearing March 13 tell us about that?

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Kern, Mansi
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3|14O (cont.)

Our sexual reproductive systems, especially those in males needed to produce their human genetic codes in their millions of sperm can be disastrously affected by the presence of atomic particles that knock off a gene or two here in the gonad, which manufactures their seed. Radioactivity is radiating all over the body but the mutations really show up where the body cells are replicating because radiation is a ray many times more powerful than the human electrical system, which beams into the cell, knocking off bits and pieces of genetic and cell matter indiscriminately causing havoc in the human body.

In other words a WIPP truck is dangerous because it is a driving x –ray machine and could be irradiating a person or knocking off bits of their genetics as they drive or radiating the people in the cars as they drive by. You could be standing on a plutonium particle and it will knock off a few bits of your genetics. If you inhale a piece of radioactive dust you could have a particle in your body that sits for years knocking and slicing up the cells on a microscopic level. This quality of plutonium particles is disastrous to the genetics of humans, animals and even plant which all share 90% of the same DNA. These same radioactive particles float invisibly in the water and air entering living organisms for 260,000 years until they biodegrade.

Plutonium never existed in the world and is astronomically horrifying what it can do to the human body. This is why the NPT exists, to protect human kind from genetic extinction from the radioactive fall out from bomb tests and the radioactive waste from just the manufacture of atomic bombs. Even if, God forbid, a few of the 40,000 atomic bombs already in existence were actually dropped these few atomic bombs could create a deathly dust to block out the sun for a long time, which is why all of the atomic bombs are supposed to be taken apart (NPT) and why nuclear warheads of every description: ("small", 50 times more powerful than the ones dropped on Hiroshima. Complex Transformation at LANL bragged about making **atomic bombs that are "efficient", quick to reassemble, mix and match parts all the parts but these are terrible qualities in explosives that have to be outlawed.** The dust from a large city disintegrated in one of the atomic explosions could make that much dust! This is called nuclear winter **and I suggest that LANL review all the extensive research that has been done regarding nuclear winter.**

If you recall there was a possibility that just one huge comet that landed on the earth was responsible for creating enough dust that the plants had no sun causing the mass extinction of dinosaurs. This is the same effect that nuclear winter would have on the human race if only a few of those atomic bombs we have today were dropped on large cities creating huge amounts of obliterated matter/dust that would block out the sun for many months or years. All the plants would die and humans would soon die of starvation.

This genetic mutation from plutonium radioactive particles doesn't show up right away in visible defects and subatomic plutonium particles are hard to gather up, the technology to do so must be made now to save the human race because the plutonium radioactive particles that have a half life of 260,000 years

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re-circulate on the earth before they biodegrade (making them the most toxic and long lasting poison known to man) may show up anywhere in the world and repeatedly contaminate the environment. Since water and air circulate around the entire planet and the plutonium particles travel in the air and water, these particles must be scouted out and contained and no more plutonium particles should be made. Plutonium is the active ingredient in bomb "triggers."

The LANL scientists who made this plutonium are responsible for every particle of radioactive fall -out that they made and they must find ways to find these particles and start "cleaning" up the USA and the planet. LANL scientists started this technology and they must use their technology to clean it up. LANL scientists are the only ones that know this technology enough to start to track down atomic particles and contain them in plants that are treated as nuclear waste or put them in long lasting glass so that particles of it can't float around, etc. Highly sensitive technology exists that can spot a radioactive particle from miles away. I feel it imperative to spend the tax money for clean up research. Making plutonium should be forever banned and all technology exerted to keep it off the face of the earth.

5|7J

At the hearing March 13 in SF about LANL's proposed bomb-plex The scientists that spoke there were obviously being encouraged to try and pull the wool over the NM citizen's eyes by denying that even one particle of radiation was in the Los Alamos water table. Nothing could be farther from the truth when in fact 50 years of radioactive particles already permeate LANL and areas of nuclear manufacture in NM. Neither ignorance nor denial will make their nuclear schemes viable in the world arena. The scientists appeared to be out of touch with reality and out of sink with the exigencies of times we live in. The inflated, grandiose and puffed up old pipe dream that nuclear arms will save America as part of national security have long had holes poked in it by the NPT and CTBT negotiations. The whole world decided that nuclear warheads made the world unsafe for anyone.

6|3A
2|1F
(cont)
7|1E

Carl Sternglass's extensive research revealed the startling facts about the devastating health effects on fetus's in mothers who live near nuclear power plants or who were in or near nuclear explosions and the even more devastating effects of babies born to mothers who lived near bomb production facilities such as Rocky Flats or survived but lived to rebuild Hiroshima and in fact to any human being of any age who is exposed to radioactive contamination, anywhere in the world.

3|14O (cont.)

Anti-nuclear activists have long known that tritium, which is a radioactive by-product of the trigger making process is especially devastating to the human body, entering the human even more readily than plutonium (some forms of tritium enter the skin by soaking in). Plutonium can't enter the skin but once plutonium is inhaled starts it's mutative process in the human body. A very ignorant high school science teacher at Santa Fe Prep used to let his students hold plutonium in their hands, never realizing that just the rays could've been radiating the student's reproductive organs and causing future mutations. In the

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event that the bomb complex transformation of LANL from a research into a bomb manufacture factory the Santa Fe area will be inundated with tritium and other toxic radioactive substances which is a crime against humanity.

It's terrifying to see the clash when the human logic of religious superstition (such as that it's the end of the world, rapture) and territorial wars of primitive, un-evolved human instincts mix with the uncontrollable power and fury of the destructive atomic bombs and it's waste products. The result of human beings playing war games and strategies with atomic forces that are way beyond our control and that make wastes that can erode the human gene pool if left in the environment which in time can destroy the human race even if there never was the unthinkable nuclear war, Just the nuclear waste can cause as much or more destruction to the planet then the exploded atomic bombs if we can't find ways to clean radioactivity already made up.

3|14O (cont.)

Due mostly to the radioactivity in the environment, the rate of cancers are increasing in the USA. One in five people get cancer in our 2008. "The cancers today," say Physicians for Social Responsibility, "are more pernicious, come on faster, in fact are rapaciously fast in causing death."

The rate of autism is epidemic in America today affecting the astronomical 1 in 5. Heavy metals such a mercury and chromium are equally if not more dangerous to the brain as radioactive wastes and are implicated because not just plutonium is the by- product of LANL. Heavy metals of every description are released into the air from LANL.

Most experts say that LANL, nublear bomb research placed in a tall pine forest zone is a terrible idea and that houses, much less nuclear labs and bomb production sites shouldn't be built in high mountain zones where fires are a natural part of the ecosystem. LANL has been plagued with fires and also is built on a fault making it unsafe to build LANL's new "bomb- plex" there. LANL's new bomb-plex will inevitably cause many nuclear fires because nuclear materials are unstable and often spontaneously combust if exposed to even air.

The rate of schizophrenias and mental illness is epidemic and heavy and toxic metals such as radiation are crossing the blood brain barrio and are getting into the human brain. America will be dissolved from within as our brilliant scientific minds disintegrate as the brain is **contaminated with heavy metals now implicated in causing psychosis. Even the smartest "brains" can end up in as mental patients in back wards or in outpatient facilities with severe cognitive disabilities. Mental aberrations, i.e. "mental illnesses" are rampant in the United States many think are due to abnormal radiation and heavy metals spewed out from the nuclear fires in Las Alamos Rio Grande Fire, Washington Nuclear fire's and Rocky Flats fire and Chernobyl's nuclear fire all in the same year spread nuclear waste thousands of miles in every direction.** This is not the fate that Americans want and this is not national security to cause a meltdown of human brains and reproductive systems in the human body from radioactive fallout/waste/

5

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The Chernobyl nuclear explosion caused a 50% increase in women's breast cancer and what about the male gonad which is equally affected as the breasts? What about the Laplanders who had to slaughter 10,000 radioactive reindeer from wind born nuclear/plutonium dust from Chernobyl and they live at the top of the globe? What happened to the humans that were irradiated? Sternglass studied the effects of fetal mutations of pregnant mothers within 15 miles of nuclear power plants. Advocates of nuclear power plants must realize that bomb manufacture is dependent on the explosive power from the nuclear power plants to transform uranium into plutonium with it's half life of 260,000 years which is used to make the triggers for atomic bombs, making power plants integral and inseparable partners to the nuclear industry because power plants in fact make the plutonium needed for atomic bomb production.

3|14O (cont.)

Contrary to the claims of one nuclear scientist in the hearing on March 13 in SF at the Genevieva Center (probably paid to be there), said that Los Alamos has the lowest cancer in the nation. But the fact is well known in Santa Fe that the incidence of brain cancer is astronomical in LANL/Los Alamos, up to 60 people are reported to get brain tumors a year. The human immune system is also under attack from an assault from the nuclear industries by products. The health risks involved in the nuclear industry, the mining, the research, the testing, the pit production, nuclear power plants that make the plutonium with their "melt down" disasters all the way up to the heinous product: atomic weapons which have unthinkable planetary destructive potential all make it unthinkable to produce. Dirty/polluting pernicious and planetary destructive from start to finish so atomic bombs were outlawed by the NPT and the USA should definitely comply to the NPT. The nuclear scientists at LANL and DOE aren't in control of this NPT international law and they are arrogant to flaunt their independence from NPT regulation, in fact scary because USA will be seen to advocate anarchy, or every nation for itself. Far from creating security for the USA by building nuclear bomb pits at LANL endangers us from within from devastating health effects of radioactive waste on our unborn and the children and from without by the numerous nuclear catastrophies (from power plant melt downs and nuclear fires, escaped dust) that spread nuclear waste far and wide or the rampant ideology that nuclear bombs protect national security so all nations must have them to protect their borders provoking ever more dangerous nuclear arms races, ever increasing the chances of nuclear mishap that ends it all in human extinction. LANL should be in consultation with the UN and creating atomic bombs in secrecy is not allowable in the world today. The NPT is far too important in the political arena in 2008 for DOE and LANL to ignore.

Opposition to the WIPP Waste Isolation Pilot Plant issue generated more letters of protest to the congress than any other issue in the history of the United States because every American state would be impacted by the nuclear waste bearing trucks going through the entire length of the United States, spreading radioactive dust and because the WIPP trucks are moving x-ray machines radiating not only the pitiable truck drivers of nuclear waste but unsuspecting

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Kern, Mansi
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people as they go by in their cars (keeping in mind that x rays cause genetic mutations and cancer and even for one ray people wear heavy lead aprons to protect themselves. People in cars aren't wearing lead aprons.)

The American public knew this because they are educated about the negative effects of radioactivity in all of its forms on the human biological systems. Richardson was supposedly the champion against WIPP and he attended numerous hearings to show his support that NM not be made into the first nuclear dump facility in the United States. Many felt that it was safer by far to just leave nuclear waste where it was until the technology evolved to contain it. Contamination of massive layers of earth were involved. As soon as Richardson got into DOE office he signed the papers to start the WIPP project as the first nuclear waste depository in the United States making it very dangerous to live in NM in such a radioactive "stew".

3|14O (cont.)

The horrific mutino-genetic and heinous health effects were effecting populations that had bomb making in their backyards and the other states were screaming to get the waste out of their states but moving the waste was a terrible idea. The scientists at Los Alamos must work on technology to really contain radioactive waste before it all gets out into the environment to wreck havoc on the human race. Carlsbad Caverns where WIPP was put is made of Salt beds formed by the presence of ancient ocean water and underground river beds that still exist there will take the waste into the Gulf of Mexico and out into the ocean, which is a crime against humanity.

I recommend that LANL, DOE and the Representatives of NM **study all health records related to humans beings that have been in contact with radioactive materials as part of their Statewide Environmental Impact Statement** about their proposed weapons production at LANL such as the viewers of the first atomic bomb testing which one by one died of radiation related cancers. **A World Wide Environmental Impact Statement should be made to review the environmental and political repercussions to starting bomb production, WWEIS. A lot of consultation needs to be done by the nations to make the world safe, atomic bombs in and of themselves do nothing to make strong alliances with other nations but in fact infect and erode confidence and credibility in the USA.**

8|11E

Before any new nuclear projects begin at LANL I suggest that the SWEIS include consultation with the Tiger Team of LANL that were whistle blowers about hundreds of safety violations who were fired from LANL, their reports should be revisited and made an official part of the "Complex Transformation" EIS because their records revealed that LANL labs were incompetent and that LANL was being irresponsible and not protecting their workers or the public from nuclear radiation. As a consequence of the lies and deceit at the LANL and other nuclear bomb facilities the workers at weapons research and production labs who were contaminated and died, are numerous in number. LANL has been found to be incompetent simply because they are in denial the plutonium is a deadly substance and therefore are incapable of

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treating radioactive substances with the sensitivity and care to make it "safe." The technology to make nuclear materials "safe" doesn't exist but the carelessness with which the bomb producers polluted their states speaks of criminal and careless neglect of deadly substances. LANL shouldn't be trusted to make atomic bombs because it is steeped in secrecy and denial, a fear of communicating problems or they'll loose their jobs and so no one would report or do anything about infractions of safety.

3|14O (cont) 8|11E (cont)

The high incidence among the miners and mining towns that lived in Southern NM by **uranium mine pilings and had an inordinate amount of groin cancer need to be included in the SWEIS (State Wide Environmental Impact Statement).** Radioactivity affects areas of the body that are growing and areas of the body that are quickly replicating such as fetuses, children, sperm production in the testicles of males that is transferred to females and in the female breasts. The body tries to hide radioactive wastes in the bones and radioactive calcium gets put into the bones causing leukemia and the radioactive thyroid goes into the thyroid causing thyroid cancer. Where these types of genetic mutations and cancers exist it's a dead give away that toxic radioactive particles are in the environment. **The SW/EIS should include intensive and humane studies on why radioactivity migrates into the gonads of the human system or affects it so adversely. Male groin cancer is a frightening prospect. Male prostrate cancer is also rampant in America and radioactive waste must be implicated in this inhumanity of man to man.**

The inhabitants of Hiroshima after the Atomic bombing suffered terrible genetic damage and many areas of Japan wouldn't marry people near that explosion because they rightfully feared genetic mutation. It is by now well know that radiation causes genetic damage and it is not wise to forget that radiation is mutano-genetic or stay in ignorance that it is the rays in radiation that are making it mutate genes.

The Sierra Grande nuclear fire in Los Alamos officially burned up 1,000 of the 2,000 known nuclear dumpsites and one third of the LANL labs releasing toxic metals and radioactive contaminants 500 miles in every direction. **The LANL EIS needs to include these nuclear fires that have been a regular occurrence in NM and have had disastrous consequences to the health of NM and the surrounding states.**

I recommend that the records of Rocky Flats health and safety violations be reviewed extensively by the SWEIS/EIS and LANL so that the devastating lessons learned at Rocky Flats bomb production site may be remembered for all time. Honesty from the DOE and LANL scientists is imperative because the public in NM and other states have been the victim to terrible personal suffering to the whole radioactive bombs production and this needs to be officially recognized by the LANL.

9|14M.2 8|11E (cont)

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War itself is a satanic institution and I believe that ignorance is the definition of evil but for the LANL nuclear scientists to intentionally lie about health issues that affect NM, the US and the world and call bomb manufacture "safe" and "efficient" is something most Americans and international law institutions just won't swallow. The evidence of the devastating destructive power in not only the atomic weapons produced at LANL and other bomb production sites in the world that are now uninhabitable waste lands that no one can enter are a stark testimony that the nuclear era produced nothing that can make the USA or the world safer.

The nuclear scientists must admit defeat for their pet project: nuclear bomb manufacture and get to work backing the NPT about outlawing atomic technology from the face of the earth, using every iota of their technology to clean up their nuclear mess and devoting their brilliant minds towards sustainable and clean energy. The one and only deterrent that will work in the political arena is that one bit of knowledge: that the human race and all ecosystems and biological beings on this earth are deeply interconnected and must work together as one, not a pious hope but a fact. 10|9B

Diplomatic and Conflict resolution experts, humanitarian aid to other nations, true allliances with other nations of integrity, a strong federation of nations, consultation tables at every level of the world, communication, equality and justice for every human being with strong international laws to protect the planet from anything that could destroy it, firm consequences for rogue nations that are destroying the planet and it's ecosystems that all beings on earth depend on are the only national security. It's time to get back to the negotiation tables with each and every nation and once again review the terrifying legacy of nuclear war until each and every nation simultaneously lays down it's arms for one nation to do so is suicide, all must agree and consultation must continue until all agree and any rogues must be pressured into compliance. 2|1F (cont.)

Once the USA shows intent to be compliant to the NPT the other nations will see the futility of running another arms race and also comply. This is the one and only national security in regards to atomic bomb production in the world today.

The human body is not a machine but is made of soft and vulnerable, replicating cells which make it highly vulnerable to the blasting radioactive rays that slice humans up on a genetic level and mutate replicating cells, which undermines the integrity of the human body.

Please make strong laws to protect NM and the world from the continued nuclear manufacture processes and the massive ignorance that nuclear technologies that are by nature never ever "clean" or "safe" are a grave danger to the citizens of NM and the human race. Instead **of promoting ignorance** as the LANL scientists were in their March 13 hearing to promote "Complex transformation" make it their business to **educate every man women and child on earth from now on to the grave danger that nuclear weapons** 11|7A

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pose to our planet and therefore keep proliferation of weapons of mass destruction from ever being allowed on earth again. 2|1F (cont) 3|14O (cont)

International laws to protect the planet from destruction such as the NPT are like chains to keep two mad dogs (mad nations) from destroying each other. Nuclear madness is nuclear proliferation of which the sure end result is planetary destruction thereby making insane any claim to bomb production as national security. Nations aren't insulated capsules that are against "the others" "the enemy." The world isn't divided into neat little pieces of pie to be defended but the world in reality is truly one, integrated and interconnected web of life. Air, earth and water are not to be carelessly squandered resources to be used for nuclear bombs and nuclear waste but are the elements all living organisms on earth are composed of, so endangering the air and water endangers the whole web of life, this is well known by now.

Once human beings truly realize that the planet is one there won't have to be international laws to outlaw anything that could destroy the planet, it would be unthinkable to bomb "the other" because it is the same as bombing "our-self." In other words world security is national security and all nations must realize that nations are just convenient, the world of the future may be divided into ecosystems. Mankind is surely becoming more mature and if all nations and all humans are treated as equals and given justice there is no reason to try to take over other nations, or for huge corporations to make money off of others. Huge, greedy corporations that promote planetary human and animal extinction and the human race collectively must be limited. The living organism's right to a nitch in the eco system, the human right to be cancer free and produce un-mutated children, the NM right to live a healthy and safe life and to expect to reproduce grandchildren and future generations of healthy children matter.

Once strong international regulatory laws are made firm in the world arena chaos and national anarchy will be quieted. LANL and DOE non-compliance to NPT and flaunting "new" and "small" weapons to the world's face without the backing of the USA people or the other 200 nations who in good faith laid down their arms in the NPT is national anarchy. "Small" atomic bombs that fit into a pencil or suitcase are nothing to brag about but further development of atomic powers is not a cure for nuclear madness as "Complex Transform" states but a curse upon humanity.

Having the nuclear "triggers" separate from the bomb casings ready to mix and match them in a few minutes with a variety of chemical and nuclear waste options (making atomic bombs out of conventional bombs by adding nuclear waste in them). Do these bomb –plex promoters think that the public can't discern that just because the nuclear bombs are in parts that they can assemble in a few minutes that they still aren't weapons of mass destruction? Each "trigger" is in fact a nuclear weapon/ weapons of mass destruction, in fact outlawed by the NPT. nless we publically withdraw our USA signature from the

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NPT treaty making our USA nation into the lowest of the low rogue nations in the world arena that won't sign the NPT.

The LANL repeatedly stated in the March 13 hearing that they are ready to work on other issues threatening the world such as global warming but that the world isn't ready to lay down it's nuclear weapons yet, maybe by 2017, which might be too late, so the NPT must be strengthened by US backing. I say that the world is ready now for the nuclear industries of all nations to transform into life affirming technologies and not more atomic bomb production, a new arms race of ever more harrowing ways to exterminate ever more masses of civilization which is the exact and only end goal of nuclear proliferation. It just won't work because we'll destroy ourselves, the great USA nation, in the process and so it is useless, anti-life, suicidal and unproductive for any nation to proliferate nuclear arms. That's what the NPT is all about. The LANL and DOE should be required to meet with all the nations who signed the NPT and go over the reams of information accumulated that led to the decision to make the NPT an international world treaty in the first place.

2|1F (cont.)

LANL proposal to start nuclear plutonium "pits" or "triggers" is definitely nuclear proliferation. Proliferation is "obsolete" LANL is a "dinosaur" that must go extinct for the world to survive. Technologies to clean up nuclear waste must be the only proliferation to save the planet and our nation right now. LANL needs to either start this clean up or clean out of NM so that it can begin to heal. The idea of nuclear proliferation as a "deterrent" that if nuclear war breaks out well all be blown up by the 40,000 nuclear bombs in existence is indeed insane because the atomic weapons aren't just a "deterrent" or an idea of consequences but in fact are real explosives of planetary destruction that must be outlawed for our planet to survive. If the USA goes down promoting integrity and world cooperation it is better than going down promoting an all out arms race and goading competitive technologies that are worse and worse ending in an all out atomic war that wipes most of planetary life out. There's no way to win this control/domination of the world as a way to force peace but peace will come when all races, sexes and nations are equal and there is justice worldwide. Anyway you look at it, the only hope, even if it's a faint hope, is to stop nuclear proliferation, NPT. The USA without all its technological mix and match weapons of mass destruction would probably not roll over and die but the USA would have to stand naked of their nuclear arsenal and the worst thing that could happen if USA followed the NPT is: God forbid the USA would be equal with the other nations.

12|1J
4|13A.1
(cont)

I used to drive up to LANL and notice that all around the labs the pine trees had a blackened, demented and corroded look. After the Sierra Grande Fire the trees, humans and animals in Tesuque have the same look of 'the unhealthy." The "yellow dust of sin"/plutonium was a creation/an ideology of hate and fear for "the other" an outdated concept and it's contamination is physical but it also is of the mental kind, that like the yellow gold seems to corrupt the human soul with all consuming greed that will stop at nothing to gain power over other nations, all others. But greed is not a world value that peoples

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Kern, Mansi
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of the world admire. Greed is not the main element or even an element of a democracy, which is run by the people. If the people ran this country there would be strong environmental laws. Corporations are overriding the people's wish for a clean environment. Greed is not national security but corruption and corporations that promote nuclear proliferation as a big business has always had an element of greed to it. There are many ways of making billions of dollars without selling bombs, illegal or legal psychiatric drugs with all their addictions, or selling hamburger fat and junk, artificial world. NM makes 1 billion dollars in art sales, so art makes more money than bombs. Growing oranges or exchanging art or tourist trips can make NM a sustainable economy. The nuclear industry is not safe or sustainable. LANL's plans to transform LANL from a research into an A-bomb production site is a waste of NM and the USA tax money. The Native American art and culture is far more sustainable. Solar, wind geothermal is perfect for LANL. Times are changing and new energy sources will be on the winning edge as is self sufficiency, not profiting from keeping people addicted to destructive technology.

13|9H

The song-birds are disappearing. A hemorrhage of animal extinction is occurring because of human mistakes/human contaminants, the snakes and tiny horned lizards are very, very scarce in NM, the bees are disappearing and so are the flowers, the web of life is faltering and fading from our planet all because of nuclear waste is the worst of all pollution's because it damages the genetic makeup of living organisms and so is a crime against the whole world that could be tried in the world court if America would sign it in. Let's use technology to stop the hemorrhage in the organisms of the world. Let's use international laws to stop the hemorrhage of integrity in the USA and the credibility of the USA in the world arena, which is hemorrhaging as well. Let's make NM, LANL a leader in green technologies that LANL scientists can truly be proud of. Let's transform LANL scientists of inventors of mass destruction into scientists of planetary healing, then and only then will LANL be in harmony with New Mexico and New Mexicans vision as being a healing Mecca for the planet. Leave "saving the planet" to God, no scientist from LANL can guarantee to "save the earth." If humans act with integrity and good faith set up international laws to protect the planet from destruction then I think all corrosive elements in the world today will have to subside but this all depends on USA strongly backing strong International Laws such as the NPT.

2|1F
(cont.)

Sincerely

Mansi Kern

Mansi Kern

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Kerr, Amber
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PC_1276

Levens, Matthew

From: Amber Kerr [akerr@berkeley.edu]
Sent: Thursday, February 07, 2008 1:14 PM
To: Complex2030
Subject: Please reject "Complex Transformation" plan to build new nuclear weapons

Amber Kerr
2321 Grant St.
Berkeley, CA 94703-1715

February 7, 2008

Theodore A Wyka
Complex 2030 SEIS Document Manager
Office of Transformation, U.S. Department of Energy, NA–10.1 1000 Independence Avenue, SW.
Washington, DC 20585

Dear Theodore Wyka:

1|16A The Department of Energy should reject proposed Complex 2030 project.

2|3A 3|5C1 4|9B The argument that the current arsenal is aging is faulty. An independent panel of scientific experts recently certified that the current arsenal has a lifetime of 85 to 100 years. Complex Transformation is expected to cost upward of $150 billion dollars and is a poor use of funds given the real security needs of the country.

5|1J The new arsenal would also be bad foreign policy. We need American leadership in convincing countries like Iran and North Korea to forgo nuclear weapons. I am concerned that revamping the current arsenal could lead to renewed nuclear tests, which would send a dangerous message to the international community.

5|1J (cont) 1|16A (cont) By building up its arsenal, the US would essentially be telling the world to "Do as I say, not as I do." Please stop any plans for a modernized nuclear arsenal, so the US can assert its leadership for a global effort to control the nuclear weapons threat.

Sincerely,

Amber Kerr

1

Kershner, Harry
Page 1 of 1

PC_893

Levens, Matthew

From: Physicians for Social Responsibility [webmaster@psr.org] on behalf of Harry Kershner [hkershner35@yahoo.com]
Sent: Tuesday, April 01, 2008 4:00 PM
To: Complex2030
Subject: nuclear weapons

Apr 1, 2008

Mr. Theodore Wyka
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Wyka,

Re: Draft Complex Transformation PEIS (DOE/EIS-0236-S4).

1|14O This program endangers the environment and human health.

2|14K A human health risk assessment should be conducted, A nuclear posture review should be completed prior to any final decisions.

3|1C Results of epidemiologic studies of radiation health of workers and communities need to be disseminated.

4|1J We need to know the clean up tasks necessary to respond to the significant environmental and public health harms caused by Cold War nuclear weapons production activities.

Sincerely,

Mr. Harry Kershner
9322 N Oswego Ave
Portland, OR 97203-2339

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Kessler, Frederick

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STATE REPRESENTATIVE
FREDERICK P. KESSLER
WISCONSIN STATE ASSEMBLY 12TH DISTRICT

PC_1070

February 23, 2008

Statement by Representative Fred Kessler on Complex Transformation

In 1945, the world witnessed the devastating potential of atomic weapons. In that year, the United States Government made the decision to use the overwhelming, destructive power of the atomic bomb in an attempt to bring a world war to an end. However, in using this weapon, America unleashed a great curse on all nations and people. Through the long years 1|16A of the Cold War to the threat of national and sub-national terrorism today, we have lived to regret the fruits of the "Manhattan Project."

In the following decades, leaders from all parts of the globe have come together in efforts to defeat the proliferation of nuclear weapons. The United States signed and ratified the Nuclear Non-Proliferation Treaty in 1969. In doing so, our country made a commitment to "*pursue negotiations...on effective measures relating to cessation of the nuclear arms race at an early date and to nuclear disarmament...*"

2|1F It is important that the United States honor its obligations. I believe a program such as the Department of Energy's proposed Complex Transformation would both literally and symbolically be a violation of our agreement with the other Non-Proliferation Treaty signatory nations.

Recent studies show that America's current nuclear weapons stock is 3|5C.1 sufficient for the next hundred years. Therefore, there is no reason to pour countless billions of taxpayer dollars into a new program to rejuvenate our 4|1J nuclear weapons complex. Doing so would only incite hostile nations to advance their own attempts for nuclear enriched weapons and undermine future non-proliferation efforts.

5|9B It is my sense that if the federal government has the money to build bombs, than presumably it also has the money to build schools. Our scarce resources should be used to ensure that all Americans have access to affordable healthcare, to protect our environment, and to see to it that our educational system returns to the head of the class.

The United States should live up to its word. We must stop advancing the military-industrial complex and again become a beacon of peace and prosperity.

State Capitol: Rm. 302 North, P.O. Box 8952, Madison, WI 53708 ♦ (608) 266-5813 ♦ FAX: (608) 282-3612 ♦ Toll-free: 1-888-534-0012
District: 11221 W. Sanctuary Drive, Milwaukee, WI 53224 ♦ (414) 535-0266 ♦ E-mail: rep.kessler@legis.wi.gov

washington, DC

Keto, Ray

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PC_1682

Levens, Matthew

From: stutzdriver@gmail.com
Sent: Saturday, April 05, 2008 9:47 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|16A Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE
2|3A should focus on shrinking the still-oversized nuclear weapons complex and on maintaining the safety and security of our existing weapons arsenal as the size of our nuclear stockpile is reduced.

I ask that you include my comment as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project. Thank you.

Sincerely,
Ray Keto
3405 Wedgewood Drive
New Bern, NC 28562

cc:
Representative Walter Jones
Senator Richard Burr
Senator Elizabeth Dole

1

Kidd, Judith
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PC_506

Buenaflor, Justin

From: J KIDD [judkidd@msn.com]
Sent: Tuesday, March 18, 2008 3:41 PM
To: Complex2030
Subject: Draft Complex Transformation SPEIS Comments

Dear Mr. Wyka,

1|16A; 2|1F; 3|1J I strongly oppose the DOE's Bombplex. It does not make me feel secure! The Bomplex goal of creating 5O to 125 nuclear weapon triggers per year is in direct violation of the Nonproliferation Treaty which has been agreed to by our country. It will open the door for weapons to be produced not only by the U.S. but by other countries who will continue to fear the power of our country. This is a very dangerous and destructive step in world relations. We must, instead, seek to dialog with other counties and work with them as partners, respecting each human's right to an safe and meaningful life -- "the right to happiness" as our Constitution states. We must be partners with other countries to create a sustainable world society. Any other path greatly endangers our species.

4|14K In addition, the contamination resulting from open/burn denotation areas will subject our children and future children to greatly increased air pollution, already a major problem. As a citizen of New Mexico I am particularly opposed to this policy.

No to Bomplax or any other plan to increase Nuclear weapons.

Sincerely,

Judith Kidd

1

Kidd, Margaret
Page 1 of 1

PC_1448

Levens, Matthew

From: Margaret Kidd [megkidd@webryders.net]
Sent: Tuesday, April 29, 2008 4:18 PM
To: Complex2030
Subject: Oppose and defund new Nuclear Weapons

Margaret Kidd
PO Box 149
Keene, NH 03431-0149

April 29, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

Please defund plants for producing nuclear weapon plutonium pits.

16A The militarism of our country and the massive markets of arms dealers must come to an end. The history of arms being provided to both sides of armed conflicts characterizes the unending nature of resource waste, destabilization and destruction.

We have both a need and opportunity for an historic turn to renewable energy and vision for coexistance in the world.

The US must lead by example.

Please reject the CMRR project.

Sincerely,

Margaret Kidd

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Kidd, Will
Page 1 of 1

PC_2142

Levens, Matthew

From: Will Kidd [gwillkidd@yahoo.com]
Sent: Thursday, April 10, 2008 2:16 PM
To: Complex2030
Subject: Time to take them all apart

Dear DOE--

1|2O; 2|1J I grew up in Oak Ridge, TN, and I have as much appreciation as anyone for the amazing technology built up around manfucturing and maintaining advaiced weaponry, and the associated jobs that go along with it. Despite whatever negative economic impac eliminating weapons work would have on my home town and friends who still work there, I STRCNGLY urge you to reduce our nuclear stockpile immediately, and work towards totally eliminating them all.

3|16A Short and Sweet--my message is it's time to get rid cf the things. The world will be much better for it, even if Oak Ridge (and Los Alamos etc.) pay some price.

Sincerely,

Will Kidd
11309 Sam Lee Rd
Knoxville, TN 37932 (about 3 miles from Oak Ridge)

Will Kidd
gwillkidd@yahoo.com
11309 Sam Lee Rd.
Knoxville, TN 37932
865 765 3514

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5/19/2008

Kind, Linda
Page 1 of 1

PC_1138

Levens, Matthew

From: Linda Kind [lee@milfordcable.net]
Sent: Thursday, March 27, 2008 1:42 PM
To: Complex2030
Subject: Reject "Complex Transformation" plan to build nuclear weapons

Linda Kind
1204 S Ave. Apt. 105
Milford, IA 51351-1430

March 27, 2008

Theodore A Wyka
Complex 2030 SEIS Document Manager
Office of Transformation, U.S. Department of Energy, NA-10.1 1000 Independence Avenue, SW.
Washington, DC 20585

Dear Theodore Wyka:

1|16A The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal.

1|16A (cont) This needs to stop! I sure for one, wouldn't want to be the one to push the button to do this again. Have you not seen or forgotten what this sort of thing did to mankind? Would you like this hanging over your head? I would rather see money go for stopping everyone 2|9B from developing this kind of mass destruction not promote it. It's nothing but bad news for all of us. If we don't get hit by one the waste from making them will get us anyway. 3|14M3 Please, I hope that you think about all of mankind, and find it in your heart to stop this.

4|1J By building up its nuclear arsenal right now, the US is essentially telling the world, "Do as I say, not as I do."

Sincerely,

Linda Kind

King, Alice
Page 1 of 1

PC_1748

Levens, Matthew

From: Folly King [follyking@hargray.com]
Sent: Friday, March 28, 2008 4:46 PM
To: Complex2030

1|16A
2|3A
Dear War Mongers, Stop it! If you manufacture any more nuclear weapons or allow any more in our country. you can't be very smart. WE HAVE ENOUGH NUCLEAR WEAPONS TO KILL EVERYONE ON THE FACE OF THE EARTH MANY TIMES OVER ALREADY. And that goes for anti-personnel weapons and land mines.

1|16A (cont)
Put your energy into figuring out how we can all get along and how to get rid of as many weapons as possible by as many countries as possible. Am I a realist? Yes, because there is really no alternative. Come on put some energy on the good side.

Sincerely,

Alice King

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King, Janet
Page 1 of 1

PC_1765

Levens, Matthew

From: Janet King [janetthornking@yahoo.com]
Sent: Wednesday, March 26, 2008 10:44 AM
To: Complex2030
Subject: nuclear weapons

1|16A
2|1J
Dear Mr. Wyka: We must stop building new nuclear bombs and destroy what we have. We cannot serve as a bad example to other nations who have many fewer bombs and yet we complain that they should not have any;

Sincerely, Janet King, 28 Upland Rd, Wellesley, MA 02482

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King, Joan
Page 1 of 1

#16 3R afternoon PC_125

STATEMENT TO THE DEPT. OF ENERGY COMMENT PERIOD
CONCERNING COMPLES TRANSFORMATION

I was 13 when the first atomic bomb was dropped on Hiroshima. President Truman was told that it would take at least 10 years before the Soviets could get the bomb. They had it in four. Britain, France, and China joined the nuclear club, and for a while there were 5 nuclear-armed nations. Today there are 9 and apparently more to come.

I am 75. Since my mother lived to be 97 and my doctor tells me I am in good health, I may live another 20 years; but the world is becoming increasingly unstable, and humanity has already experienced several close calls with its nuclear arsenals. If, in the next 20 years, we continue the nuclear arms race, international catastrophe is not only possible, it is probably unavoidable. 1|1J

In a single lifetime humanity will have traveled from the first nuclear explosion to worldwide destruction. What are the alternatives? As far as I can see, there is only one. We—all of us—must all turn our attention to nuclear disarmament. Now the question becomes: How? 2|3A 1|1J (cont)

A number of worthy individuals and organizations are working on this, and they are not naïve idealists. They are experienced senior policy people like Georgia former Senator Sam Nunn. They are international coalitions like the U.N. Institute for Disarmament Research in Geneva. I won't list any more, but it is this kind or work that needs our support and our money, not a new bomb complex. 3|9B 4|16A

To build more nuclear bombs (we already have thousands on hair trigger) is like trying to spend your way out of debt. It can't be done. I respectfully submit that there is a viable alternative to Complex Transformation, and it is Nuclear Disarmament. 2|3A (cont)

It's the least we can do for our children.

Joan O King
304 Manor Drive
Sautee, GA 30571

King, Joan
Page 1 of 1

PC_1386

Levens, Matthew

From: Joan King [joank@alltel.net]
Sent: Tuesday, April 08, 2008 11:52 AM
To: Complex2030
Subject: Complex Transformation

Developing a facility to build more nuclear bombs at a time like this is insane. 1|16A

DON'T! There is little more I can say on this. I have already lost all faith in our government because of its relentless stupidity and agressiveness.

Joan King
304 Manor Drive
Sautee, GA 30571

1

King, Joey
Page 1 of 1

PC_83

Dear Mr. Wyka:

I am not able to make the public comment event at Oak Ridge but I urge the US to:

1|1F Comply with it's treaty obligations and eliminate all nuclear weapons from the face of the earth.

Joey B. King
799 Farmingdale Dr
La Vergne TN 37086

Kirby, Julie
Page 1 of 1

PC_1902

Levens, Matthew

From: Julie Parisi Kirby [juliepkirby@earthlink.net]
Sent: Tuesday, February 19, 2008 6:19 PM
To: Complex2030
Subject: NO NEW NUKES!!!!!!!!!!!!

Julie Parisi Kirby
36 Purdy Hollow Road
Woodstock, NY 12498-2224

February 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A 2|5C I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons. It is absolutely insane to even consider creating more nuclear weapons, not to mention hypocritical.

3|1J 4|1K This would only start another nuclear arms race. Our planet is already endangered between global warming and the rogue government in the White House that you people have allowed to remain despite numerous calls for removal.

5|2O I realize that weapons are the number one export of this country and that it's good for business to create war and strife but this has got to change. The weapons industry is going to have to find something saner to create - like solar panels.

6|1B Please!! Do not allow this criminal administration (or any future administration) to build new nuclear weapons and start another arms race. Please!

Sincerely,

Julie Parisi Kirby

1

Kisber, Matt
Page 1 of 1

PC_82

Department of Economic and Community Development
William Snodgrass/Tennessee Tower Building, 11th Floor, 312 8th Avenue North, Nashville, Tennessee 37243
615-741-1888 / FAX: 615-741-7306

Matthew Kisber
Commissioner

Phil Bredesen
Governor

February 8, 2008

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager,
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, D.C. 20585

Dear Mr. Wyka:

1|15A
2|10I
For more than 60 years, the Y-12 National Security Complex in Oak Ridge has been a Center of Excellence in the handling and processing of uranium vital to America's national security. Thousands of proud Tennesseans have devoted their lives to developing the skills necessary to undertake this important work in a productive and cost efficient manner. For that reason, I am writing to express my support for Y-12 NSC's continued role in the defense of our country.

3|3A
4|5C4
5|7N
You have my thanks and the thanks of the people of Tennessee for your efforts to transform the Nuclear Weapons Complex into a safer, more secure and more effective program. It is my belief that Y-12 and the people of Tennessee can play a vital role in that transformation. The availability of the latest generation in high security buildings at Y-12 NSC positions the facility well for the future and the skilled workers at Y-12 are committed to the facility's continued productivity and success. The NNSA's Preferred Alternative continuing the uranium mission of Y-12 has the support of our department and of the people of Tennessee.

Please don't hesitate to contact my office if I can assist you in your very important work.

Thank you for your efforts in behalf of America's security.

Sincerely,

Matt Kisber
Commissioner

cc: NNSA Administrator Thomas P. D'Agostino
NNSA YSO Manager Theodore Sherry

Kishler, Les
Page 1 of 1

PC_1790

Levens, Matthew

From: les kishler [agroecology@aol.con]
Sent: Friday, March 28, 2008 10:48 AM
To: Complex2030
Subject: nuclear problems

les kishler
16420 bonnie lane
los gatos, CA 95032-4715

March 28, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A
I am also opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal.

Sincerely,

les kishler

Klisuric, Tomdog

Page 1 of 1

PC_1687

Levens, Matthew

From: tomdog@earthlink.net
Sent: Saturday, April 05, 2008 1:04 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|3A
2|9B
3|16A
We the People need Jobs and Food. We already have enough weapons to destroy a couple hundred lifetimes and the weapon industry has made enough profits to last a couple hundred lifetimes, as well.
Let's move on to more important things.

Sincerely,
tomdog Klisuric
7627 Westside Hwy
Castle Rock, WA 98611

cc:
Senator Patty Murray
Representative Brian Baird
Senator Maria Cantwell

1

Kloser, Beth

Page 1 of 1

Apr 10 08 02:59p Jvc Midwest 3133455410 PC_902

PC_902

Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

NNSA National Nuclear Security Administration

Written Comment Form

Must be received on or before April 10, 2008.

Dear Mr. Wyka,

I am writing to let you know that I oppose the proposal to rebuild the nuclear weapons complex with new facilities to maintain a permanent stockpile of nuclear weapons.

I oppose this on many levels. First, such an action goes against national and international law. It would violate the Nuclear Non-Proliferation Treaty — which the U.S. signed and agreed to abide by. Secondly, on a moral level it does not seem right, nor does it make sense, to promote economic growth and livelihoods for residents in East Tennessee with jobs whose very purpose is to provide a means to destroy all of humanity. Surely, we can promote economic growth and offer new jobs in a life-giving industry rather than a life threatening one.

1|16A

2|1F

A more secure, peaceful world is achieved through just policies and diplomacy. NOT by the threat of nuclear war. As a registered voter, I ask you not to pursue this proposal, known as Complex Transformation. Do not pursue this proposal in my name, in the name of my country, or in the name of global peace.

Sincerely yours,
Beth A. Kloser (bakloser@yahoo.com)

Please use other side if more space is needed.

Comment forms may be mailed to:
Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Comment forms may be faxed to:
(703) 931-9222
or sent by electronic mail to:
complextransformation@nnsa.doe.gov

You may also submit comments through the project website which can be found at:
http://www.complextransformationspeis.com

Klosky, Linda

Page 1 of 1

PC_602

Levens, Matthew

From: Linda Klosky [lindak@sfcmf.org]
Sent: Monday, March 03, 2008 12:40 PM
To: Complex2030
Subject: Oppose new nuclear weapons projects

Linda Klosky
P.O. Box 1071
Santa Fe, NM 87504-1071

March 3, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|14O 2|16A 3|10B 4|14E 5|5C I am a resident of Santa Fe County, New Mexico and live about 8 miles as the crow flies from the Los Alamos Labs. I oppose pit production for nuclear weapons at the Los Alamos facility or any other facility in the US on ethical, safety and environmental grounds. Los Alamos does not have a good environmental record. Traces of nuclear waste are migrating towards the Rio Grand and underground water supplies, the water I drink and the whole valley draws from.

3|10B (cont) 5|5C (cont) I understand that the Chemistry and Metallurgy Research Replacement (CMRR) project would be able to produce 50 to 80 plutonium pits annually, the first major nuclear warhead production since the end of the Cold War.

6|1J Building this new plant would send a contradictory message to other countries, such as Iran, who may be seeking nuclear weapons. While the U.S. is asking others to forego developing nuclear arsenals, we are simultaneously trying to increase our own capacity to build new nuclear weapons.

7|8A 3|10B (cont) Congress rebuked the Energy Department's last attempts to upgrade the arsenal by defunding the Reliable Replacement Warhead and last year's proposed mega-scale bomb plant. The CMRR project is another irresponsible new program that should be rejected.

Sincerely,

Linda Klosky

1

Klusmire, Leslie

Page 1 of 1

PC_599

Levens, Matthew

From: Leslie Klusmire [leslieak@verizon.net]
Sent: Tuesday, March 25, 2008 12:43 PM
To: 'Leslie Klusmire'; Complex2030
Subject: RE: Request for copy of Complex Transformation EIS

1|2A I have both called and left a message and sent this email. Neither have been acknowledge as received. Can you confirm these documents are being sent to me?

———

From: Leslie Klusmire [mailto:leslieak@verizon.net]
Sent: Monday, March 24, 2008 9:44 AM
To: 'complextransformation@nnsa.gov.usa'
Subject: Request for copy of Complex Transformation EIS

I request a copy of the full set of EIS documents including appendices. My address is:

Leslie Klusmire, AICP, ASLA

P.O. Box 89

Bishop, CA 93514

I'm aware they are available on line and CD and would prefer a paper copy.

Thank you,

Leslie Klusmire

760 872 3806

1

Knoll, Kristie
Page 1 of 1

PC_77

Kristie Knoll
Knoll Farms
12510 Byron Highway
Brentwood, CA 94513-4233

Draft Complex Transformation SPEIS Comments
Mr. Theodore A. Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
Department of Energy/NNSA
1000 Independence Avenue, SW.
Washington, DC 20585

RE: Comments regarding SPEIS, Complex Transformation

Dear Mr. Wyka,

1|16A 2|1J I am among the 79% of Americans who want the U.S. to do more to eliminate nuclear weapons. The Department of Energy should be putting their resources into nuclear cleanup and renewable energy research, not expanding their weapons program. The decision to transform the U.S. nuclear complex must reflect the will of the American people. 3|9B

4|8A I am very disturbed that, despite Congress' recent rejection of the Reliable Replacement Warhead program, the SPEIS still refers to a goal of creating 120-125 new warheads every year. These new warheads are unwanted and unnecessary. A recent report documented that the current U.S. nuclear stockpile will be remain reliable for at least another 70 years. 5|5C.1

6|1C 7|14K 8|14M.3 9|14O 10|9H There is no reason to embark on a costly new program to build unnecessary and unwanted nuclear weapons—especially before congressional and administration mandated nuclear policy reviews are completed. With so many unresolved issues around nuclear waste, storage, employee safety and compensation and popular will for reducing nuclear weapons it makes no sense for U.S. taxpayers to invest in a new generation of nuclear weapons facilities.

11|7J 3|9B (cont.) The New Nuclear Weapons and Complex Transformation program is wasteful, dangerous, and completely unnecessary. Please cancel it and focus the DOE's resources on reducing our nuclear stockpile, cleaning up polluted nuclear sites, and developing renewable energy sources.

Hello!

Sincerely,

Kristie Knoll

Knoop, Mary Ellen
Page 1 of 2

PC_2060

Levens, Matthew

From: meknoop@comcast.net
Sent: Thursday, April 10, 2008 7:10 AM
To: Complex2030
Subject: Draft Complex Transformation SPEIS Comments

From: Mrs. Mary Ellen Knoop meknoop@comcast.net
4712 71st. Street Court NW 253-851-8615
Gig Harbor, WA 98335

To: Mr. Theodore A. Wyka, Complex Transformation Manager
Office of Transformation NA-10.1
D.O.E./NNSA
1000 Independence Ave., SW.
Washington, D.C. 20585

Dear Mr. Wyka:

I wish to comment on the environmental aspects that pertain to the use, properties, and transportation of tritium by the NNSA regarding the Supplemental PEIS. I represent myself in this matter.

1|14O By the word environment, I do not here refer to the environment for tritium, plutonium and uranium which has to do, for example, with R&D, storage, testing, etc. The environment I mean encompasses: the air; water in the ground and streams and seas; Earth as a whole; geography and geology; and also health and safety, homes, schools, churches, stores, parks, recreational facilities, and communities, with all of the services such as transportation, hospitals, businesses and so forth. I also mean pets, farm animals and poultry, gardens for vegetables and flowers, grass, trees, and shrubs; and all wildlife. Water is a vital part in one or many ways of everything on the above lists.

1|14O (cont) It is indeed true that we cannot live without water. And the nuclear weapons program as well as nuclear power plants can not operate without water and tritium - large amounts of tritium, particularly in nuclear weapons production. Therein lies a huge problem for our environment, because tritium IS water, although the tritium atom replaces one of the two hydrogen atoms of the water molecule, making the molecule of water radioactive HTO instead of H2O. Tritium most often takes the liquid form of tritiated water but also can occur as a gas. The trouble is that tritium often leaks as water from nuclear facilities, or is released in its gaseous state as steam, either slowly or in bursts. The bursts are much more dangerous to life, may occur suddenly, and while they may be "required not to exceed federal environmental limits", there is no way for the public to find out about these releases. As well, the government is cooperative with the industry, setting higher safety limits than are wise, so that the industry can "remain in compliance."

But doesn't tritium have a half-life of only 12.3 years? And isn't the emitted radiation weak? also, don't most of us have tritium illuminating the hands of our wrist watches? That makes it safe, right? I mean the government would never allow anything that's harmful to us, our babies, and the environment. Would they?

2|14K Yes, tritium does have low dosage radiation, but its toxic danger to us and to all life is because it so easily incorporates itself into all parts of the body that contain water. It gets into the ground water and into reservoirs.
The gas can also be inhaled and absorbed through the skin, which means that bathing is no longer a healthful soak, and one's lungs will find tritium gas in them via a hot shower. Oh we won't be able to smell or feel it or see it, and some will be breathed out or excreted via the kidneys, but much will become a permanent part of the body. Remember that radiation is cumulative, so that low dose plus low dose plus low dose ad infinitum for those who live nearby a facility or downstream means cancers, genetic mutations, and developmental defects.
That is what happens with radiation exposure. We all do know that.
We as a people are exposed to enough radiation already, including more from the sun each

1

Knoop, Mary Ellen
Page 2 of 2

PC_2060

year, never mind ordinary dental x-rays and the occasional CAT-Scan plus air travel. There is no "safe dose" of tritium.

Tritium is used as part of the triggering mechanism in thermonuclear weapons.
2|14K (cont) Again, it is important to note that very large quantities are used for this purpose. This means that nuclear weapons plants require large amounts of regular water as well as large amounts of tritium. At present, most of the tritium
3|6B R&D operations are at LANL, LLNL, and at SRS. This SPEIS proposes alternative actions regarding tritium R&D. I am concerned about the proposed gas transfer of tritium if the Consolidate Tritium R&D at SRS Alternative is chosen. Both LANL and LLNL are respectfully about two and three thousand miles from SRS. The Consolidate Tritium at LANL Alternative also means gas transfer from LLNL to LANL. With either Alternative, accidents can happen. Tritium gas
can not be detected by the five senses. That could mean huge exposure of part of the population.

4|14N Radiation goes through everything (except lead) and there is no means of protection against a spill once one occurs.
5|16A It is my opinion that this entire project is ill-advised, and will lead to more costly mistakes than we can now imagine. It's senseless because it is burning up money in mega
6|14E2 explosions if used, that will probably cause some nuclear bombs to come our way; plus it
7|9B impoverishes our country by failing to invest in our people instead of this horror of
8|13A technology gone mentally haywire. The environment is a huge concern, especially our drinking water supplies. The Southeast and the Southwest have been suffering very severe droughts and fires. And the NNSA wants to use precious water for making yet more nuclear weapons?

Respectfully,
Mary Ellen Knoop

1|14O (cont) You'd think that common sense would rally us all behind working to clean up our streams, the oceans and ground water, as well as the earth and air. But for many reasons - denial
7|9B that there are problems; the seductive focus on destruction as the way to go; the money to be made; the power of it all; the underlying fact that radiation cannot be felt, smelled, heard, nor seen - all of these perhaps have to do with why this so-called Environmental Impact Statement can be managed in such a way that while asking for public comment on the matter,

Tritium's most common form is tritiated water (HTO), although like H2O it can also be a gas.

2

Knutsen, Henry
Page 1 of 5

PC_1368

Levens, Matthew

From: Henry Knutsen [henry.knutsen@uclalumni.net]
Sent: Sunday, April 27, 2008 3:32 PM
To: Complex2030
Subject: DOE Complex Transformation

Attachments: pat280096283

ag C-T SPEIS
2-08[1].doc (

28 April 2008

Mr. Theodore Wyka
C-T SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Re: Public Comment to the draft Complex Transformation
Supplemental Programmatic Environmental Impact Statement, DOE/EIS-0236-S4

Dear Mr. Wyka,

The Department of Energy (DOE) is proposing Complex Transformation, with a focus for expanding nuclear weapons manufacturing at Los Alamos National Laboratory (LANL).

I live in the town of Dixon, inNorth Central New Mexico, and have been and will be impacted by expanded nuclear weapons manufacturing at LANL through air emissions, discharges to water and burial of waste in the land. I just learned of the transformation complex document and request a 90-day extension of time to provide informed public comments to DOE.

My primary concern at this point is that DOE states “there are no agricultural activities present at LANL, nor are there any prime farmlands in the vicinity.” p. 4-2. For DOE, a “vicinity” or “region of influence” is generally an area within a 50-mile radius of its facility.

DOE defines “prime farmlands” as “land that has the best combination of physical and chemical characteristics for producing food, feed, fiber, forage, oil seed, and other agricultural crops with minimum inputs of fuel, fertilizer, pesticides, and labor, without intolerable soil erosion, as determined by the Secretary of Agriculture (Farmland Protection Act of 1981, 7 CRF 7, paragraph 658).” p. 13-27.

1|14.A.1 The DOE claim that there are no prime farmlands in the vicinity of LANL is false. Before the Atomic Energy Commission arrived on the Pajarito Plateau in 1943, all this land was prime farmland. LANL is located within the bread basket of Northern New Mexico. In recent years there has in fact been a period of reduced agricultural activity in the region. However, today Northern New Mexico is experiencing a vibrant resurgence in agriculture that WILL provide a solution to the food shortages and depleted soils across the United States. The region WILL become a "bread basket" providing fresh, local food products for the entire 4-corners region, and beyond. At a time when growing and transportation costs are skyrocketing with no end in sight, we can ill afford to allow even the slightest risk of contamination of this vital region.

DOE must retract the draft Complex Transformation Supplemental Programmatic Environmental Impact Statement and reassess the LANL impacts to agriculture. Then DOE must submit the

1

Knutsen, Henry
Page 2 of 5

revised draft to the public for review and public comment.

PC_1368

Sincerely,

Henry B. Knutsen
PO Box 118
Dixon, NM 87527-0118

cc: Senator Pete Domenici at (505) 988-6511, fax (505) 988-6514
Senator Jeff Bingaman at (505) 988-6647, fax (505) 992-8435
Representative Tom Udall at tom.udall@mail.house.gov
Representative Heather Wilson at (505) 346-6781, fax (505) 346-6723
Representative Steve Pearce at (505) 522-2219, fax (505) 522-3099
Governor Bill Richardson at (505) 476-2200
President Pro Tempore Tim Jennings at (575) 623-8331, fax (575) 623-9378
House Speaker Ben Lujan at ben.lujan@nmlegis.gov

"A nation that continues year after year to spend more money on military defense than on programs of social uplift is approaching spiritual death." ---Reverend Martin Luther King Jr., 04 April 1967

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_ylt=Ahu06i62sR8HDtDypao8Wcj9tAcJ

2

Knutsen, Henry
Page 3 of 5

PC_1368

28 April 2008

Mr. Theodore Wyka
C-T SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Re: Public Comment to the draft Complex Transformation Supplemental Programmatic Environmental Impact Statement, DOE/EIS-0236-S4

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I live in the town of Dixon, inNorth Central New Mexico, and have been and will be impacted by expanded nuclear weapons manufacturing at LANL through air emissions, discharges to water and burial of waste in the land. **I just learned of the transformation complex document and request a 90-day extension of time to provide informed public comments to DOE.**

My primary concern at this point is that DOE states "there are no agricultural activities present at LANL, nor are there any prime farmlands in the vicinity." p. 4-2. For DOE, a "vicinity" or "region of influence" is generally an area within a 50-mile radius of its facility.

DOE defines "prime farmlands" as "land that has the best combination of physical and chemical characteristics for

Knutsen, Henry
Page 4 of 5

PC_1368

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The DOE claim that there are no prime farmlands in the vicinity of LANL is false. Before the Atomic Energy Commission arrived on the Pajarito Plateau in 1943, all this land was prime farmland. LANL is located within the bread basket of Northern New Mexico. In recent years there has in fact been a period of reduced agricultural activity in the region. However, today Northern New Mexico is experiencing a vibrant resurgence in agriculture that WILL provide a solution to the food shortages and depleted soils across the United States. The region WILL become a "bread basket" providing fresh, local food products for the entire 4-corners region, and beyond. At a time when growing and transportation costs are skyrocketing with no end in sight, we can ill afford to allow even the slightest risk of contamination of this vital region.

DOE must retract the draft Complex Transformation Supplemental Programmatic Environmental Impact Statement and reassess the LANL impacts to agriculture. Then DOE must submit the revised draft to the public for review and public comment.

Sincerely,

Henry B. Knutsen
PO Box 118
Dixon, NM 87527-0118

Knutsen, Henry
Page 5 of 5

PC_1368

cc: Senator Pete Domenici at (505) 988-6511, fax (505) 988-6514
Senator Jeff Bingaman at (505) 988-6647, fax (505) 992-8435
Representative Tom Udall at tom.udall@mail.house.gov
Representative Heather Wilson at (505) 346-6781, fax (505) 346-6723
Representative Steve Pearce at (505) 522-2219, fax (505) 522-3099
Governor Bill Richardson at (505) 476-2200
President Pro Tempore Tim Jennings at (575) 623-8331, fax (575) 623-9378
House Speaker Ben Lujan at ben.lujan@nmlegis.gov

Knutsen, Henry
Page 1 of 2

PC_324

Mr. Theodore A. Wyka
Complex Transformation SPEIS Document Manager
U.S. Department of Energy, NA-10.1
1000 Independence Avenue SW
Washington, DC 20585

HENRY KNUTSEN
P.O. BOX 118
DIXON, NM 87527

Your Additional Comments: MR. WYKA THANK YOU FOR COMING TO ESPANOLA, NM, FOR THE RECENT HEARING. AS YOU HEARD FROM SO MANY OF THE SPEAKERS, YOU MUST EXTEND THE COMMENT PERIOD TO ALLOW SOME OF THE MOST AFFECTED PEOPLE TO VOICE THEIR OPINIONS. ALTHOUGH THIS HEARING WAS WELL ATTENDED, THE PUBLIC ANNOUNCEMENTS WERE INEFFECTIVE AT REACHING MANY WHO SHOULD HAVE BEEN THERE. I WOULD ALSO REQUEST AT LEAST 1 ADDITIONAL HEARING AIMED AT, AND TRANSLATED FOR, THE INDIGENOUS POPULATIONS. THANK YOU AGAIN, /s/

1|2E.1

2|2E.2

Please print your name and address for DOE to respond to your comments

Knutsen, Henry
Page 2 of 2

90-DAY EXTENSION OF TIME

FOR THE COMMENT PERIOD ON THE DRAFT COMPLEX TRANSFORMATION SPEIS

www.nnsa.doe.gov/complextransformation.htm
comments currently due April 10, 2008

Kochendorfer, John

Page 1 of 1

PC_2015

Levens, Matthew

From: john kochendorfer [grandpakoch@hotmail.com]
Sent: Wednesday, April 30, 2008 2:07AM
To: Complex2030
Subject: dept of energy going to flood ny:

john kochendorfer
3056 brighton 13st
brighton geach brooklyn, NY 11235-5635

April 30, 2008

Complex Transformation Department of Energy

1|20 Complex Transformation Department of Energy:

hey fools do some homework
when we nuked japan the ionic or electron flux traveled along the ionosphere to the north pole it was observed by military officials to have turned tens of thousands of acres of ice and snow to boiling water and steam and the nukes we have now are what a hundred times more powerful if ya gonna f up the ioncsphere do it with your haarp tesla pulse that way we can save some money

yours in poverty

john kochendorfer
1 347 302 2843

Kochert, Marlene

Page 1 of 1

PC_633

Levens, Matthew

From: Marlene Kochert [mlkochert@yahoo.com]
Sent: Sunday, March 16, 2008 4:23 PM
To: Complex2030
Subject: "No!" to nuclear weapons!

Marlene Kochert
P. O. Box 82
Tohatchi, NM 87325-0082

March 16, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

I live in New Mexico and have lived in the midWest and don't want any nuclear bomb facilities near where I live.

I live in the United States and our people are to stand for peace and building up all that is good, not war and destruction.

I live on this planet earth with billions of other human beings and even the talk of nuclear weapons is against all that should be bringing us together in cooperation and unity for the health and well-being of each person.

1|16A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

2|8A Congress rebuked the Energy Department's last attempts to upgrade the arsenal by defunding the Reliable Replacement Warhead and last year's proposed mega-scale bomb plant. The CMRR project is another irresponsible new program that should be rejected.

Sincerely,

Marlene Kochert

1

Kofski, James
Page 1 of 1

PC_1088

Levens, Matthew

From: James Kofski [jkofski@maryknoll.org]
Sent: Thursday, March 27, 2008 3:55 PM
To: Complex2030
Subject: Reject "Complex Transformation" plan to build nuclear weapons

James Kofski
Maryknoll Seminary
Maryknoll, NY 10545-0305

March 27, 2008

Theodore A Wyka
Complex 2030 SEIS Document Manager
Office of Transformation, U.S. Department of Energy, NA-10.1 1000 Independence Avenue, SW.
Washington, DC 20585

Dear Theodore Wyka:

1|16A The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal.

1|16A (cont) Dear Mr. Wyka,

2|3A The U.S. does not need new nuclear weapons. We should be working instead for disarmament.

3|1J Developing a new generation of nukes could only encourage a nuclear arms race. It is

4|14M detrimental both to the economy and to security, and we still have no satisfactory means of disposing of nuclear waste.

5|9B The U.S. could use the funds more effectively for humanitarian programs at home and abroad.

3|1J (cont) By building up its nuclear arsenal right now, the US is essentially telling the world, "Do as I say, not as I do."

Sincerely,

Rev. James Kofski

1

Kohler, Bruce
Page 1 of 1

PC_79

Bruce E. Kohler
Apt. 110
193 Welles St.
Glastonbury, CT 06033-2064

Draft Complex Transformation SPEIS Comments
Mr. Theodore A. Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
Department of Energy/NNSA
1000 Independence Avenue, SW.
Washington, DC 20585

RE: Comments regarding SPEIS, Complex Transformation

Dear Mr. Wyka,

1|16A I am among the 79% of Americans who want the U.S. to do more to eliminate nuclear weapons. The Department of Energy should be putting their resources into nuclear cleanup and renewable

2|9B energy research, not expanding their weapons program. The decision to transform the U.S. nuclear complex must reflect the will of the American people.

3|8A I am very disturbed that, despite Congress' recent rejection of the Reliable Replacement Warhead

4|3A program, the SPEIS still refers to a goal of creating 120-125 new warheads every year. These new warheads are unwanted and unnecessary. A recent report documented that the current U.S.

5|5C1 nuclear stockpile will be remain reliable for at least another 70 years.

6|1C There is no reason to embark on a costly new program to build unnecessary and unwanted

7|14M nuclear weapons—especially before congressional and administration mandated nuclear policy

8|7F reviews are completed. With so many unresolved issues around nuclear waste, storage,

9|9H employee safety and compensation and popular will for reducing nuclear weapons it makes no sense for U.S. taxpayers to invest in a new generation of nuclear weapons facilities.

1|16A (c) The New Nuclear Weapons and Complex Transformation program is wasteful, dangerous, and

10|7J completely unnecessary. Please cancel it and focus the DOE's resources on reducing our nuclear

2|9B (c) stockpile, cleaning up polluted nuclear sites, and developing renewable energy sources.

Sincerely,

Bruce E. Kohler

Bruce E. Kohler

11|1L How can we demand other countries not create

12|1J Nuclear weapons when we are adding to our own Stockpile?

Kolman, Sam

Page 1 of 1

PC_1673

Levens, Matthew

From: samkolman@msn.com
Sent: Saturday, April 05, 2008 4:31 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|13A1 Nuclear weapons are not a means of achieving peace. They are not a deterrent to war but rather motivate terrorist. Nuclear weapons are ineffective and unusable in todays battles.

Sincerely,
Sam Kolman
5670 Iris Rd NE
Rio Rancho, NM 87144

cc:
Senator Pete Domenici
Senator Jeff Bingaman
Representative Tom Udall

1

Koopman, Elizabeth

Page 1 of 1

PC_1971

Levens, Matthew

From: Elizabeth Koopman [jasperbeach@verizon.net]
Sent: Wednesday, April 30, 2008 5:25 PM
To: Complex2030
Subject: US Expansion of nuclear weapon development

Elizabeth Koopman
13801 York Road, Apt. S 201
Cockeysville, MD 21030-1864

April 30, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

To my valued voices in the US Congress:

The threat of nuclear warfare is all around us prompting complex decisions, especially in the US Congress.

1|16A Please do all you can to block the current administration's proposals to expand plutonium development.

2|1L Please do all you can to expand international treaties, multinational talks, and other curbs to potential nuclear weapon development.

Peace and life on our planet depend on your wisdom and courage to act.

Thank you for caring and acting wisely!

Sincerely,

Elizabeth J. Koopman
410-771-1243

1

Korb, Maris
Page 1 of 1

PC_624

Levens, Matthew

From: Maris Stella Korb [socialjustice@cableone.net]
Sent: Monday, March 17, 2008 4:42 PM
To: Complex2030
Subject: Complex Transformation

Maris Stella Korb
1101 32nd Ave. S.
Fargo, ND 58103-6036

March 17, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

I have written so often about being opposed to any advancement of nuclear weapons, it would seem no longer necessary. Yet since the "Complex Transformation" is the subject of hearings throughout the country I feel it necessary to write yet again.

1|16A NO MONEY FOR THE UPGRADING, REFURBISHING, REVISION OR TRANSFORMATION OF NUCLEAR WEAPONS, PLEASE! These weapons should only be destroyed!

Thank you!

Sincerely,

Maris Stella Korb

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Korb, Maris
Page 1 of 1

PC_696

Levens, Matthew

From: Presentation Peace & Justice [socialjustice@cableone.net]
Sent: Thursday, February 14, 2008 6:05 PM
To: Complex2030
Subject: "Complex Transformation"

Dear Mr. Wyka:

1|16A I am writing to make known my strong opposition to the furtherance of "Complex Transformation" for the following reasons:
2|1F 1) It is in violation of the Non-Proliferation Treaty which we insist other countries uphold.
3|9B 2) It wastefully spends millions/billions of dollars which could be more wisely and
4|9H humanely spent on providing education, health care, and housing for the betterment of our own citizens.
5|13A1 3) A new weapons complex makes our country more vulnerable to foreign attack because we
6|1J project a threatening challenge to the rest of the world, and defy any attempt to be held accountable.
5|13A1 4) It strengthens a faulty mind-set that maintains that those who disagree with us are
(cont) intentionally planning to harm us and we must therefore be at all times ready to attack (pre-emptively if possible) with deadly force.
6|1J 5) It "transforms" us; "shrinks" us into less than who we are, incapable of developing
(cont.) relationships of cooperation based on mutual understanding and common interests with people of other countries and cultures.
6|1J 6) It flies in the face of those who speak with wisdom and experience on the issue and
(cont.) say it is time to begin to pursue nuclear disarmament.
7|20 Gorbachev, Kissinger, Schultz and Nunn are some of these people.

1|16A All of these reasons are insulting, demeaning and actually dangerous to us as American
(cont) citizens. I strongly urge you to listen carefully to the feedback you receive concerning this project, use your position responsibly and work to refurbish the human relations skills of people in power; not refurbish bombs which are capable of destroying civilization itself.

Thank you for giving these views some reflective thought.

Sincerely,
Sr.. Maris Stella Korb
Presentation Peace & Justice
3001 11th St. South
Fargo, ND 58103
701- 235-8246

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Korfhage, David

Page 1 of 1

PC_1321

Levens, Matthew

From: David Korfhage [drkorfhage@gmail.com]
Sent: Tuesday, April 29, 2008 10:33 PM
To: Complex2030
Subject: Nuclear weapons program

David Korfhage
58 Tuxedo Rd.
Montclair, NJ 07042-5042

April 29, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|1J I am strongly opposed to the Bush administration's proposal to restart out nuclear weapons program, by building and modifying nuclear plants across the country. As we call upon other countries to abandon nuclear weapons, we should not be moving in the other direction. Instead, we should follow our own advice, and move towards nuclear abolition.

Sincerely,

David Korfhage

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Koss-Meyer, Barbara

Page 1 of 1

PC_2109

Levens, Matthew

From: Sonny & Barb [bkoss@wowway.com]
Sent: Thursday, April 10, 2008 9:08 PM
To: Complex2030
Subject: Nuclear weapons

Dear Mr. Wyka,

1|16A; 2|1F I have been reading about the government's plan to increase nuclear weapons. I feel this is a dangerous mistake. I encourage an end to the U.S. nuclear surge, and call on our government to engage, in good faith, negotations leading to the global elimation of nuclear weapons as the Nuclear Non Proliferation Treaty requires.

Sincerely,
Barbara C. Koss-Meyer

Kosters, Jane

Page 1 of 1

PC_1764

Levens, Matthew

From: Jane Kosters [jkosters@lorettocommunity.org]
Sent: Wednesday, April 02, 2008 4:40 PM
To: Complex2030
Subject: NNSA's plan

Dear Mr. Theodore Wyka:

1|16A Please register my strong opposition to PEIS! Clearly the purpose of "Complex Transformation" is to increase 4 fold the capacity to produce plutonium triggers for nuclear weapons. The public is being mislead as to the real reason for this plan by using the reduction of the existing stockpile as the purpose. Why expand when the WORLD is about abolishing nuclear weapons? Why update plutonium triggers when they do not deteriorate in 100 years? Our tax money is necessary for PEACE. This complex transformation is not the course to pursue for any positive peaceful negotiating position. Update, yes, destroy nuclear weapons now! Thank you for considering my efforts to stop PEIS.

Jane Kosters

--
I am using the free version of SPAMfighter for private users.
It has removed 2963 spam emails to date.
Paying users do not have this message in their emails.
Get the free SPAMfighter here: http://www.spamfighter.com/len

--
I am using the free version of SPAMfighter for private users.
It has removed 2963 spam emails to date.
Paying users do not have this message in their emails.
Get the free SPAMfighter here: http://www.spamfighter.com/len

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Kotowski, Sheri

Page 1 of 1

PC_737

Levens, Matthew

From: Sheri Kotowski [serit@cybermesa.com]
Sent: Monday, February 18, 2008 3:40 PM
To: Complex2030
Cc: Gloria_Zamora@bingaman.senate.gov; Epstein, Jonathan <Alert>; michele.jacquez-ortiz@mail.house.gov; sarah.cobb@mail.house.gov; MattR.Miller@mail.house.gov; veronica_rodriguez@domenici.senate.gov
Subject: Request for Española hearing and Extension of Time

To: <complextransformation@nnsa.doe.gov>
Cc: "Zamora, Gloria (Bingaman)" <Gloria_Zamora@bingaman.senate.gov>,
"Epstein, Jonathan (Bingaman)" <Jonathan_Epstein@bingaman.senate.gov>,
Michele Jacquez-Ortiz <michele.jacquez-ortiz@mail.house.gov>,
<sarah.cobb@mail.house.gov>, "Miller, Matt R" <MattR.Miller@mail.house.gov>,
<veronica_rodriguez@domenici.senate.gov>

Conversation: Request for Espanola hearing & Extension of Time
Subject: Request for Espanola hearing & Extension of Time

Theodore A. Wyka
Complex Transformation SPEIS Document Manager Office of Transformation, NA-10.1 US
Department of Energy/NNSA 1000 Independence Avenue SW Washington, DC 20585

Dear Mr. Wyka,

1|2E.2 The Embudo Valley Environmental Monitoring Group joins with a growing number of individuals, elected officials and non-governmental organizations in Northern New Mexico who are requesting a public hearing for the draft Complex Transformation SPEIS, DOE/EIS-0236-S4, in Española, New Mexico. In order to more fairly provide all communities downwind from Los Alamos National Laboratory (LANL) public comment, we recommend changing the ³second² Los Alamos hearing, scheduled for Wednesday, March 12, 2008 from 6 to 10, to an Española venue.

2|2E.1 Making the extra trip to Los Alamos is difficult for many that are already impacted by LANL activities. As reported in the draft Complex Transformation SPEIS, the minority and low-income population surrounding LANL is ³57 percent within the census tracts containing LANL. Low-Income population:
9.3 percent of ROI [region of influence - 50 mile radius of LANL]." p. S-77.

3|14J With local gasoline prices continuing to be up to $3.19 a gallon, it is difficult for many to travel the additional 35 miles from Española to Los Alamos, making this a 60 to 100 mile round trip in the night time to make public comments. The lack of a DOE hearing in the downwind community of Española, New Mexico raises considerable environmental justice issues and appears to silence a very important voice.

4|2E Additionally, EVEMG requests a 90-day extension of time to provide comments to DOE about the draft Complex Transformation SPEIS. Since the beginning of the year, non-governmental organizations in Northern New Mexico have been overly burdened with providing comments state and federal permits, including the draft New Mexico Hazardous Waste Act permits for both LANL and Sandia National Laboratories and the Environmental Protection Agency draft individual storm water permit for LANL. A public hearing on the draft individual storm water permit is scheduled for March 4, and many are preparing for this hearing also. Your cooperation would be greatly appreciated.

Sincerely,

Sheri Kotowski
Embudo Valley Environmental Monitoring Group PO Box 291
Dixon, NM 87527

1

Kotowski, Sheri
Page 1 of 3

PC_736

Levens, Matthew

From: Sheri Kotowski [serit@cybermesa.com]
Sent: Thursday, February 21, 2008 4:34 PM
To: Complex2030
Cc: Gloria_Zamora@bingaman.senate.gov; michele.jacquez-ortiz@mail.house.gov; sarah.cobb@mail.house.gov; MattR.Miller@mail.house.gov; veronica_rodriguez@domenici.senate.gov; Epstein, Jonathan <Alert>
Subject: Re: Request for Española hearing and Extension of Time

February 21, 2008

Subject: 2030 Public Hearings

Mr. Wyka,

Thank you for your response. I am sure that I did not clearly communicate the necessity for fair accessibility to public hearings for communities surrounding LANL. So, I would like to get to the heart of the issue. These are "public" hearings not "LANL" hearings. Having two sessions in a township the size of Los Alamos is catering only to LANL and not the Region of Influence (ROI) and diverse circumstances of surrounding communities. It is clearly a discrimination against those not employed by LANL to have two hearings in Los Alamos. This additional hardship of time and expense on those in the valley and outlying concerned communities, still well within the ROI can be easily resolved by providing a public hearing at a venue in Española, NM.

1|2E.2 Issues of expanded operations will effect the lives of future generations and people whose families have been in this area for decades and millennia.
2|14J There are many issues pertaining to water usage, water quality, air quality and issues of emergency management and preparedness to name a few. These are issues of tremendous importance because of environmental impacts felt in particular by land based and
3|2E traditional communities. When activities such as a plutonium pit factory are proposed, all communities that will be effected by this operation must have a fair chance to speak their opinion.
In a case such as this, people must have an equitable opportunity to come face to face with DOE and their communities and state concerns about their collective future. It is extremely disrespectful to the people of Northern New Mexico to be further isolated in this way and told to sit at home and
write a letter.

Again, we request that a public hearing be provided at a venue in Española, NM.

Sheri Kotowski

Embudo Valley Environmental Monitoring Group PO Box 291 Dixon, NM 87527
505 579 4076

Ms. Kotowski
> Thank you for your email. I understand your concern about the drive.
> Even though we have 19 public hearings scheduled (3 in the Los Alamos
> area), this is just one means for the public to provide comments.
> Comments can also be provided via regular mail, email
> (complextransformation@nnsa.doe.gov), or fax (703-931-9222). All comments, however received, will be given equal weight.
> These comments will all be evaluated both individually and
> collectively, and we will take the appropriate action after
> considering these comments which may include modifying the
> alternatives; supplementing, improving, or modifying the analyses; and making factual corrections.
>

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Kotowski, Sheri
Page 2 of 3

PC_736

> We have provided a 90-day comment period that is twice what is
> required in the National Environmental Policy Act regulations.
> Because of the importance we place on public comments, NNSA will
> consider comments received after April 10, 2008, to the extent that we
> can as we prepare the final document. During public scoping period,
> comments were included and considered that were received several months after the closing data.
>
> Thank you
> Ted Wyka
> NNSA Complex Transformation Document manager
>
> -----Original Message----
> From: Sheri Kotowski [mailto:serit@cybermesa.com]
> Sent: Monday, February 18, 2008 3:40 PM
> To: Complex2030
> Cc: Gloria_Zamora@bingaman.senate.gov; Epstein, Jonathan <Alert>;
> michele.jacquez-ortiz@mail.house.gov; sarah.cobb@mail.house.gov;
> MattR.Miller@mail.house.gov; veronica_rodriguez@domenici.senate.gov
> Subject: Request for Española hearing and Extension of Time
>
> To: <complextransformation@nnsa.doe.gov>
> Cc: "Zamora, Gloria (Bingaman)" <Gloria_Zamora@bingaman.senate.gov>,
> "Epstein, Jonathan (Bingaman)" <Jonathan_Epstein@bingaman.senate.gov>,
> Michele Jacquez-Ortiz <michele.jacquez-ortiz@mail.house.gov>,
> <sarah.cobb@mail.house.gov>, "Miller, Matt R"
> <MattR.Miller@mail.house.gov>,
> <veronica_rodriguez@domenici.senate.gov>
>
> Conversation: Request for Espanola hearing & Extension of Time
> Subject: Request for Espanola hearing & Extension of Time
>
> Theodore A. Wyka
> Complex Transformation SPEIS Document Manager Office of
> Transformation,
> NA-10.1 US Department of Energy/NNSA 1000 Independence Avenue SW
> Washington, DC 20585
>
> Dear Mr. Wyka,
>
> The Embudo Valley Environmental Monitoring Group joins with a growing
> number of individuals, elected officials and non-governmental
> organizations in Northern New Mexico who are requesting a public
> hearing for the draft Complex Transformation SPEIS, DOE/EIS-0236-S4,
> in Española, New Mexico. In order to more fairly provide all
> communities downwind from Los Alamos National Laboratory (LANL) public
> comment, we recommend changing the ³second² Los Alamos hearing,
> scheduled for Wednesday, March 12, 2008 from 6 to 10, to an Española venue.
>
> Making the extra trip to Los Alamos is difficult for many that are
> already impacted by LANL activities. As reported in the draft Complex
> Transformation SPEIS, the minority and low-income population
> surrounding LANL is ³57 percent within the census tracts containing LANL. Low-Income population:
> 9.3 percent of ROI [region of influence - 50 mile radius of LANL]." p. S-77.
> With local gasoline prices continuing to be up to $3.19 a gallon, it
> is difficult for many to travel the additional 35 miles from Española
> to Los Alamos, making this a 60 to 100 mile round trip in the night
> time to make public comments. The lack of a DOE hearing in the
> downwind community of Española, New Mexico raises considerable
> environmental justice issues and appears to silence a very important voice.
>
> Additionally, EVEMG requests a 90-day extension of time to provide
> comments to DOE about the draft Complex Transformation SPEIS. Since
> the beginning of the year, non-governmental organizations in Northern
> New Mexico have been overly burdened with providing comments state and

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Kotowski, Sheri
Page 3 of 3

PC_736

> federal permits, including the draft New Mexico Hazardous Waste Act
> permits for both LANL and Sandia National Laboratories and the
> Environmental Protection Agency draft individual storm water permit
> for LANL. A public hearing on the draft individual storm water permit is scheduled for
March 4, and many are preparing for this hearing also.
> Your cooperation would be greatly appreciated.
>
> Sincerely,
>
> Sheri Kotowski
> Embudo Valley Environmental Monitoring Group PO Box 291 Dixon, NM
> 87527
>
>
>
>

3

Kotowski, Sheri
Page 1 of 1

PC_737

Levens, Matthew

From: Sheri Kotowski [serit@cybermesa.com]
Sent: Monday, February 18, 2008 3:40 PM
To: Complex2030
Cc: Gloria_Zamora@bingaman.senate.gov; Epstein, Jonathan <Alert>; michele.jacquez-ortiz@mail.house.gov; sarah.cobb@mail.house.gov; MattR.Miller@mail.house.gov; veronica_rodriguez@domenici.senate.gov
Subject: Request for Española hearing and Extension of Time

To: <complextransformation@nnsa.doe.gov>
Cc: "Zamora, Gloria (Bingaman)" <Gloria_Zamora@bingaman.senate.gov>,
"Epstein, Jonathan (Bingaman)" <Jonathan_Epstein@bingaman.senate.gov>,
Michele Jacquez-Ortiz <michele.jacquez-ortiz@mail.house.gov>,
<sarah.cobb@mail.house.gov>, "Miller, Matt R" <MattR.Miller@mail.house.gov>,
<veronica_rodriguez@domenici.senate.gov>

Conversation: Request for Espanola hearing & Extension of Time
Subject: Request for Espanola hearing & Extension of Time

Theodore A. Wyka
Complex Transformation SPEIS Document Manager Office of Transformation, NA-10.1 US
Department of Energy/NNSA 1000 Independence Avenue SW Washington, DC 20585

Dear Mr. Wyka,

1|2E.2 The Embudo Valley Environmental Monitoring Group joins with a growing number of individuals, elected officials and non-governmental organizations in Northern New Mexico who are requesting a public hearing for the draft Complex Transformation SPEIS, DOE/EIS-0236-S4, in Española, New Mexico. In order to more fairly provide all communities downwind from Los Alamos National Laboratory (LANL) public comment, we recommend changing the ³second² Los Alamos hearing, scheduled for Wednesday, March 12, 2008 from 6 to 10, to an Española venue.

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9.3 percent of ROI [region of influence - 50 mile radius of LANL]." p. S-77.

3|14J With local gasoline prices continuing to be up to $3.19 a gallon, it is difficult for many to travel the additional 35 miles from Española to Los Alamos, making this a 60 to 100 mile round trip in the night time to make public comments. The lack of a DOE hearing in the downwind community of Española, New Mexico raises considerable environmental justice issues and appears to silence a very important voice.

4|2E Additionally, EVEMG requests a 90-day extension of time to provide comments to DOE about the draft Complex Transformation SPEIS. Since the beginning of the year, non-governmental organizations in Northern New Mexico have been overly burdened with providing comments state and federal permits, including the draft New Mexico Hazardous Waste Act permits for both LANL and Sandia National Laboratories and the Environmental Protection Agency draft individual storm water permit for LANL. A public hearing on the draft individual storm water permit is scheduled for March 4, and many are preparing for this hearing also. Your cooperation would be greatly appreciated.

Sincerely,

Sheri Kotowski
Embudo Valley Environmental Monitoring Group PO Box 291
Dixon, NM 87527

1

Kotowski, Sheri
Page 1 of 11

PC_358

April 30, 2008

By email to: complextransformation@nnsa.doe.gov

Mr. Theodore Wyka
C-T SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Re: Public Comments about the draft Complex Transformation Supplemental Programmatic Environmental Impact Statement, DOE/EIS-0236-S4

Dear Mr. Wyka:

Concerned Citizens for Nuclear Safety (CCNS) and the Embudo Valley Environmental Monitoring Group (EVEMG) provide the following general and specific public comments to the Department of Energy about the draft Complex Transformation Supplemental Programmatic Environmental Impact Statement" (C-T SPEIS). We do not support the draft C-T SPEIS proposal. 1|16A1

In order to assure compliance with the National Environmental Policy Act (NEPA), we renew our request for a 90-day extension of time to provide comments due to increased public awareness of the DOE proposal in Northern New Mexico. 40 CFR §1500.1(b). This section requires that "environmental information is available to public officials and citizens before decisions are made and before actions are taken." CCNS, EVEMG and other non-governmental organizations in Northern New Mexico need the additional time to provide educational materials to surrounding communities and gather informed public comments to submit to DOE. 2|2E1

Lack of Cumulative Impact Analysis for Three DOE Sites in New Mexico Involved in the draft C-T SPEIS Proposal

In New Mexico, transformation of the complex means expanding the manufacturing capabilities and building new facilities at ***Los Alamos National Laboratory (LANL)*** to produce more plutonium pit "triggers" for nuclear warheads. LANL is one of the key facilities for DOE's proposed transformation. 3|14.0.1

At ***Sandia National Laboratory (SNL)*** in Albuquerque, DOE proposes to consolidate test facilities for the performance of nuclear weapons in extreme environments (e.g.,

Kotowski, Sheri
Page 2 of 11

radiation and temperatures) and consolidate all design and engineering responsibility for non-nuclear weapon components from its sister laboratory in Livermore, California.

Finally, DOE proposes to close its site for flight-testing nuclear gravity bombs in Nevada and transfer those activities to the ***White Sands Missile Range (WSMR).*** 3|14.O.1 (cont)

DOE did not conduct the proper analysis about direct and indirect effects and impacts of the proposal at the three DOE sites in New Mexico. DOE is required to examine the effects and impacts of the proposal, including ecological, aesthetic, historic, cultural, economic, social, or health. 40 CFR §1502.16. Further, DOE is required to examine cumulative impacts that "can result from individually minor but collectively significant actions taking place over a period of time." 40 CFR §1508.7.

- For example, LANL and Sandia National Laboratory are located within 60 miles of each other. DOE did not assess the impacts of operations at both LANL and Sandia in the overlapping impact areas, which includes Land Grants and Pueblos.
- Further, Sandia and White Sands are located within 80 miles of each other. DOE did not assess those overlapping impacts either.
- Nor did DOE look at the impacts of all three operating sites located along the Rio Grande corridor. This corridor is the life artery of New Mexico as prime farmland. It is also a major flyway for migratory birds, including the endangered whooping crane.
- Because of the close proximity of the three sites in New Mexico, it is possible for a person or wildlife to be impacted by operations at all three sites on the same day within the Rio Grande corridor.

But DOE has not conducted a cumulative impact analysis for the three sites along the Rio Grande corridor in New Mexico. This flaw in the overall analysis requires DOE to retract the draft C-T SPEIS, conduct the effects, impacts and cumulative analyses and resubmit the proposal to the public for review and comment.

Lack of Analysis of Compliance with the Nuclear Non-Proliferation Treaty
C-T SPEIS Proposal is Premature

DOE received more than 33,000 public scoping comments about what was then called the "Complex 2030" proposal. Over 90% of those comments requested analysis of a nuclear weapons complex where the U.S. complies with the Nuclear Non-Proliferation Treaty (NPT). 4|1C

DOE rejected the request, saying, "Unless and until there are significant changes in national security policy, NNSA is required to design, produce, and maintain the nuclear weapons stockpile pursuant to requirements established by the President and funded

Kotowski, Sheri
Page 3 of 11

by Congress." p. S-8.

4|1C (cont)

But the draft C-T SPEIS is ***premature*** because the policy driver for the "transformation" is the outdated Bush Administration's 2001 Nuclear Posture Review.

Further, the Fiscal Year 2008 Defense Authorization Act requires the formation of a bi-partisan commission appointed by the Senate and House Armed Services Committees that is required to issue a report by December 1, 2008. The commission is required to recommend the number of nuclear weapons needed, the size of the nuclear weapons complex necessary to support that number and assess the role that nonproliferation programs play in national security. National Defense Authorization Act for Fiscal Year 2008, §1062.

The law also requires the incoming president to complete a new Nuclear Posture Review in 2009. The law states: "It is the sense of Congress that the Nuclear Posture Review conducted under this section should be used as a basis for establishing future United States arms control objectives and negotiating positions." Id., §1070.

It makes no sense for a provocative and very expensive proposal for complex transformation to proceed before a new Nuclear Posture Review is completed. The draft EIS must be withdrawn until the report of the bi-partisan commission is released and a new Nuclear Posture Review is completed in 2009.

DOE's Four Alternatives and the Need for the Fifth Alternative, a "Weapons Complex that Produces Zero Bombs: A NPT-Compliant, No Production Alternative"

DOE is proposing four alternatives, all of which impact public health and the environment in New Mexico. Under the Bush Administration's proposal, LANL will remain the nation's only producer of plutonium pit "triggers" for nuclear warheads.

5|7.O1

However, the proposed mission would be expanded from 20 pits per year (ppy) to up to 80. An even more extreme alternative under consideration calls for the production of up to 200 pits per year. The proposed alternatives are:

1. The **No Action Alternative** allows for continuation of the status quo. At LANL, this means producing 20 ppy.

2. The **Distributed Centers of Excellence (DCE)** would take place at two or three separate sites and DOE would continue its plutonium, uranium and weapon assembly/disassembly operations. This alternative includes the construction and operation of a **consolidated plutonium center (CPC)** for manufacturing 125 to 200 ppy.

Kotowski, Sheri
Page 4 of 11

5|7.O1 (cont)

3. The **Consolidated Centers of Excellence (CCE)** would take place at one or two separate sites and DOE would continue its plutonium, uranium and weapon assembly/disassembly operations. Using one site is called the **consolidated nuclear production center (CNPC)** option. The two-site option is called the **consolidated nuclear centers (CNC)**.

4. The **Capability-Based Alternative** is for "operation of a Complex that would support stockpiles smaller than required to meet anticipated national security needs." That statement is a huge pre-judgment given the requirements for the bi-partisan review and a new Nuclear Posture Review, both of which will address the number of nuclear weapons needed. Additionally, this alternative assumes that LANL's plutonium pit production is expanded from 20 to 50 ppy.

DOE must consider a fifth alternative, a "The Weapons Complex that Produces Zero Bombs: A NPT-Compliant, No Production Alternative." This alternative would address the:

- Radioactive, toxic and hazardous waste problems
- Dismantlement of nuclear weapons
- Security of the plutonium, uranium and tritium used in nuclear bombs and require placement under international monitoring and administrative control
- Production of high explosives and open-air explosions, detonations and burning of these materials
- Decontamination, decommissioning and environmental restoration of flight test sites for nuclear weapons delivery systems, hydrodynamic test facilities and major environmental test facilities for nuclear weapons

General Comments

Congress must change the mission of the DOE to enhance its non-proliferation and basic science work; create cleanup, restoration and remediation technologies that minimize impacts of contaminants to the air, soil, water and public and environmental health; and focus on research and development into renewable energies.

Lack of Environmental Justice Analysis

6|14.J.4

DOE omitted assessing the environmental justice impacts of the C-T SPEIS proposal for operations at its three sites in New Mexico. DOE must access the environmental justice and cumulative impacts of the three DOE facilities located along the Rio Grande Corridor in a supplemental *draft* C-T SPEIS. The public must have the opportunity to provide comments before the C-T SPEIS is finalized.

There Are Agricultural Activities Present in the Vicinity of the Three DOE Sites in

Kotowski, Sheri
Page 5 of 11

New Mexico Involved in the C-T SPEIS Proposal

DOE first states "there are no agricultural activities present at LANL, nor are there any prime farmlands in the vicinity." p. 4-2.

Then DOE explains that residents of San Ildefonso Pueblo live immediately east of LANL and that "land use … is a mixture of residential use, gardening and farming, cattle grazing, hunting, fishing, food and medicinal plant gathering, and firewood production, along with general cultural and resource preservation." p. 4-5.

7|14A1 DOE must recognize that there are agricultural activities in the vicinity of LANL and conduct a proper analysis as required by NEPA. The "New Mexico Agricultural Statistics 2000" states "New Mexico's agricultural industry entered the 21st century by setting a cash receipts record of $2.1 billion for the state's farmers and ranchers. This industry remains important to the state's economy."

The 2000 statistical data ranked the Cash Receipts for All Farm Commodities, excluding livestock grazing, by County. The counties surrounding the three DOE sites were ranked in 2000 as follows:

New Mexico County	Rank in 2000	All Farm Commodities
Bernalillo	14	$ 34,095,000
Catron	30	$ 13,393,000
Doña Ana	2	$279,961,000
Lincoln	21	$ 22,046,000
Otero	26	$ 18,015,000
Rio Arriba	24	$ 19,548,000
Sandoval	27	$ 15,598,000
Santa Fe	19	$ 24,033,000
Sierra	12	$ 47,650,000
Socorro	10	$ 51,719,000
Taos	32	$ 8,837,000
		$534,895,000

The total amount for the counties surrounding the three DOE sites is about 1/4 of state's agricultural cash receipts for 2000.

Further, we refer DOE to the United States Department of Agriculture, New Mexico Agricultural Statistics Service in Las Cruces, New Mexico. Their phone number is (505) 522-6023 and their website is www.nass.usda.gov/nm. A description of the work of the New Mexico Field Office is found below:

Kotowski, Sheri
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"The New Mexico Field Office is one of 46 field offices of the USDA's National Agricultural Statistics Service (NASS). The field office is located in Las Cruces and operates under a cooperative agreement with the New Mexico Department of Agriculture (NMDA).

7|14.A1 (cont) "Agriculture and New Mexico are synonymous terms. Early inhabitants of the state planted and harvested corn as early as 4,000 BC. Primitive irrigation systems were created by 2300 BC and some 25,000 acres of land was under irrigated cultivation almost 1,000 years ago. Crops then consisted of corn, squash, pumpkins, onions, mustard, potatoes, and cotton.

"During the 1500's, Spanish explorers and colonists introduced new crops and livestock into the area. The Spaniards brought alfalfa, wheat, fruit trees, sugarcane, grapes, chile, legumes, and melons. Cattle, sheep, goats, hogs, and horses made up a livestock industry that started a full generation before Plymouth Rock and the Pilgrims became important to U.S. history.

"Agriculture continues to be a major contributor to the State's economy with the livestock industry accounting for over 76% of the agricultural cash receipts. Milk receipts and cattle sales dominate the livestock cash receipts. Alfalfa hay, pecans, greenhouse products, corn silage and chile account for the largest portion of the crop cash receipts.

"New Mexico led the nation in the production of chile and summer onions in 2005. Milk production, pecans, and valencia peanuts from New Mexico are major components of the nations supply." www.nass.usda.gov/nm

The New Mexico Farmers' Markets has also compiled data that is available at www.farmersmarketsnm.org. For example, total sales at farmers' markets throughout the State of New Mexico increased from an estimated $1.4 million in 1998 to almost $3.2 million in 2005. The Santa Fe Farmers' Market, which is located both down stream and down wind of LANL, is the largest market, with gross sales of $1,250,000 in 2005. In 2001, "peak day customer counts" were 15,290, which increased in 2005 to 21,867.

Not only is there prime farmland in the vicinity of the three DOE sites in New Mexico, but there are increasing numbers of people who are buying produce grown on the prime farmland.

Outstanding Unresolved Seismic Issues at LANL

8|14.F.1 The May 2007 Probabilistic Seismic Hazard Analysis report estimates a 50% increase in the g force of a possible earthquake at LANL. The draft C-T SPEIS omits an assessment of the new information and how it will impact current, yet alone future, operations. Nevertheless, DOE estimates that the accident with the highest potential impact to a person located off-site would be an earthquake and resulting fire.

Kotowski, Sheri
Page 7 of 11

8|14.F.1 (cont)

DOE must assess the new seismic information in the C-T proposal. DOE must release a supplemental *draft* C-T SPEIS for public review and comment.

A key facility for the proposed Complex Transformation is the Chemistry and Metallurgy Research Replacement (CMRR) Building at LANL. Construction is on going without the installation of the necessary seismic fasteners, ties and other protections that are currently available for construction projects in seismic zones.

CCNS refers DOE to Attachment A, the CCNS testimony presented at the March 27, 2008 hearing in Española, New Mexico, specifically requesting a stop-work order for the CMRR Building at LANL.

Water Usage and Contamination at LANL

- LANL has water rights to approximately 1,662 acre-feet per year.
- Expanded operations would result in LANL pumping 10% more from the regional aquifer, which would exceed their water rights.
- Adding an advanced fuel cycle facility for nuclear power plants would result in LANL exceeding its current water rights by 60%, which could use approximately 2,672 acre-feet per year.
- Contaminants have been found in the regional aquifer, including fast-moving hexavalent chromium (or chrome-6), a cancer-causing carcinogen, and perchlorate, a chlorine-based chemical that interferes with thyroid function.

9|14.E.9; 10|14E.14

- LANL discharges approximately 500 acre-feet per year of industrial and sanitary effluent into the canyons that flow to the Rio Grande.
- LANL is not monitoring all 1,405 waste sites that have the potential to release contaminants into surface water during storms and when the snow melts. As plaintiffs to the Clean Water Act lawsuit against DOE for violations at LANL, we incorporate the amended compliant to our comments.
- The Española Basin was recently designated a sole source aquifer by the Environmental Protection Agency, which requires additional protections. DOE must voluntarily meet the requirements of the Española Basin Sole Source Aquifer and incorporate those requirements, impacts and effects into the supplemental draft C-T SPEIS.

Therefore, DOE must not exceed its water rights at LANL. DOE must prioritize protecting water quality and quantity at LANL. Further, DOE must comply with the requirements for the Española Basin sole source aquifer designation for all operations at LANL.

Radioactive, Toxic and Hazardous Air Emissions at LANL

11|14.D.2

LANL will process 87,000 pounds of high explosives and up to 6,900 pounds of

Kotowski, Sheri
Page 8 of 11

depleted uranium that will be blown up in "dynamic experiments" annually. Currently, LANL is conducting three experiments a week when the winds are blowing about 25 miles per hour over the Pajarito Plateau.

11|14.D.2 (cont)

Under the expanded operations alternative, LANL could increase the release of airborne pollutants by 28%.

Facilities that began operations prior to December 31, 1988 have been granted "grandfather" status through New Mexico air regulations allowing them to emit pollutants that newer facilities cannot. LANL has many grandfathered facilities.

- DOE must stop all open burning and open detonation, which generate air emissions.
- DOE must monitor and implements comprehensive sampling programs at all open burning and open detonation sites and for all activities using high explosives and depleted uranium until such sites are inactive and thoroughly remediated.
- LANL must re-evaluate and broaden their air sampling programs for contaminants.
- DOE must expand air monitoring in downwind communities.
- DOE should no longer hide under the grandfather clause for air emissions from its old facilities at LANL. DOE must institute a program to stop all radioactive, toxic and hazardous air pollutant emissions from LANL facilities.

Health Impacts from LANL Activities

- DOE has grossly under-reported historic radiation emissions by nearly 60-fold as documented by the Centers for Disease Control and Prevention.
- There are increased breast, melanoma, non-Hodgkin's lymphoma, ovary, prostate, testicular and thyroid cancers in Los Alamos County compared to New Mexico. *New Mexico's Right to Know: The Impacts of LANL Operations on Public Health and the Environment*, available at www.nuclearactive.org

12|14.K.11

DOE must fund community-based, independent and comprehensive regional environmental and health surveys that firmly establish links between health of the people and the health of the environment in surrounding downwind and downstream communities.

Expanded Plutonium Pit Production

13|14.K.12

LANL is not in compliance with DOE and Defense Nuclear Facilities Safety Board (DNFSB) safety regulations and recommendations. Some LANL facilities are up to six years behind on preparing and submitting their safety documentation to DOE. Such a lack of compliance poses an unacceptable risk to workers, the public and the environment.

Kotowski, Sheri
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13|14.K.12 (cont) LANL is not the place for pit production because of new information regarding a 50% increase in the g force of a probable earthquake.

LANL needs to be up-to-date and in full compliance with all DOE and DNFSB safety regulations and recommendations.

Cleanup, Remediation and Restoration at LANL

The recent DOE Inspector General reported that LANL would miss important deadlines required by the New Mexico Environment Department cleanup Consent Order. www.ig.energy.gov/documents/IG-0793.pdf. The DOE IG reports:

"The Los Alamos National Laboratory, the New Mexico Environment Department, and the Department of Energy signed a Consent Order providing requirements and a timetable for environmental cleanup at the Laboratory. The Department's Office of Environmental Management funds the work, and the National Nuclear Security Administration manages the work.

14|14.M.2 "Absent a dramatic change in approach, it is unlikely that the Department will complete certain long-term remediation activities in accord with existing requirements. The Department has experienced delays in removing waste and facilities in Areas L and G, making it unlikely that milestones in the Consent Order for these areas will be met.

"The Department did not begin decontamination and decommissioning of 58 structures in Area G and six structures in Area L in 2007, as planned, and does not anticipate funding such work until FY 2011. The Department has experienced delays in removing high-activity transuranic waste from Area G, and, it may be forced to extend the removal schedule for all transuranic waste from 2012 to 2014 due to funding constraints.

"The Department's ability to meet milestones was adversely impacted because it had not ensured the funding priority for decontamination and decommissioning work was consistent with priorities established for meeting Consent Order milestones. The Department had not fully identified the funding needed to carry out all the work necessary to meet the milestones until November 2007.

"We also noted that, based on the November 2007 baseline, a projected funding shortfall exists each year through 2012. Additionally, the projected funding for Consent Order activities does not cover $947 million in "unfunded" contingencies.

"Delays in completing work associated with the Consent Order may increase the risk of employee and public exposure to contaminants. Such delays are likely to increase the cost of the overall environmental cleanup. We made recommendations to improve

Kotowski, Sheri
Page 10 of 11

management of available funds and the schedule for meeting Consent Order milestones."

15|14.M.2 The DOE IG has documented real issues that have not been addressed in the draft C-T SPEIS. Therefore, DOE must retract the draft C-T SPEIS and conduct a reanalysis. DOE must then resubmit the revised draft to the public for review and comment.

All cleanup, restoration and remediation activities must prioritize protection of water.

The sites, which are currently waiting for cleanup, should be addressed first, before any further waste is generated by current and expanded operations.

One of the proposed cleanup plans consists of simply covering contaminated sites in such a way that it would be within health standards for people to work 40 hours a week in an industrial job on the site. This level of cleanup is not adequate for on-site day care, let alone providing for a change in land use, which requires more protection.

The Pajarito Plateau was pristine prior to LANL setting up operations in 1943. DOE must be required to return the Plateau to that condition so that a future pregnant subsistence farmer could live on the land, grow her own food and drink surface water and groundwater for her entire lifetime, as well as that of her offspring, while living on the Pajarito Plateau.

16|14.M.4 The Waste Isolation Pilot Plant (WIPP), which is a disposal facility for transuranic waste, is scheduled to close in 2030. The draft C-T SPEIS analyses for operations continuing past 2030. DOE has not completed an accurate analysis of where future transuranic waste will be disposed. Will LANL become the second WIPP site in New Mexico?

Additional Comments May Be Found on Youtube

CCNS refers DOE to http://youtube.com/ccnsvision2030 for additional public comments about the draft C-T SPEIS.

Incorporate by Reference: CCNS and EVEMG Draft LANL SWEIS comments

CCNS and EVEMG incorporate our joint comments to the draft LANL Site-Wide Environmental Impact Statement (SWEIS) to these comments. The draft LANL SWEIS comments may be found at:
http://www.nuclearactive.org/docs/2005SWEISindex.html

Please contact us should you have any questions or comments.

Kotowski, Sheri
Page 11 of 11

Sincerely,

Joni Arends
CCNS Executive Director

Sheri Kotowski
EVEMG Lead Organizer

Attachment: CCNS March 27, 2008 Comments

Kristov, Lorenzo
Page 1 of 1

PC_54

Lorenzo Kristov
PO Box 927
Davis, CA 956170927

February 7, 2008

Theodore A Wyka
Complex 2030 SEIS Document Manager
Office of Transformation, U.S. Department of Energy, NA-10.1
1000 Independence Avenue, SW.
Washington, DC 20585

Re: Reject the proposed Complex Transformation

Dear Theodore Wyka:

1|16A The Department of Energy should reject proposed Complex 2030 project.

2|9B
3|14O
4|1L
5|13A
6|13A.1 The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal. The Complex Transformation is not needed for national security, would divert funds from really effective security efforts and other urgently needed domestic programs, would have devastating environmental impacts, and is atrocious foreign policy given the state of the world today.

7|1J By building up its arsenal, the US would essentially be telling the world to "Do as I say, not as I do." Please stop any plans for a modernized nuclear arsenal, so the US can assert its leadership for a global effort to control the nuclear weapons threat.

Sincerely,

Lorenzo Kristov

Kruzic, Debby
Page 1 of 1

PC_541

Buenaflor, Delight

From: Debby Kruzic [dkruzic@dhinfo.com]
Sent: Friday, March 07, 2008 5:19 PM
To: DIV.Complex.Transformation
Subject: Form posted from Microsoft Internet Explorer.

Last Name=Kruzic
First Name=Debby
Email Address=dkruzic@dhinfo.com
Street Address=5720 Osuna Road NE
City=Albuquerque
State=NM
ZIP Code=87109
Comments=We are a small company in Albuquerque and have been very fortunate to do business with Los Alamos National Laboratories. The small business division has worked diligently with small businesses to help us meet with laboratory staff and to give us the opportunity to do business with the labs. The people that we have worked with, both in procurement and the end users, have been great to work with and we are very thankful for the business relationships we have with the Laboratory.

1|10B

1

Kuerschner, Erich
Page 1 of 2

PC_1975

Levens, Matthew

From: Erich Kuerschner [erich@gmail.com]
Sent: Wednesday, April 30, 2008 3:16 PM
To: Complex2030
Subject: DOE/NNSA SPEIS on "Complex Transformation" is seriously defective

Erich Kuerschner
HC 74 Box 24614
El Prado, NM, NM 87529-9548

April 30, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|2I I am saddened that DOE/NNSA chose to circumvent the intent of Congress and the American people by excluding aspects of an EIS required by NEPA, and force New Mexican's to continue the process outside of DOE/NNSA to find "transformation complex" alternatives that are acceptable. As it stands, the socioeconomic impacts of the SPEIS are almost completely ignored, and what is included, is largely meaningless and irrelevant. As far as I could tell, no one with graduate work in economics was even hired to participate in this effort. As a result what the EIS appears to me to list as "benefits", most economists would consider "costs".

2|2O I worked on my first EIS as a staff economist on the Skidmore, Owings, and Merrill Environmental Study Group on the Mt. Hood -I80N EIS in 1972. At that time the EIS was a vehicle for being an "honest broker" and the responsibility to weigh the various impacts of the decision were taken seriously. That 1972 study resulted in selecting a true "no-build" option. The NE Portland, Oregon congestion problem was optimally solved in a non-traditional way, not by removed a large swatch of housing and replacing it with lanes of asphalt, but by other transportation (and non-transportation) options. Such an honest attempt to "broker" a transformation" process is sorely lacking here.

1|2I (cont) The requests in the SWEIS to consider the impact of the various options in terms of Article VI of the NPT are summarily dismissed as not required on something that smacks of "executive right" to void the intent of NEPA. It is argued that Congress has endorsed this policy, whereas in fact the FY2008 Defense Appropriation clearly stated otherwise. Unlike the 1971 SOM EIS, no attempt is made to specify the broad objective nor to consider meaningful and broad alternatives.

3|14I Achieving an optimal "complex transformation" has HUGE implications for the US economy in general, and by LANL being the largest employer in northern New Mexico, HUGE implications for northern New Mexico (and Taos).

1|2I (cont) THIS particular EIS seems to me mainly a political document, an attempt to justify a decision to that a pit production facility MUST be part of a nuclear stockpile solution, rather than to use the EIS as a vehicle to reach cost-effective, security producing solutions.

I intend to join the Town and County of Taos, the town of Santa Fe, and Mayor Maestas of Espanola - all agreeing that refusing to explain a project and forcing us to accept a project that appears detrimental to our well-being is not acceptable.

"Public sentiment is everything. With public sentiment nothing can fail; without it, nothing can succeed" -- Abraham Lincoln, First Lincoln Douglas Debate; Ottawa, Ill. (Aug 21, 1858)

1

Kuerschner, Erich
Page 2 of 2

PC_1975

Sincerely,

Erich Kuerschner
505.770.3338

2

Kurtz, Joel
Page 1 of 1

PC_548

Buenaflor, Justin

From: Joel Kurtz [ivanaman@pacbell.net]
Sent: Tuesday, February 26, 2008 10:14 PM
To: Complex2030
Subject: Complex Transformation

Joel Kurtz
906 Warfield Ave
Oakland, CA 94610-1634

February 26, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A;
2|1J

I am writing to express my opposition to the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

I am also opposed to plans to modify nuclear facilities to make it easier for the U. S. to rebuild it's nuclear arsenal.

Moving forward with complex transformation is tantamount to stepping up the arms race across the globe.

You must stop this program.

Sincerely,

Joel Kurtz

1

Kvaas, Bob
Page 1 of 1

PC_1473

Levens, Matthew

From: meteor@rain.org
Sent: Friday, April 25, 2008 8:50 PM
To: Complex2030
Subject: Increased Pit Production

1|3A I oppose any increase in pit production capability. In 2012, the United States will have between 1700-2200 deployed warheads, and a reserve or "hedge" of several thousand more. It also has more than 10,000 pits in storage at the Pantex plant in Texas.
Given the recommendations made in our recent joint report, Toward True Security, calling for a unilateral reduction to 1,000 warheads total, there is no need to produce additional warheads.

2|5C.1 Moreover, in 2007, the JASONs (an independent panel of scientists and engineers that has long advised the U.S.
government on nuclear weapons issues) assessed data from plutonium "accelerated aging" experiments conducted at the nuclear weapons laboratories and concluded that the plutonium components in U.S. nuclear warheads have minimum lifetimes of 85-100 years--and possibly much longer. Since the pits in the current arsenal were produced largely between 1980 and 1989, the core nuclear components of current warheads will remain vital for at least another fifty years.

Sincerely
Bob Kvaas

1

Kyte, Connie
Page 1 of 1

PC_113

Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement—
U.S. Department of Energy
National Nuclear Security Administration

NNSA National Nuclear Security Administration

Written Comment Form

Must be received on or before April 10, 2008.

1|14K
2|14O From a public health perspective this makes no sense. And endangers us all nearly even more. Plus it will cost much money that could be used to create

3|14L new jobs to upgrade our infrastructure. Our roads are dangerous and full of cracks & holes and too narrow without shoulders. We do not want to live near a nuclear waste

4|14M dump and this will produce even more waste to store and Nevada doesn't want it. I lived near Rocky Flats Nuclear Weapons Plant & nearly 5k Ukraine nuclear plant with so many toxic releases. Often we couldn't drink milk from our cows as a result. Now I understand all that plutonium was sent to SRS. What an outrage!

1|14K (cont) So many people live nearby. Please stop nuclear waste shipments to SRS and do not use it to develop more nuclear weapons. We have a lot of leukemia in our family and do not need this threat to our health, lifestyle

5|14I and assault on our economy if no one wants to move or live here. Connie Kyte RN

Please use other side if more space is needed.

Comment forms may be mailed to:
Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, SW
Washington, DC 20585

Comment forms may be faxed to:
(703) 931-9222
or sent by electronic mail to:
complextransformation@nnsa.doe.gov

You may also submit comments through the project website which can be found at:
http://www.complextransformationspeis.com

Labriola, Kathleen
Page 1 of 1

PC_76

Kathleen Labriola
1714 - 9th Street
Berkeley, CA 94710

2/21/08

To the DOE:
Dear Theodore A. Wyka, Documents Manager:
I am writing to give public comment for the Dept of Energy's public hearings regarding
1|16A new nuclear weapons. I completely oppose Pres Bush's proposal to revamp + rebuild our entire stockpile of nuclear weapons. This disastrous proposal which was called "Complex 2030" + has now been renamed "Complex Transformation" is the same old failed nuclear
2|9H weapons program of the Cold War — waste billions of our tax dollars building dangerous + unnecessary nuclear weapons, when we already
3|3A have enough nukes to kill everyone on the planet 3 times. We need our tax dollars for
4|9B health care, schools, infrastructure, + creating jobs, not useless + dangerous nuclear weapons.

Sincerely,
Kathy Labriola

Lacey, Sr. Marilyn
Page 1 of 1

PC_745

Levens, Matthew

From: Sr. Marilyn Lacey [smlacey2@sbcglobal.net]
Sent: Thursday, March 20, 2008 12:15 PM
To: Complex2030
Subject: Letter against the Complex Transformation

Dear Mr. Wyka:
I've recently learned about the Complex Transformation Program, the DOE's intent to renew our nuclear weapons-building capacity. This troubles me deeply. In fact, it outrages me.

1|3A
2|9B
3|14M3 We do not need more nuclear weapons! We should not spend money on the creation of yet more toxic materials that endanger not only our lives but the safety of the very earth we live on.

4|1F Furthermore, it seems to me that this new plan would be in direct violation of the Nuclear Nonproliferation Treaty.

5|1J Isn't it hypocritical for the US to be upgrading its nuclear stockpile while simultaneously pointing the finger at nations like Iran for pursuing something similar?

5|1J (cont.) The arms race is not only foolish and wasteful, it is dangerous and deadly. I have worked in refugee camps and seen the devastation caused by machines of war. When is the US going to take the higher road that leads to peace—the road of true disarmament? Let us show our nation to be a leader in moving the world toward peace.

Please exercise your authority by denying environmental clearance to stop this Complex Transformation in its tracks. The world will thank you.
Sincerely,

Sister Marilyn Lacey, Director
Mercy Beyond Borders

Sr. Marilyn Lacey, Director
Mercy Beyond Borders
1885 De La Cruz Blvd. #101
Santa Clara, CA 95050-3000
Cell: 650-815-1554.
mercybeyondborders@yahoo.com

Without passion nothing happens.
Without compassion the wrong things happen.
-Jan Eliason, United Nations

5/14/2008

Ladner, Jesse
Page 1 of 1

PC_529

Buenaflor, Justin

From: jesseladner@gmail.com
Sent: Monday, February 25, 2008 12:18 PM
To: Complex2030
Subject: courage and wisdom

Theodore Wyka, Complex Transformation SPEIS Manager Office of Transformation, NA-10.1 U.S. Department of Energy/NNSA Washington, DC 20585

Dear Mr. Wyka,

Please have the courage to take us in the right direction. I understand that the responsibility to protect our nation is a heavy weight, but this responsibility requires wisdom more than anything else. This kind of overprotection perpetuates dangers instead of leading us to safety.

1|3A ---------- "Complex Transformation" is a fundamentally flawed, misguided plan that overemphasizes recreating the capacity to research, develop, and manufacture new nuclear weapons. The United States still maintains thousands of nuclear weapons; it does not need to design new types or produce new warheads.

2|13A.1 3|1J In addition, the United States would be more secure if nuclear weapons are eliminated worldwide. The United States should re-affirm our commitment to a world free of nuclear weapons and publicly pursue that goal. This will help U.S. efforts to prevent other nations from developing nuclear weapons. Complex Transformation plans for producing new plutonium pits--the core of nuclear weapons--undermine these critical national security goals.

4|9B The DOE needs to abandon its Cold War mindset. The United States can and will maintain a reliable nuclear arsenal for many years and does not need to build new nuclear weapons. The focus should be on shrinking the still-oversized nuclear weapons complex and on maintaining the safety and security of existing weapons as the size of our nuclear stockpile is reduced.

Sincerely,
jesse ladner
60 bishop allen dr
cambridge, MA 02139

1

Lafaye, Michelle
Page 1 of 1

PC_659

Levens, Matthew

From: Michelle Lafaye [whitekro@msn.com]
Sent: Monday, March 03, 2008 10:19 AM
To: Complex2030
Subject: Nuclear Weapons

Michelle Lafaye
457 Ash Street
Grants, NM 87020-3302

March 3, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

Dear U.S. Senators and U.S. House of Representatives and DOE.

I don't know why I bother to voice my opinion regarding nuclear weapons, waste to the DOE. Departemet of Energy is a euphemistic title which does not fit the agency. It appears to me the Department of everything nuclear does pretty much what it wants to with everything nuclear no matter who or how many people oppose their proposals.

No more new nuclear weapons!

Plutonium pits for nuclear weapons (insanity)!

1|16A Modifying nuclear facilities across the nation to make it easier to rebuild our nuclear arsenal. (Insanity)!

Potential for 50 - 80 plutonium pits annually. (Insanity) Plus!

Walk the Talk America...Why on earth do we need to build up our nuclear weapons? We send a dangerous message to all other nations.

Congress already said no. THE DOE IS NOT AN ELECTED ENTITY....THEY ARE NOT THE KINGS OF AMERICA. PLEASE FOR THE FUTURE HEALTH AND WELLBEING OF FUTURE GENERATIONS OF AMERICANS DO NOT LET THE DOE SHOVE THE GOVERNMENT AROUND...TRUST ME THEY ARE VERY GOOD AT IT. THE DOE IS GOOD AT MISS INFORMATION, AND DIVIDE AND CONQUER TACTICS.

NO MORE NUKES!

Sincerely,

Michelle Lafaye

1

Lammi, John

Page 1 of 1

PC_1629

Levens, Matthew

From: jglammi@roadrunner.com
Sent: Saturday, April 05, 2008 11:49 AM
To: Complex2030
Subject: deport illegal aliens, please

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|2O Please deport illegal aliens.

Sincerely,
John Lammi
2748 Hollyridge Dr
Los Angeles, CA 90068

cc:
Senator Dianne Feinstein
Senator Barbara Boxer
Representative Howard Berman

1

Lamothe, Vivien

Page 1 of 1

PC_1881

Levens, Matthew

From: Vivien LaMothe [viviendenovallo@aol.com]
Sent: Sunday, March 30, 2008 12:55 PM
To: Complex2030
Subject: no new nukes, please!

Vivien LaMothe
203 S. McPherson St
Fort Bragg, CA 95437-4321

March 30, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A The administration's proposal to build a plant to produce plutonium pits for nuclear weapons is abominable.

2|9A Plans to modify nuclear facilities across the country, are also a grievous waste of money that should be spent on our people's needs such as universal health care and education.

3|1J Adding anything to our overkill arsenals would send a contradictory message to other countries, such as Iran, who may be seeking nuclear weapons.

Sincerely,

Vivien LaMothe

1

Lane, Peter
Page 1 of 1

PC_1188

Levens, Matthew

From: Peter Lane [julipetlane@mac.con]
Sent: Thursday, March 27, 2008 2:04 PM
To: ComplexZ030
Subject: nuclear weapons

Peter Lane
932 Westtown Rd, POBox 183
Westtown, PA 19395-1939

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A| Please, NO nuclear weapons!!

Faith in you,

Peter Lane
610 918 3902

Laney, Jim
Page 1 of 1

PC_118

February 21, 2008

Theodore Wyka
National Security Administration
Department of Energy

Dear Mr. Wyka:

As former ambassador to South Korea and longtime observer of the Korean Peninsula, I have seen events demonstrate time and again that dialogue moves conflict toward resolution while threats backed up by overwhelming nuclear dominance only halt such movement and heighten tension.

1|13A.1
2|1J
3|1C

The nuclear deterrence policy is increasingly ineffective. That is, the belief that the United States can demand that other countries disarm while we upgrade and invent new nuclear weapons at home is more untenable by the day.

2|1J (cont.)

The falseness of the premise is seen in the fact that four countries have tested nuclear weapons since the Nuclear Non-Proliferation Treaty sought to limit possession to the five original "nuclear weapon states." Nuclear expert Hans Blix predicts at least a dozen new nuclear powers over the next ten years.

Unfortunately, the lack of widespread awareness and alarm that the world teeters at the nuclear precipice does not make the danger less real. Our only hope rests on the community of nations coming together under the leadership of the United States to work for mutually verifiable nuclear disarmament.

Henry A. Kissinger, Sam Nunn, George P. Shulz and William J. Perry advocated this route when they wrote in the *Wall Street Journal* that the spread of nuclear weapons and know-how could mean that "the deadliest weapons ever invented will fall into dangerous hands."

The concept of "Complex Transformation" flies in the face of the emerging global consensus that nuclear weapons must be banned altogether. The new plan sends the message that the United States is committed to revamping and updating, not reducing and eliminating nuclear weapons. While there is yet time, let us lead to the way to a world finally free of the nuclear menace.

Jim Laney

Laney, Joan
Page 1 of 1

PC_1104

Levens, Matthew

From: Joan Laney [laneyvaugh@bellsouth.net]
Sent: Thursday, March 27, 2008 3:55 PM
To: Complex2030
Subject: nuclear weapons program

Joan Laney
2547 McAdoo
Memphis, TN 38112-3819

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A; 2|9B; 1|16A (cont.) I strongly oppose the Bush administration's proposal to build a plant that will produce plutonium pits for nuclear weapons. I am also opposed to any attempt to rebuild the already huge nuclear arsenal of the U.S. Future generations are at risk when money is taken from education, health care and student loans to pay for an arms race with an intent to kill. This is madness. Please reject any attempt by this administration to increase our capacity to build nuclear weapons.

Sincerely,

Joan Laney

1

Lang, Terry
Page 1 of 1

PC_1553

Levens, Matthew

From: Terry Lang [ttrot@earthlink.net]
Sent: Tuesday, April 15, 2008 4:29 PM
To: Complex2030
Subject: Do not put Americans at risk

Terry Lang
1405 State St.
Marble Falls, TX 78654-4353

April 15, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|8A; 2|16A 3|10C Congress rebuked the Energy Department's last attempts to upgrade the arsenal by defunding the Reliable Replacement Warhead and last year's proposed mega-scale bomb plant. The CMRR project is another irresponsible new program that should be rejected.

4|13A 5|1O 2|16A (cont.) I will put this into a simple english term my grandmother taught me, "poop or get off the pot". We have to defend this country, not try to make it easier to be destroyed. We do not want warheads and misc. mega scale bomb plants spread through-out our lands to make us easier targets. There is no sense in making a bad situation worse. We have to take action to protect ourselves "!when!" we are attacked again, we need to be ready for full scale war. Stupidy, and bad judgement on these decisions will be the downfall of our country. Par for the course of the under-handed back room decisions that are made for us in this country. 'example' freemasons, the Bush's skull & crossbones, etc. This country was built on conspiricy from the beginning and has become worse with power & money. Please make a change beginning now, listen to the people and remember why we are One Nation Under God w/liberity & justice for all. Our children deserve a better world than the horrid caios and destruction that will be their future.

6|14O If you are still reading this, Thank You for your time and listening to a simple person that cares about this world, not only will these plants and facilities be dangerous to humans but also the creatures of the earth.
Think about it. Seriously.

Sincerely,

Terry Lang
325-247-2512

1

Langdon, Gillian

Page 1 of 1

PC_1753

Levens, Matthew

From: Gillian Langdon [langdonstephens@gmail.com]
Sent: Friday, March 28, 2008 11:00 PM
To: Complex2030
Subject: no nuclear weapons

Gillian Langdon
57 Poplar Ave.
Bronx, N.Y., NY 10465-3939

March 28, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A; 2|13A.1 I strongly feel that building more nuclear plants does not make us safer it makes us more vulnerable. I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

1|16A (cont.) I am also opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal.

Sincerely,

Gillian
646-765-6312

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Langhans, Judith

Page 1 of 1

PC_1405

Levens, Matthew

From: Judith Langhans [suelanghans@gmail.com]
Sent: Tuesday, April 08, 2008 1:05 PM
To: Complex2030
Subject: Reject "Complex Transformation' plan to build nuclear weapons

Judith Langhans
4065 Carmel View Rd.
San Diego, CA 92130-2354

April 8, 2008

Theodore A Wyka
Complex 2030 SEIS Document Manager
Office of Transformation, U.S. Department of Energy, NA 10.1 1000 Independence Avenue, SW.
Washington, DC 20585

Dear Theodore Wyka:

1|16A The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal.

The U.S. is just full of bad ideas since this administration took over.
The bunch of business men running things doesn't take into consideration future generations that may or may not be around because of the U.S.
stupidity The world is watching and we are becoming very dangerous to all mankind.

2|1J By building up its nuclear arsenal right now, the US is essentially telling the world, "Do as I say, not as I do."

Sincerely,

Judith Langhans
858-792-4549

Langreck, Lillia
Page 1 of 1

PC_1136

Levens, Matthew

From: Lillia Langreck, SSND [llangrec@ssnd-milw.org]
Sent: Tuesday, April 01, 2008 6:42 PM
To: Complex2030
Subject: new nuclear weapons

Lillia Langreck, SSND
3837 N. 84th Street
Milwaukee, WI 53222-2807

April 1, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A 2|9B It is difficult to fathom a government spending billions on devising weapons of mass destruction. Why do "enlightened" people use their resources, their creativity, their expertise to create weapons that destroy, kill, maim, torture humanity and destroy our planet earth. At the same time monies needed for life-giving programs are non-exeistent. How did we ever get so far from being a civilized people? Someone must turn things around!

I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

Sincerely,

Lillia Langreck, SSND
414-358-2156

Lanier, Jody
Page 1 of 2

PC_349

618 McLaws Street
Savannah, GA 31405
March 25, 2008

Mr. Theodore A. Wyka
Complex Transfomation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Re: Comments on the SPEIS for "Complex 2030"

Dear Mr. Wyka:

1|1D I am opposed to the plan to revitalize our nation's nuclear weapons infrastructure as proposed in the "Complex 2030" plan and urge the Department to postpone any action on it until after the next administration re-scripts the Nuclear Posture Review. I believe that

2|8E this plan is in part another way to implement the Reliable Replacement Warhead (RRW) program that Congress specifically rejected the last fiscal year. There is no need to

3|3A replace current warheads with the RRW. Studies have been done which estimate that current warheads meet modern safety and reliability standards. Also, the plutonium pits in the warheads last for decades so there is no need for them to be replaced now. Even if they needed replacing now the current production rate at Los Alamos (including an emergency surge rate of 20 per year) is sufficient.

4|1J.1 If the RRW design were implemented it would undoubtedly lead to calls to resume nuclear testing. This combined with a revitalized weapons complex designed to match the scale and production rates during the Cold War, would send the wrong signal to the world. We are supposed to be encouraging other countries not to pursue nuclear weapons but we have no moral authority to do this when the world sees us making more bombs. Other nuclear weapons states will increase their arsenals and countries without them will do all they can to acquire them, thinking it is the only way to be secure. In fact, a

5|13A.1 revitalized nuclear weapons complex will make our country, and the world, less secure. It will also be illegal; as it violates our obligations under Article VI of the Non

6|1F Proliferation Treaty (NPT) to cease "the nuclear arms race at an early date and to [achieve] nuclear disarmament". This will certainly be the death knell of the NPT. The president of France, Nicolas Sarkozy, recently stated that his country will reduce its stockpile to fewer than 300. It is time for us to follow his lead and accelerate our disarmament.

7|14O The RRW will also need tritium. As a resident of Savannah I remember a tritium leak from the Savannah River Site (SRS) that shut down our industrial water supply for two weeks. I am somewhat relieved that the DOE has not had any new tritium made at SRS in twenty years and will not be adding to the threat from all the tritium made during the K reator's lifetime.

Lanier, Jody
Page 2 of 2

Mr. Theodore A. Wyka
Page 2
March 25, 2008

However, I am worried that the Department is making new tritium from a reactor at the TVA's Watts Bar commercial power plant. Our country recently convinced North Korea to give up its nuclear weapons program and now we are trying to stop Iran from making bombs from its nuclear program that it claims is for electricity only. Whether Iran's program is for electricity, bombs or both is beside the point We are accusing Iran of doing what we are already doing, mixing a commercial nuclear program with one to make materials for bombs. This is hypocritical and the world knows it. Besides that, the people living near the Watts Bar plant will have to face the threat from tritium leaks that Savannah continues to face from the years of tritium made at SRS. No community should have to face these threats. 8|1L

A revitalized nuclear weapons complex and the RRW also mean that there will be new shipments of plutonium across the country. This means that every community these shipments go through will be at risk from environmental harm if the plutonium leaks out and from terrorist attacks on the shipments. Terrorists would consider them prime targets and we certainly do not need to give them the capacity to harm us. There is no need to be moving plutonium around the country especially now. 7|14O (cont.) 9|13A

The RRW and revitalized weapons complex also will cost us billions of valuable tax dollars. With the economy either in or very near a recession we definitely should not be wasting our tax dollars on a reckless program that will put communities at risk from environmental harm, terrorist attack and ultimately make our nation and the world less secure. We should not even be doing this when the economy is good. The money for these programs would be much better spent on social programs that help us make it through the hard times such as now, improve our health and well being and extend these benefits to less fortunate countries. 10|9H 11|9B

In sum, there is no need at all for the DOE to pursue the RRW and upgrade the nuclear weapons complex as outlined in "Complex 2030". I therefore strongly urge the Department to wait for the new administration to re-script the Nuclear Posture Review since the current one is outdated, abandon all plans to implement the Reliable Replacement Warhead, downsize the current nuclear weapons infrastructure and accelerate the dismantling of nuclear weapons. 12|16A

Thank you for the opportunity to share these comments with you.

Respectfully yours,

Jody Lanier

Jody Lanier

Lansnce, Phylles
Page 1 of 2

PC 333

March 20-2008

Dear Mr Wyka,

Rebuilding the entire nuclear weapons complex with new facilities for stock-piling nuclear weapons and designing, producing and testing thermonuclear weapons of mass destruction is not only immoral but profoundly dangerous illegal and frivolous !! 1|16A

Please consider what you are doing to this beautiful earth and the living creatures on it !! 2|14O

It is time to stop this nuclear insanity and the USA must lead by getting rid of our HUGE nuclear weapon 3|1J

Lansnce, Phylles
Page 2 of 2

3|1J (cont)

stockpile. As long as we, who have already used nuclear bombs(!) are threatening the rest of the world, the rest of the world will attempt to defend themselves with nuclear weapons.

This is a NO-WIN situation — STOP NOW!

Sincerely,

Phyllis Lansnce
3055 Ramshorn Dr
Fremont Mi 49412

Lardon, Jean
Page 1 of 1

PC_2001

Levens, Matthew

From: Jean Lardon [larjea@yahoo.com]
Sent: Wednesday, April 16, 2008 11:0i AM
To: Complex2030
Subject: Nuclear Weapons

Jean Lardon
150 Ocean Lane drive #3G
Key Biscayne, FL 33149-1416

April 16, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|9A I strongly oppose my taxes being spent on any more weapons, especially nuclear weapons. Our planet does not need any more weapon pollution

Sincerely,

Jean Lardon
305-365-9064

Larkin, Don
Page 1 of 4

PC_1968

Levens, Matthew

From: Don Larkin [dlarkin@freelark.com]
Sent: Thursday, April 10, 2008 1:26 AM
To: Complex2030
Subject: comments on the transformation SPEIS

Attachments: livermore_2008_03_19.pdf

livermore_20
03_19.pdf (20

Dear Theodore Wyka,

The attached PDF is a full version of comments I made in abbreviated form (due to time constraints) at the hearing in Livermore on March 19th. Please include them with the other comments you receive on the SPEIS.

Would you also make sure that I'm on the project mailing list?

And could I also ask you to reply to this e-mail so that I know that the message got through? I'd appreciate it.

Thank you.

~Don Larkin
189 Hollywood Avenue
Santa Cruz, CA 95060

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Larkin, Don
Page 2 of 4

PC_1968

Comments on the transformation of the nuclear weapons complex
Don Larkin
Livermore, CA
March 19, 2008

1|1K Over the years you have added, piece by piece, to the infrastructure you need to keep nuclear weapons for decades to come, develop new warheads even in the absence of full-scale testing, and produce an entirely new generation of nuclear weapons. I've been to enough past hearings as you made these additions and upgrades to know that you will find a way to dismiss what we say in opposition to your current plans and do what you plan to do anyway.

So let me simply reiterate the most modest of demands: Plan for the possibility that the government will follow the law of the land — and follow the law yourselves by showing those in power how it can be done.

Article VI of the United States Constitution says in part that:

> "This Constitution . . . and all Treaties made, or which shall be made, under the Authority of the United States, shall be the supreme Law of the Land"

Article VI of the Non-Proliferation Treaty says:

> "Each of the Parties to the Treaty undertakes to pursue negotiations in good faith on effective measures relating to cessation of the nuclear arms race at an early date and to nuclear disarmament, and on a Treaty on general and complete disarmament under strict and effective international control."

2|1F The United States ratified the Non-Proliferation Treaty in 1969 and it went into force on March 5, 1970, over 38 years ago. It's the supreme law of the land, and should be more controlling of what you do than the policies of any particular administration, including the latest Nuclear Posture Review. Honor both Article VIs — Article VI of the NPT which obligates us to universal nuclear disarmament and Article VI of the Constitution which makes that obligation as binding on us as any law passed by Congress or the Constitution itself. Instead of continuing on the dangerous, destructive, and undemocratic path you're on, help lead the way to the worldwide abolition of nuclear weapons.

The NPT is the main legal basis for demanding the abolition of nuclear weapons and the redirection and eventual dismantling of the nuclear weapons complex. But there are even stronger moral and strategic reasons. Most have to do with the horrific nature of nuclear weapons themselves.

However, on this, the fifth anniversary of the invasion of Iraq, it's perhaps appropriate to consider another set of reasons: the ways in which your enterprise fosters conventional wars, how it has contributed to the war in Iraq, and in Afghanistan, and elsewhere:

1. 3|1B The development of nuclear weapons was the first national security endeavor that was both so dangerous and so high tech that it could not be entrusted or explained to the people of this country. It had to be put in the hands of an elite cadre of experts and insiders who would act in our name, but keep vital information from us. Your enterprise thus became the model for

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Larkin, Don
Page 3 of 4

PC_1968

3|1B (cont) the National Security state we now have, just as your product, nuclear weapons, became its primary justification.

Through secrecy and by taking power from the people and putting it in the hands of a few, it's a model that has undermined our democracy, increasingly so as it has been extended and fortified over the years.

1|1K (cont Could an administration keep as many things secret as our current one does, or declare itself the only authority to make "national security" decisions, or take us into a war that most people opposed without the pioneering work you have done — and continue to do — to undermine our democracy? It's doubtful.

2. The terrible weapons you produce provide a cover or an "umbrella" that makes it easier for the United States to go to war. Knowing that they have a nuclear arsenal in their back pocket, political leaders can take edgier, more aggressive stances than they otherwise would. They 1|1K (cont) can threaten war and rely on military action with seeming impunity.

So, where there once might have been an incentive to negotiate, there is now a predisposition to bully and to fight. Far from keeping the peace, nuclear weapons reduce the barriers to so-called "conventional" war.

3. You also taught us that massive, indiscriminate slaughter of civilians, including children and the aged, was OK, that it could be justified; it could be sold to the people in this country as necessary "collateral damage." To accept the Hiroshima bombing as anything but a war 4|16A crime, it is necessary to also accept the mass slaughter of innocents as a legitimate military necessity. It doesn't matter that the reasoning is faulty — that the bombing of Hiroshima, much less Nagasaki, was not required to avoid an invasion of Japan in 1945, and that, in any event, the incineration of those two cities cannot be excused no matter what the circumstances. Once you accept the legitimacy of nuclear weapons for any reason, you accept the anonymous, remote-control, industrial slaughter of fellow human beings.

1|1K (cont) We see now how this acceptance plays out in modern wars, where civilian casualties far outnumber military casualties. In Iraq and Afghanistan, the rules of engagement and military tactics, such as strikes on neighborhoods from the air, produce enormous numbers of civilian deaths and injuries — deaths and injuries that we don't like to think about, but that we nonetheless accept with equanimity. Congratulations, here again you led the way and prepared us to accept what should be unacceptable.

4. You introduced us to existential fear — the fear that mankind could destroy itself and perhaps all of life. Of course, we now experience that fear with other forms of environmental destruction, but you were the first. And fear remains one of your primary products. 4|16A (cont)

There's good reason to be afraid of what these weapons can do and what people will, sooner or later, do with them. But instead of finding ways to remove the cause of that fear, you found ways to keep it going with ever new nuclear weapons and ever continuing upgrades of the weapons complex.

The fear that your products generate has been very useful for getting us into wars. Would Americans be willing to sink so much of their skill and treasure into the military at the

page 2 of 3

Larkin, Don
Page 4 of 4

PC_1968

4|16A (cont) expense of so many other vital needs without the fear that nuclear arms engender? Would there have been enough political support for the Iraq war without the express declaration that it was necessary to prevent a mushroom cloud over an American city? Can an attack on Iran be sold to the American people without the fear that the Iranians might be trying to get a nuclear weapon to use against us? Not a chance. Fear, particularly fear of nuclear weapons, is an essential pillar supporting war and militarism, a pillar you can take much of the credit for constructing.

5. Because the thought that others could have and use the nuclear weapons is so frightening, those in charge of the technology came to embrace the illusion that it could be owned, that 4|16A (cont) you could have a monopoly on it; that proliferation can be stopped. Instead, of course, all technology, perhaps especially weapons technology, proliferates. Everything that you invent will one day, in the not too distant future, be in the hands of others, including those you consider enemies. You blaze the trail; you do the hard expensive work that others can follow more easily and cheaply. You are the engine of proliferation. (I have often thought that Livermore Lab should have a proud sign at its entrance saying "Products to Proliferate.")

5|1J You also keep proliferation alive by example. If it's OK for the United States to upgrade its nuclear weapons complex, why isn't it OK for others to have nuclear weapons? And if the United States has them and is behaving aggressively in the world, why shouldn't other countries get them both to emulate and deter us?

1|1K (cont) Since preventing the proliferation of nuclear weapons is the main selling point for getting this country into war — as we saw in Iraq and are seeing again with regard to Iran — what you do to keep proliferation alive is an immeasurable contribution to present and future wars.

4|16A (cont) 6. Nuclear weapons have also fostered the delusion that overwhelming force can make us safe, that coming down hard on someone is the way to deal with problems. This delusion not only inclines us toward war, it has invaded many other areas of life in the United States. If there's a problem with mind-altering drugs, send users to jail for a long time. If there's a discipline 6|2O problem at school, institute a zero-tolerance policy and expel the miscreants. If there's a problem with illegal immigration, deny them driver's licenses, raid homes and workplaces, and build a wall at the border. The fact that none of this works doesn't seem to matter.

4|16A (cont) Nuclear weapons don't work for their acclaimed purpose either. But to maintain that they are necessary for our security — that actually using them or threatening to use them serves a beneficial social purpose — you must also accept that the threat and use of overwhelming force in other situations is equally valid. Your enterprise thus predisposes us and guides us toward force and war, including so-called "conventional" war, as a way of solving problems.

6|2O (cont) The threat and use of overwhelming force solves nothing, and always creates more problems than it addresses. Its appeal is that it promises a simple fix — the ability to override all the troublesome facts and complications of real-world human life, society, history, and culture with fear and violence. It thus leads us away from the empathy, understanding, effort, and involvement that might provide real progress and instead points us towards intolerance, willful ignorance, militarism, and war.

You are not making us safer; you are not preventing war. Quite the opposite. Safety lies only in abolition.

page 3 of 3

Lasala, Edith

Page 1 of 1

PC_1741

Levens, Matthew

From: elasala@berkshire.rr.com
Sent: Sunday, April 06, 2008 8:03 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|16A, 2|7A: Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE should focus on shrinking the still-oversized nuclear weapons complex and on maintaining the safety and security of our existing weapons arsenal as the size of our nuclear stockpile is reduced.

I ask that you include my comment as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project. Thank you.

Sincerely,
Edith LaSala
34 Cummings Ave
Pittsfield,, MA 01201

cc:
Senator Edward Kennedy
Senator John Kerry
Representative John Olver

1

Lauer, Judith

Page 1 of 1

PC_1901

Levens, Matthew

From: Judith Lauer [rjlauer@juno.com]
Sent: Wednesday, February 20, 2008 8:34 PM
To: Complex2030
Subject: No new nuclear weapons.

Judith Lauer
21105 N. Banbury Road
Noblesville, IN 46062-9740

February 20, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|1J; 2|9H: Stop the hypocrisy! Stop any proposed plans to build a single new nuclear weapon. As the administration is opposed to proliferation of nuclear weapons by other countries (i.e. North Korea, Iran), so must we be opposed to building them ourselves. We must abide by the Non-proliferation Treaty. The tax payers money should instead be spent on training our State Department foreign diplomats in diplomacy, conflict resolution, and non-violence.

Sincerely,

Judith Lauer
317-877-1047

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Lazar, Sharon

Page 1 of 1

PC_198

1|16A
2|9H
3|1J

I am a Unitarian Universalist, and one of our principles is a respect for all life, all existence. The nuclear bombs already on hand are sufficient to destroy life as we know it. I am opposed to spending $150 billion in taxpayer money on plutonium pits to build new nuclear bombs. Our country should be leading the movement with other nations to reduce and eliminate all nuclear weapons.

Sharon Lazar

Sharon Lazar

5104 Yale
Amarillo, Tx 79109

Lee, Linda

Page 1 of 1

PC_1432

Levens, Matthew

From: Linda Lee [lindalee@prodigy.net]
Sent: Thursday, February 07, 2008 4:08 PM
To: Complex2030
Subject: Please Reject "Complex Transformation" plan to build nuclear weapons

Linda Lee
559 - 25th Avenue
San Francisco, CA 94121-2916

February 7, 2008

Theodore A Wyka
Complex 2030 SEIS Document Manager
Office of Transformation, U.S. Department of Energy, NA-10.1 1000 Independence Avenue, SW.
Washington, DC 20585

Dear Theodore Wyka:

The Department of Energy should reject proposed Complex Transformation project.

1|3A, I'm requesting that DOE reject the Complex Transformation proposal to revamp the nuclear weapons arsenal. The argument that the current arsenal is aging is faulty. An independent panel of scientific experts recently certified that the current arsenal has a lifetime of 85 to 100 years.

2|9B Americans have many direct needs that could be met with the estimated $150 billion dollars this Complex Transformation proposal would cost.

Thank you for your consideration of my meassage.

3|1J By building up its arsenal, the US would essentially be telling the world to "Do as I say, not as I do." Please stop any plans for a modernized nuclear arsenal, so the US can assert its leadership for a global effort to control the nuclear weapons threat.

Sincerely,

Linda Lee

1

Legel, Gemma
Page 1 of 1

PC_6

GABRIEL RICHARD CONVENT
15295 Pennsylvania Road
Riverview, Michigan 48193-8001

February 29, 2008

Theodore Wyka
Complex Transformation SPIES Document Mgr.
U.S. Department of Energy
1000 Independence Ave. SW
Washington, DC 20585

Dear Mr. Wyka

1\16A I write to express my strong objection to the new "Complex Transformation" proposal. Do we need more nuclear weapons? Hardly. The thought of increased nuclear weapons production, research and testing appalls and frightens me. This proposal is frivolous, profoundly dangerous, illegal, and in my thinking immoral.

Please hear me and heed my warning—enough is enough.

As your name implies, for the love of God, I implore you to halt your efforts immediately. Do not give it another thought except to stop now.

Most sincerely yours,

Sister Gemma Legel, OSF

Sister Gemma Legel, OSF

Leherissey, Tanya
Page 1 of 1

PC_1946

Levens, Matthew

From: Clarence Cordova [clarence_cordova@msn.com]
Sent: Thursday, April 10, 2008 11:59 AM
To: Complex2030
Cc: Tanya Leheressey; Yesca
Subject: Los Alamos Expanded Operations

Mr. Theodore Wika, Document Manager

Complex Transformation STEIS

1|20 La Jicarita Watershed and Waste Water Study Committee (Committee) was formed to investigate watershed and wastewater issues critical to the Taos County communities of Loma Linda, Tres Ritos, La Placita, Vadito, Picuris Pueblo, Rio Lucio, Llano de la Yegua, Llano Largo, Rodarte, Peñasco, Llano de San Juan, Ojito, Chamisal and adjacent villages. These communities lay within the upper watershed of the Rio Embudo, which is comprised of the Rio Pueblo, Rio Santa Barbara, Rio Chiquito, and their tributaries.

The Committee represents a group formed in 1999 to address long-term water quality issues in the areas mentioned above. The Committee seeks to protect and preserve ground and surface water quality and public health within the area. We are now a Joint Powers Agreement (JPA) registered with the State of New Mexico Department of Finance and Administration. As a JPA we represent local Mutual Domestic Water Consumers Associations (MDWCA), Acequias, Community Associations, and the Sovereign Nation of Picuris.

2|11D; 3|14K We were recently informed of the five-year data collection conducted by the Embudo Valley Environmental Monitoring Group. In light of this small but important information, we would like to see adequate data to determine clear cause of the presence of radionuclide's in our watershed. Health concerns arouse within our group's discussion, particularly in regards to malignant brain tumors and certain types of cancers that are un-quantified, but known to be prevalent in our communities which are directly downwind from the Los Alamos National Laboratory (LANL). With these questions in mind and LANL's refusal to comply with cleanup requirements of the NMED, the members of the committee voted to submit this letter in opposition to the expansion of the Lab's plutonium pit trigger production.

Tanya Leherissey

Tanya Leherissey, Chair Person

La Jicarita Watershed & Wastewater Study Committee

Lehman, Ann

Page 1 of 1

PC_1573

Levens, Matthew

From: ABH@charter.net
Sent: Saturday, April 05, 2008 3:12 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

I ask that you include my comments as part of the official record for the Supplemental Programmatic Environmental Impact Statement for the "Complex Transformation" project.

1|9B As far as I know, the proposed "upgrade" is a total FINANCIAL DRAIN ON OUR ECONOMY at a time when it is in terrible, terrible shape! Products aren't salable. Only contractors benefit.

2|2O Where is there justification for the proposed development, in light of our current capability? Where are the moral, ethical, and practical reasons?

3|1J Let us, for God's sake, take world leadership to REDUCE OUR STOCKPILES, one of the few ways we can encourage other nations to do the same.

3|1J (cont) As to IRAN, the DOE will pull out from under any U.S. efforts to discourage them from nuclear development if we are doing the opposite.

Let's get real. This is very, very important!

Sincerely,
Ann Lehman
p.o. box 3539
stateline,, NV 89449

cc:
Senator Harry Reid
Senator John Ensign
Representative Dean Heller

1

Lehman, Marcia

Page 1 of 1

PC_2051

Levens, Matthew

From: Marcia Lehman [marcia.lehman@comcast.net]
Sent: Friday, April 18, 2008 11:24 AM
To: Complex2030
Subject: No to nuclear weapons!

1|16A America's Weapons of Mass Destruction should be torn down and destroyed by the very military bodies that want to build a new generation of nuclear weapons!! NO, stop the madness!!

2|1J How come our policy toward other countries is "DO AS WE SAY, not DO AS WE DO"? What America says no longer goes. We've lost our moral framework and influence in the world --- preemptive wars, torture, erosion of our democracy and civil rights, greed, greed, greed.

Peace & Hope,
Marcia Lehman
Ambridge, PA 15003

1

Lehrman, Nathaniel

Page 1 of 1

PC_1822

Levens, Matthew

From: N.S.Lehrman, M.D. [nslmd@verizon.net]
Sent: Friday, March 28, 2008 3:50 PM
To: Complex2030
Subject: We oppose the production of new plutonium weapons

Mr. Theodore A. Wixa, Manager,

Dear Mr. Wixa -

1|16A This is to express our firm and determined opposition to the production of new plutonium weapons. Making them harms the environment, violates the Non-Proliferation Treaty and sends a wrong signal to the entire world.

Dr. and Mrs. Nathaniel s. Lehrman

Nathaniel S. Lehrman, M.D., 10 Nob Hill Gate, Roslyn NY 11576; 516/626-0238; former Clinical Director, Kingsboro Psychiatric Center, Brooklyn NY; former Assistant Clinical Professor of Psychiatry, Albert Einstein and SUNY Downstate Colleges of Medicine;

1

Leigh, Mary

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PC_256

KwikKopy PRINTING
1870 Reservoir Street
Harrisonburg, VA 22801
(540) 433-2828
1-800-242-5945
Fax (540) 433-5523

Dear Mr Wyka,
I Am distressed by our government proceeding in a manner that would violate the non-proliferation treaty. Do we need to build 50-80 plutonium pit annually?

1|1F

2|5C.1

sincerely,
Ms Mary Leigh

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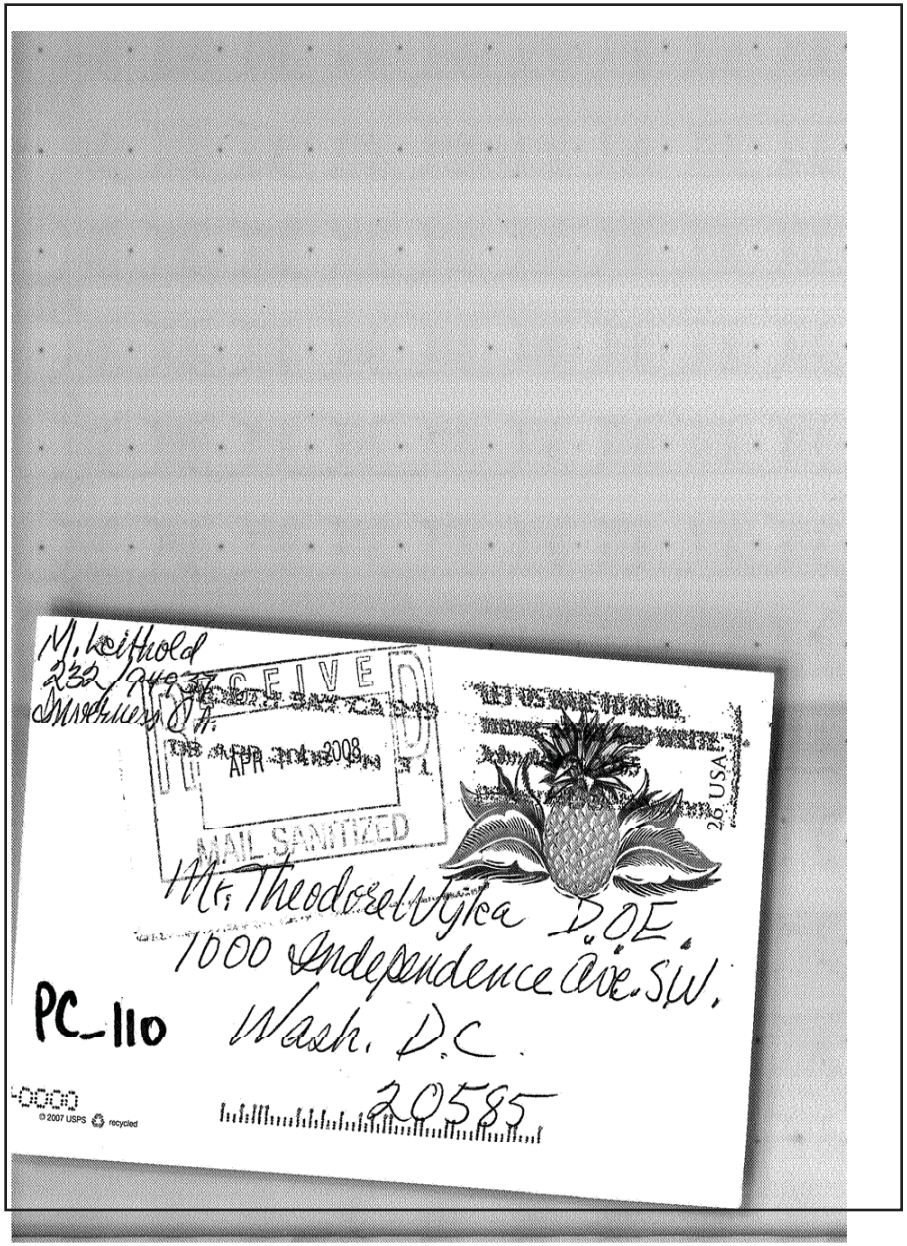
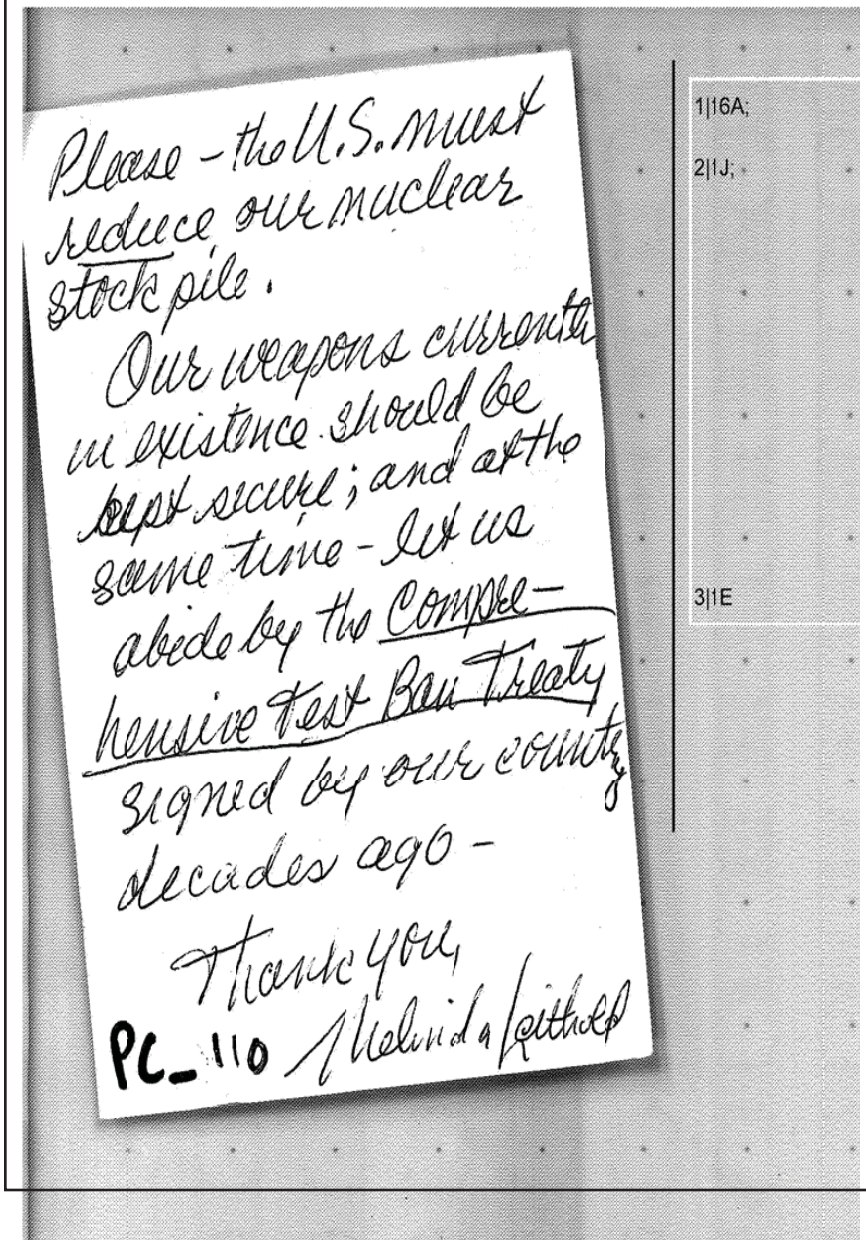
Leithold, Melinda
Page 1 of 2



Leithold, Melinda
Page 2 of 2



Leitold, William
Page 1 of 1

PC_1570

Levens, Matthew

From: Wyka, Ted
Sent: Monday, April 21, 2008 12:58 PM
To: Complex2030
Subject: FW: SPEIS Comment

From: Balsbaugh, Chris **On Behalf Of** Contact NNSA
Sent: Monday, April 21, 2008 11:57 AM
To: Wyka, Ted
Subject: FW: SPEIS Comment

From: wjleitold@aol.com [mailto:wjleitold@aol.com]
Sent: Monday, April 21, 2008 2:39 AM
To: Contact NNSA
Subject: SPEIS Comment

1|2O The decision to transform the U.S. nuclear weapons complex to facilitate the building of new nuclear weapons is a complex technical decision and as such must be delegated to the elected political leadership of the country. Any other course is precluded by the secrets and a technical issue involved, anyone who thinks that this can be decided in a town hall environment is a hopeless utopian romantic.

2|9B In addition the Department of Energy should be putting their resources into new peaceful nuclear power developments.

1|2O (cont) In a world of increasing proliferation and the creation by Russia of new delivery systems new warheads are probably necessary. The distortion of the Jason's Report shows the romantic utopian fantasy that guides the "peace movement".

1|20 (cont) There is no reason to delay a thoughtful decision; if the political decision makers should change or change their minds then the program can be cancelled. Obstruction by those opposed to all things nuclear from weapons to power have created various bottle necks in the manufacturing and the waste cycles it does not follow to use those same bottle necks as justifications to not proceeding forward in developing new weapons. To do so would undermine representative government.

William J. Leitold
529 West 42nd street Apt. 6L
New York, NY 10036

Get the MapQuest Toolbar, Maps, Traffic, Directions & More!

Lemon, Adelle
Page 1 of 1

PC_60

UNOFFICIAL BALLOT
NATIONAL REFERENDUM ON
THE FUTURE OF NUCLEAR WEAPONS

INSTRUCTIONS TO VOTERS: USE BLACK OR BLUE PEN ONLY. To vote on Measures A and B, fill in the oval after the word "Yes" or "No." You may add your own comments below.

Separate ballots are available for the National Nuclear Security Administration of the Department of Energy, and United States Senators and Representatives. Voters are encouraged to cast all four ballots.

MEASURES SUBMITTED TO THE VOTERS
NATIONAL

1|9A A Shall the United States proceed with a $150 billion plan to modernize its nuclear weapons research, development and manufacturing complex in order to replace its existing nuclear weapons and establish the capacity to build new types of nuclear weapons by the year 2030 ("Complex 2030")? YES ○ NO ●

2|1F B Shall the United States, in compliance with its obligation under the Nuclear Non-Proliferation Treaty, commit to the global elimination of nuclear weapons no later than 2030 by initiating negotiations leading to conclusion of a verifiable treaty, under strict and effective international control? YES ● NO ○

3|1J COMMENTS: It is high time for our country to live up to its duty to comply with our intention and promise to work for the global elimination of nuclear weapons!

NAME Adelle E. Lemon
ADDRESS 1063 Cragmont Ave.
Berkeley, CA 94708-1445
SIGNATURE Adelle E. Lemon DATE Jan. 19, 2008

Lenk, Kathleen

Page 1 of 1

PC_1135

Levens, Matthew

From: lenkx001@tc.umn.edu
Sent: Monday, April 07, 2008 4:10 PM
To: Complex2030
Subject: Nuclear weapons production

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|16A I am writing to voice my opposistion to the upgrading of our nuclear weapon complex. I think that we should instead reduce our production of these weapons and focus on ensuring
2|1L that our current arsenals are safe and secure. This issue is particularly important with regard to our reputation among the rest of the world.

Thank you.

Sincerely,
Kathleen Lenk
3537 23rd Ave S
Minneapolis, MN 55407

cc:
Representative Keith Ellison
Senator Norm Coleman
Senator Amy Klobuchar

1

Lent, Patricia

Page 1 of 1

PC_683

Levens, Matthew

From: patlent@juno.com
Sent: Wednesday, March 12, 2008 8:46 PM
To: Complex2030
Subject: Nuclear Weapons Complex

1|1J The nine year old who responded at the hearing to the proposal for a new nuclear weapons complex has it right. It is "insane" on any count to build these terrible weapons.
The United Sates has already stockpiled far more nuclear weapons than any country on the
2|1F planet. By building more, we corner other countries into responding by creating nuclear arsenals of their own in self defense, inviting an incredibly dangerous world-wide arms
3|14O race. In additon, we flaunt world order and our own rule of law by violating the Nuclear
4|16A Non-Proliferation Treaty to which the U.S. is a signatory. These weapons of mass
5|9A destruction are a threat to ourselves as well as the rest of the world. The plant itself is would create an extremely hazardous element in our own environment . If the billions of dollars needed to build these monstrous weapons were spent instead on compassionate aid to to desperately poor populations on the planet, we would create world-wide support rather than the fear and hatred that are truly the seeds of war.

Patricia L.Lent
818 Marywood
Royal Oak, MI 48067

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Lentsch, Mary
Page 1 of 2

2-26-08

PC_216
Y-12 Hearing
Mary Dennis Lentsch
Oak Ridge, TN

My thoughts and words today are prompted by a passage from Scripture in the Book of Deuteronomy, Chapter 30 verse 19. "...I have set before you life and death, the blessing and the curse. Choose life that you and your descendants may live."

1|14O — It is a recognized fact that nuclear weapons are instruments of death and massive destruction. They release immense quantities of heat and energy and also powerful and prolonged radiation. Their destructive power cannot be contained in space or time and they have the potential to destroy all civilization and the entire ecosystem of the planet.

2|13A.1 — The Department of Energy claims that the "Complex Transformation" plan is their "vision for a smaller, safer, more secure and less expensive nuclear weapons complex that leverages the scientific and technical capabilities of [its] workforce and meets national security requirements." I believe the most safe, secure and least expensive nuclear weapons are the ones we don't build at all.

3|1J — We've rejected Complex 2030 and today we are facing a decision about Complex Transformation. I strongly recommend we move ahead to Complex PEACE. In Complex PEACE I envision the U.S. taking world leadership where all nations work for peace in creative ways, advancing together, step by step, stage by stage, until general and complete disarmament has been achieved.

4|1F — Since the NPT was signed by the U.S. in 1970, citizens have walked the tightrope between despair and hope—despair that the U.S. is violating the NPT by continuing to build and strengthen our nuclear arsenal—and hope that decision-makers will come to their senses and honor the obligations of the NPT.

At present under the Stockpile Life Extension Program, we are upgrading bombs to last 100+ years and Complex Transformation proposes to design, produce and test new nuclear weapons.

5|16A — In the fall of 1961, John F Kennedy spoke before the United Nations and I quote a portion of that speech, "Today, every inhabitant of this planet must contemplate the day when this planet may no longer be habitable. Every man, woman and child lives under a nuclear Sword of Damocles, hanging by the slenderest of threads, capable of being cut at any moment by accident or miscalculation, or by madness. The weapons of war must be abolished before they abolish us." These words are as true in 2008 as they were when JFK spoke them in 1961.

2|13A.1 (cont.) — I believe Complex Transformation gives a warped approach to true national security. We must reject the idea that our security can be built on nuclear weapons and think in creative ways to save all people and our planet.

Lentsch, Mary
Page 2 of 2

2|13A.1 (cont.) 6|9H 7|9B — The exorbitant taxpayer funding for nuclear weapon production is NOT a just, compassionate, or wise long-term investment for true national security and global peace. For true national security there must be adequate funds for quality education, developmental childcare, necessary food, decent/affordable housing, and accessible health care. Adequate funding is also needed to protect our natural resources of air, water and soil, and for developing sources of alternative energy.

5|16A (cont.) — In closing, I hope for a future where there will be total justice, fullness of life for everyone and peace for our planet. My hope is in the spirit of Martin Luther King when he said, "Hope is the final refusal to give up." So I will continue to choose life. I will not give up speaking and acting in opposition to nuclear weapons and war.

THANK YOU

5|16A (cont.) — I am opposed to all the alternatives proposed by NNSA/DOE in Complex Transformation. I favor an alternative where nuclear sites are used for dismantling and peacetime use — no nuclear weapon production.

Mary Dennis Lentsch

Lerczak, Kenneth
Page 1 of 1

PC_1129

Levens, Matthew

From: Kenneth Lerczak [kalerc@chartermi.net]
Sent: Thursday, March 27, 2008 1:16 PM
To: Complex2030
Subject: OPPOSE NEW NUCLEAR WEAPONS

Kenneth Lerczak
13 Commons West Ct.
Saginaw, MI 48603-7601

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

IN THE NAME OF THE HUMAN RACE &
ON THIS PLANET IN OUR UNIVERSE:

NO, NO, NO, NO

TO WMD ALREADY IN EXISTENCE:

NO, NO, NO, NO

1|16A TO A DEVELOPEMENT OF A
2|8A NEW GENERATION OF NUCLEAR
WARHEADS.

PEACE IN THE WORLD

CANNOT BE ACCOMPLISHED

BY WMD. PLEASE END THIS
PROLIFERATION OF RESEARCH
AND MANIFACTURING.

THANK YOU FOR BUILDING A
COUNTRY WITHOUT WMD.

I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

Sincerely,

Kenneth Lerczak
989-79-1372

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Lester, James
Page 1 of 1

PC_137

A statement addressing the "Draft Complex Transformation Programmatic Environmental Impact Statement" at Oak Ridge, TN on 26 February 2008 - - presented by James S. Lester of 508 Union Avenue # 306, Knoxville TN 37902:

The official subject of today's hearing is "COMPLEX TRANSFORMATION." That's not a phrase that we use in our everyday conversation, but the people to whom we are directing these comments know very well what it means - - - it means building a new, very expensive weapons complex (billions of dollars to construct and hundreds of billions 1|9A to operate) to insure that the United States will for years to come have more bombs and more destructive bombs than all the rest of the world. What a tragic goal !!

It's already tragic that we have right now the largest inventory of nuclear bombs - - - and that the Department of Energy's currently active program of "Stockpile Life 2|16A Extension" is day by day refurbishing and upgrading yesterday's bombs so that we will always have the largest arsenal - - ready and waiting for immediate use. We can do better!

Please kill the project "COMPLEX TRANSFORMATION".

Levine, Marfa
Page 1 of 1

PC_1798

Levens, Matthew

From: Marfa Levine [zebra@peak.org]
Sent: Friday, March 28, 2008 1:33 AM
To: Complex2030
Subject: nuclear weapons

Marfa Levine
650 SE Bridgeway
Corvallis, OR 97333-1213

March 28, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A 2|5C I strongly urge you to oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons. To do so would take us in the wrong direction. We need to reduce such weaponry, not increase it.

3|1J We and the rest of the world cannot afford to begin another nuclear arms race. We need to provide a model in our asking other countries to refrain from building such weapons.

Please take us in the right, safer, and saner direction.

Thank you for your work.

Sincerely,

Marfa Levine
541-754-6075

1

Levy, Carol
Page 1 of 1

PC_834

Levens, Matthew

From: Carol Levy [leejcaroll@aol.com]
Sent: Thursday, March 27, 2008 5:42 PM
To: Complex2030
Subject: President Bush's plan and New Nuclear Weapons

Carol Levy
600 Whites Road
Lansdale, PA 19446-5237

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|13E.1 2|16A 3|1J; 4|13E.3 Given that we just sent triggers to Taiwan by mistake, this is not the time, nor should it ever be, to restart the U.S.'s nuclear weapons program, We cannot be teling other cuntries they have no right to build them but do so ourselves. We have lost enough moral ground already.
Please say NO! to this administration new attempt to upgrade arsenals and build new plants. Thank you,

Sincerely,

Carol Levy
215-361-9948

1

Levy, Michael
Page 1 of 1

PC_987

April 23, 2008

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10
US Dept. of Energy/ NNSA
1000 Independence Ave, SW
Washington, DC 20585

Dear Mr. Wyka,

I am writing to protest EXPANDED PLUTONIUM PIT PRODUCTION at Los Alamos.

THE REASONS:

Spokesmen for the Pantex Plant state that pit "reuse" is far less expensive and environmentally damaging than new pit production. PANTEX is authorized to reuse up to 350 pits per year. The Pantex Plant stores at least 12,000 pits today.

1|7J LANL must meet its commitment to the people of New Mexico and effectively address its 60-year legacy of pollution here. Until that needed funding and implementation is secured and actualized, it is irresponsible to be planning an increased production of plutonium pits.

2|1C NNSA's "transformation" proposal should be withdrawn until there is a new Nuclear Posture Review. The House Armed Services Committee stated, after President Bush's NPR "there is an urgent need for a debate over the role of nuclear weapons in US strategic posture". There is also a law that requires a bi-partisan commission to recommend by this coming December the number of weapons really needed as well as the size and make-up of the nuclear weapons complex. IT IS ILLOGICAL AND AGAINST THIS GREATER PURPOSE to go ahead with the complex transformation at this time.

3|9B NEW MEXICO AND LANL ARE IDEAL SITES FOR MISSION DIVERSIFICATION, MOST NOTABLY FOR RESEARCH AND ACTUALIZATION OF SOLAR AND WIND TECHNOLOGIES – CRUCIAL FOR ADDRESSING OIL DEPENDENCY ISSUES AND THEREFORE CRITICAL FOR NATIONAL SECURITY.

Sincerely,

MICHAEL T. LEVY
HCR 74 Box 24508
EL PRADO, NM 87529

Lewis, Marvin
Page 1 of 2

PC_1462

Levens, Matthew

From: Marv Lewis [marvlewis@juno.com]
Sent: Friday, February 15, 2008 10:28 AM
To: Complex2030
Subject: Please send my comments to DOE/EIS-0236-S4.

From
Marvin Lewis
3133 Fairfield St.
Phila., PA 19136
215 676 1291
Marvlewis@juno.com

To
Theodore A. Wyka, Complex 2030
SEIS Document Manager, Office of
Transformation, U.S. Department of
Energy, NA-10.1, 1000 Independence
Avenue, SW., Washington, DC 20585
Phone: 1-800-832-0885 (ext. 63519)
E-mail: complextransformation@nnsa.doe.gov

Re: Bombplex also known as
Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement
(Complex Transformation SPEIS, DOE/EIS-0236-S4), comments on

Dear Mr Wyka,
Please send this on to appropriate evaluators in the DoE. I respectfully submit this as my comments on the Complex transformation EIS 0236-S4. Thank you for sending me the optical disk that I have in my computer containing the EIS.

1|16A; Putting this EIS for comment out at this time is inappropriate and untimely. We are in an election year wherein the candidates are all promising changes and face overwhelming budget deficits.
2|9H Consideration of the availability of money when the USA faces 2 wars is a legitimate consideration. If a no action alternative would help the war efforts, then a no action alternative would be attractive. I did not see any consideration of the availability of money in the consideration of 'no action' alternatives nor did I see the consideration of postponing action on the bomblex AKA Complex Transformation to allow government resources to flow to prosecuting 2 wars or other considerations.

Actually, the USA is in 3 wars if you add the World Wide War on Terror, WWWT.

Another bias that I read in this EIS is the inability to accept that technology may advance in leaps and bounds making many of the design features of this Complex transformation inappropriate and counter-productive.

3|2O One example that comes to mind is nanotechnology. I did not see many or any references to the consideration that the expanding field of nonotechnology may have on nuclear bomb production, waste handling, or implosion technology. This is not a comprehensive list that nanotechnology may impact which will affect the design of a nuclear bomb manufacturing facility.

Allow me to explore how nanotech may affect nuclear bomb production. Nanotech has a history of making improvements in many technologies. Right now, shaped conventional explosives (Popular Science Ap 1993 P 64)and lasers (US DoD non critical tests.) are used as triggers for
nuclear bombs. Nanotech has the potential to improve conventional shaped charges many orders of magnitude making the present methods of inspection and disassembly greatly simplified and not needing of the major investment of space and time that is presently

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Lewis, Marvin
Page 2 of 2

required.

PC_1462

Radioactive waste , chemical waste, hazardous waste and many other complicated waste handling procedures may improve or become more problematical with the advent of nanotech procedures. Even small guesses as to how nanotech and other emerging technologies may affect the EIS considerations in the future would be helpful.

This EIS ignores what is known and happening right now, and takes the position that the prognostications by DoE are guaranteed. I would like to see how DoE plans to prognosticate the unexpected. An excellent example is what happened to the Twin Towers on 9-11-2001. Although the facilities in this EIS are sturdy and built of reinforced concrete, the assumption that reinforced concrete fails only in extraordinary circumstances does not hold water. The Twin Towers fell despite the history that no reinforced concrete high rise had ever failed due to fire alone as happened to Building 7 or that no reinforced concrete structure had ever fallen due to an airplane collision.

Agencies and the various administrations have a habit of ignoring that which is uncomfortable, a very human response. The Environmental Coalition Nuclear Power was outmaneuvered when it raised a contention in the TMI#2 Licensing Hearings about the possibility of an airplane crash into TMI#2 causing extensive damage. Fuel was loaded into TMI#2 in the middle of the night to avoid a possibility of a temporary restraining order. Three months later TMI#2 suffered the most extensive failure of a commercial nuclear power plant in US history.

Mr George Tenet presented the President with a Daily Briefing warning of airplane crashing into building in the US. About a month later, 4 airplanes crashed into US buildings in a repeat of a Arafat inspired highjaking of four El Al airplanes in Africa in September of 1970.

3|2O (cont.)

The US Army bought Hummers for use in Iraq and Afghanistan. The possibility of improvised explosive devices did not enter the minds of our generals or the administration. Hummers are being equipped with armor too late for many of our dead and wounded to benefit.

I point out a few of the reasons that I suggest that DoE acts like the input of commenters should have impact. Because a comment is uncomfortable is not a justification for DoE to ignore that comment and its repercussions.

I shall not discuss the impacts of laser triggers as this topic is classified, and I do not have access to classified material. If the DoE wishes my input on this subject, I am available professionally although I retired my registration as a professional engineer.

There appear to be many deficiencies and outright errors in the EIS, but they are too numerous for me to go into herein. In the alternative I respectfully wish to join with Tri Valley Cares in their comments. I do not vacate any of my comments above, nor do I suggest that TriValley Cares agrees with my comments.
Respectfully submitted,
Marvin Lewis, R. P. E. (Retired)
2-15-2008.

2

Lewit, David
Page 1 of 1

Mr. Theodore A. Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
Department of Energy
1000 Independence Ave., SW
Washington DC 20585

PC_984

April 24, 2008

Dear Mr. Wyka:

I know that your job is to promote, not to delay or weaken the effort to update nuclear bomb development and production. So it will be difficult for you to act to the contrary, on pain of having to look for another job. So I wish you the best in that effort---perhaps within the peace movement itself.

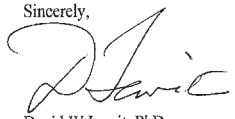
To the extent that "environmental impact" is a major concern, please consider the impact of a successful "transformational" program. Updating bomb capability increases and increases the probability that bombs will be used, and how often they will be used. What will be the environmental impact of an exploded bomb?

1|1J;

2|7M.1

You know how that will affect the food and water supply for your family as well as all humanity and all animal life. I don't have to cite environmental statistics. Instead, we need to apply our brains to the problems of getting along with one another.

Sincerely,



David W Lewit, PhD
271 Dartmouth St.—2h
Boston MA 02116
617-266-8687
dlewit@igc.org

Leyster, Eugenia
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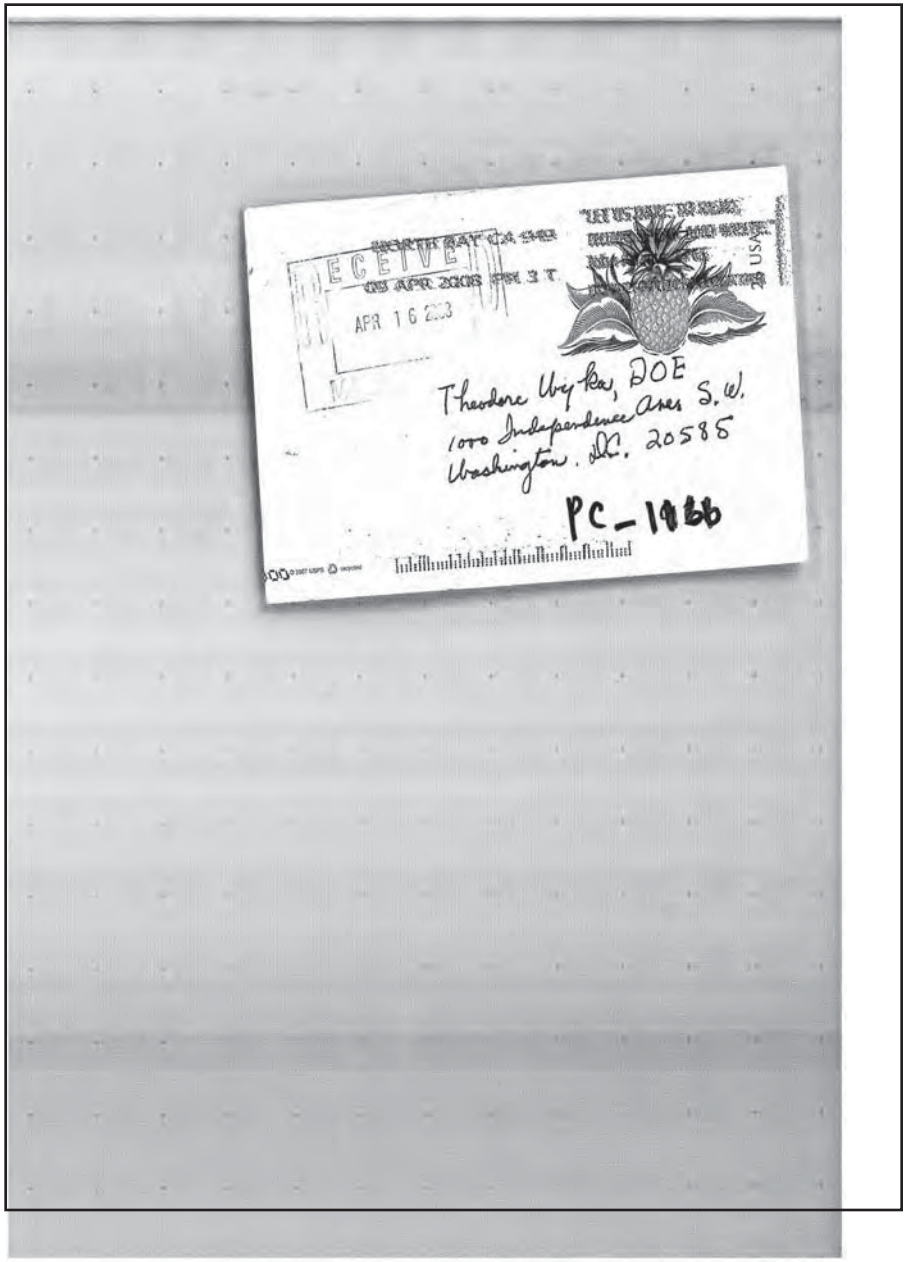

Leyster, Eugenia
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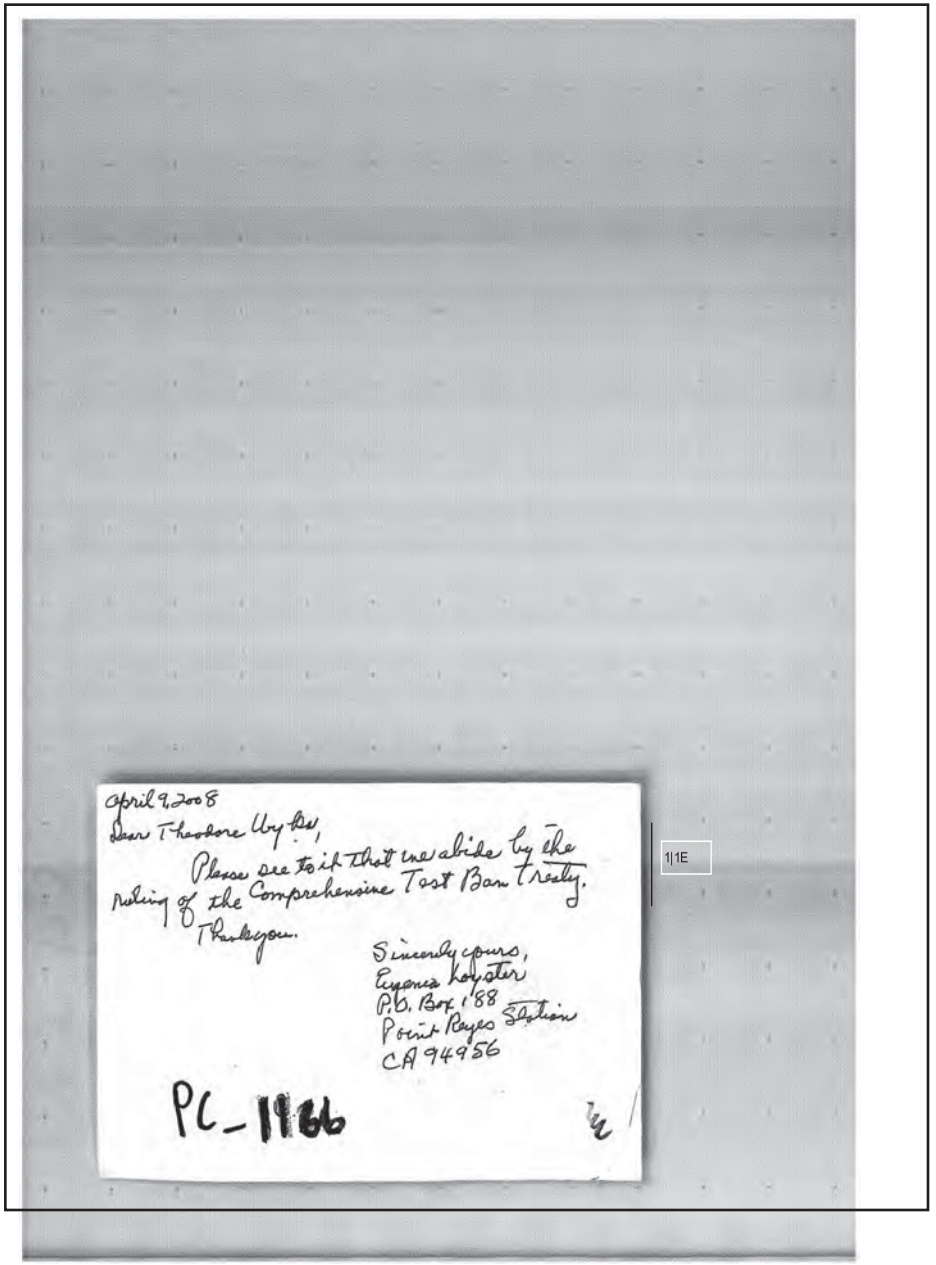

Li, Suzana
Page 1 of 1

PC_1638

Levens, Matthew

From: lily_plant@yahoo.com
Sent: Saturday, April 05, 2008 3:22 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|16A; 2|1J Please do what you can to see that we are not creating new nuclear weapons. I believe that we don't need to increase the numbers of these hazardous materials, and that it will only give an incentive to other nations to do the same. We need more intelligent diplomacy, as well as cooperation with other nations on common issues such as fighting global warming.

Sincerely,
Suzana Li
PO Box 5043
Culver City, CA 90231

cc:
Senator Dianne Feinstein
Senator Barbara Boxer
Representative Diane Watson

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Licthenberg, Don
Page 1 of 1

PC_854

Levens, Matthew

From: Don Lichtenberg [lichten@indiara.edu]
Sent: Thursday, March 27, 2008 2:55 PM
To: Complex2030
Subject: No new nuclear weapons

Don Lichtenberg
715 S Fess Ave
Bloomington, IN 47401-4913

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|3A We have more than enough nuclear weapons. We should reduce the number we have, not build new ones.

Sincerely,

Don Lichtenberg
812 339 0865

Lin, Michael
Page 1 of 1

PC_1651

Levens, Matthew

From: michael_lin@brown.edu
Sent: Saturday, April 05, 2008 3:20 PM
To: Complex2030
Subject: Nuclear refurbishment comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

NNSA has four missions with regard to National Security:

* To provide the United States Navy with safe, militarily effective nuclear propulsion plants and to ensure the safe and reliable operation of those plants.
* To promote international nuclear safety and nonproliferation.
* To reduce global danger from weapons of mass destruction.
* To support United States leadership in science and technology.

(http://www.energy.gov/nationalsecurity/nuclearsecurity.htm)

1|70 2|1J 3|16A I realize that it is necessary to maintain the effectiveness of the nuclear stockpile, but it is also important to champion nonproliferation by reducing the number of missiles and bombs.
Please add a provision for nuclear arms reduction.

Sincerely,
Michael Lin
Box 6289 75 Waterman St.
PROVIDENCE, RI 02912

cc:
Representative Patrick Kennedy
Senator Jack Reed
Senator Sheldon Whitehouse

1

Lindberg, Francine
Page 1 of 2

PC_1749

Levens, Matthew

From: Francine Lindberg [flindberg191@gmail.com]
Sent: Friday, March 28, 2008 1:05 AM
To: Complex2030
Subject: Reject "Complex Transformation" plan to build nuclear weapons

Francine Lindberg
PO Box 372
El Prado, NM 87529-0372

March 28, 2008

Theodore A Wyka
Complex 2030 SEIS Document Manager
Office of Transformation, U.S. Department of Energy, NA–10.1 1000 Independence Avenue, SW.
Washington, DC 20585

Dear Theodore Wyka:

The DOE should reject the Complex Transformation proposal to revamp the nuclear weapons arsenal.

DOE COMPLEX TRANSFORMATION HEARING - SANTA FE NM 3/13/08

My name is Francine Lindberg. I am 50 years old. I am the mother of 4 sons all products of the Taos Municipal School system where my family has lived for over 20 years.

I'm proud to say one son is currently studying in Belgium, another in Germany and the other two have the ambition to study in Japan and Argentina, respectively.

My sons have friends with whom they keep in regular contact who are from Taiwan, Korea, Albania, Spain, Saudi Arabia, Denmark, Germany and Australia just to name a few. I'm well aware of our changing world and the interconnectedness of all beings and of all nations.

1|5C.1 Among the various pieces of Complex Transformation is a plan to build a larger plutonium complex at Los Alamos National Laboratory here in New Mexico. It would allow the capability to produce more than 80 plutonium bomb pits each year. A study by the JASON Defense Advisory Group has determined that existing pits have a lifetime of 85 to 100 years. 85 - 100 years! Why then is there this seeming rush to build new ones?

2|14K 3|1J The international community is well aware of United States culpability in the atomic bombings of Hiroshima and Nagasaki, the catastrophic results of which are still visible today in the form of lasting generational imprint of horror and destruction as family legacy. Why would our great nation want to LEAD the race toward propagating the potential for more such barbarism? As a nation we cannot afford to be isolationist. Isolationism is a concept that no longer bears any validity in the context of today's global reality. We should be leaders in disarmament of ALL nuclear weapons for the sake of our children who ARE the world's children - and their children's children.

3|1J (cont) At a time when the US is attempting to dissuade other countries from developing nuclear weapons, producing new nuclear weapons material would not just damage US credibility, not just violate the Nuclear Nonproliferation Treaty, it would be a blatant act of intractable arrogance and unbridled hypocrisy. It's enough to turn the stomach of the staunchest patriot! I love my country. I'm proud to be an American, and to have the privilege to raise my sons in the greatest nation ever conceived. And as a citizen of the United States and a resident of the
State of New Mexico I say, "The world doesn't need ANY nuclear weapons!"

Before a hasty decision is made to build new nuclear weapons pits, I'd like to see an in

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Lindberg, Francine
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PC_1749

4|11A depth analysis comparing "The strength of US National Security while having a US foreign policy based on a leadership role in global nuclear disarmament as opposed to the strength of US National Security while having a US foreign policy based on the creation of NEW nuclear weapons" (otherwise known as nuclear proliferation).

5|7O It's my understanding that the necessary infrastructure to eliminate ALL nuclear weapons and nuclear weapons grade materials worldwide ALREADY exists. I'd like to see the viability of enhancing National Security through US leadership in global nuclear weapons abolition analyzed as an alternative to Complex Transformation.

3|1J (cont) By building up its nuclear arsenal right now, the US is essentially telling the world, "Do as I say, not as I do."

Sincerely,

Francine Lindberg

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Lindley, Craig
Page 1 of 1

PC_1591

Levens, Matthew

From: c-lindley@sbcglobal.net
Sent: Saturday, April 05, 2008 7:24 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|1F Upgrading our nuclear capability is counterproductive to the goal of non-proliferation of these weapons of mass destruction.
Consolidation, reduction and ultimate elimination of these abominations should be the goal of our nation. Instead of upgrading our capability, the U.S. should initiate a new round of WMD stockpile reduction treaties and set a bold new course for a bold new century. Lets
2|1J bring the nations of the world together and move towards global disarmament. Ban the Bomb!!!

Sincerely,
craig lindley
177 webster st. #338
Monterey, CA 93940

cc:
Senator Dianne Feinstein
Senator Barbara Boxer
Representative Sam Farr

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Lindner, Jan
Page 1 of 1

PC_1623

Levens, Matthew

From: jan43212@yahoo.com
Sent: Saturday, April 05, 2008 10:32 AM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|2O Senator Brown, I know you are a sane and intelligent human being. The rest of you --

YOU FAT-HEADS!

Making new bombs under the guise of "consolidating" nuclear destructive capability is so stupid I can barely keep my language printable.

THERE ARE ALREADY ENOUGH NUCLEAR WEAPONS TO DESTROY THE EARTH.

WE LIVE ON THE EARTH!

Where did you get your education--Ding-Dong School?

Sincerely,
Jan Lindner
335 Clinton Hts
Columbus, OH 43202

cc:
Senator Sherrod Brown
Representative Deborah Pryce
Senator George Voinovich

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Lindsay, Katherine
Page 1 of 1

PC_1124

Levens, Matthew

From: Katherine Lindsey [darkabyss54@yahoo.com]
Sent: Thursday, March 27, 2008 5:56 PM
To: Complex2030
Subject: no more nuclear weapons!

Katherine Lindsey
1723 Cantigny Lane
Katy, TX 77450-6701

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A My name is Katherine Lindsey. I am 15 year old high school student living in Katy, Texas. I am strongly opposed to the building of more nuclear bombs because of the negative repercussions of the bomb used in Japan during World War II that continue to impact innocent people today.

1|16A (cont) After the world saw the destruction of the Holocaust, we said "never again". Unfortunately, we have not followed through on that. Genocide has been and still is a prominent tragedy in our world. Nuclear bombs can be just as destructive. However, only one nuclear bomb has ever been dropped. We have already proven ourselves incapable of not repeating the deadly mistake of genocide. Why does the same have to be true of the use of nuclear bombs?

2|20 I believe that if the Energy Department puts honest thought into these observations, they will not go through with their new project. There is far too much to be lost.

Sincerely,

Katherine Lindsey

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Lindsey, Sandra

Page 1 of 1

PC_393

Levens, Matthew

From: bridgervasquez@yahoo.com
Sent: Monday, March 24, 2008 7:21 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Theodore Wyka, Complex Transformation SPEIS Manager Office of Transformation, NA-10.1 U.S. Department of Energy/NNSA Washington, DC 20585

Dear Mr. Wyka,

Please move forward with plans to consolidate and reduce the facilities, workforce, and redundant capabilities within the nation's nuclear weapons complex.

1|5G

The cold war is over and we must finally stop the insanity of stock-piling nuclear weapons and creating new and better ones.
We need to keep reducing the nuclear weapons that we already have and urge the rest of the world to do the same!

2|13A.1 We need to guarantee our security in America, but developing new nukes is not the way. We do not need the capability to make more or newer nuclear weapons, we need to beat more of our nukes into plowshares!

3|9B The Department of Energy needs to use more resources and subsidies for green power and saving our planet before it is too late.

Thank you.

Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE should focus on shrinking the still-oversized nuclear weapons complex and on maintaining the safety and security of our existing weapons arsenal as the size of our nuclear stockpile is reduced.

Sincerely,
Sandra Lindsey
4701 Norwood Ave.
Loveland, CO 80538

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Litchfield, Sarah

Page 1 of 1

PC_2100

Levens, Matthew

From: Sarah Litchfield [sslitchfield@comcast.net]
Sent: Thursday, April 10, 2008 1:05 PM
To: Complex2030
Subject: No nuclear world, please!

1|16A And particularly no weapons or weapon manufacturing.

2|2O Our weapons industry has to sell them somewhere. Money is a great motivation for war.
3|13A1 Then our weapons can be used against us. Actually, I do not believe they need to be used against anyone. Our country has violated international law way too long in our weapons to
4|1F use only in response/defense. The nuclear weapons that I know of are only good for pre emptive wars.

Sarah Litchfield

434-589-1843 home

434-242-1633 cell

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Livingston, James
Page 1 of 1

PC_538

Buenaflor, Justin

From: jlivings@nmu.edu
Sent: Saturday, February 23, 2008 3:07 PM
To: Complex2030
Subject: Note: Complex Transformation SPEIS Comments

Theodore Wyka, Complex Transformation SPEIS Manager Office of Transformation, NA-10.1 U.S. Department of Energy/NNSA Washington, DC 20585

Dear Mr. Wyka,

By all accounts, one of the major conservative accomplishments of the past generation was our victory in the Cold War. Finally we had banished the remnants of the Evil Empire and created a world order in which that policy of insane "mutually assured destruction" could never occur again. Wrong, I guess. Look at what the conservatives are proposing now.

1|3A "Complex Transformation" is a fundamentally flawed, misguided plan that overemphasizes recreating the capacity to research, develop, and manufacture new nuclear weapons. The United States still maintains thousands of nuclear weapons; it does not need to design new types or produce new warheads.

2|13A.1 In addition, the United States would be more secure if nuclear weapons are eliminated worldwide. The United States
3|1J should re-affirm our commitment to a world free of nuclear weapons and publicly pursue that goal. This will help U.S. efforts to prevent other nations from developing nuclear weapons. Complex Transformation plans for producing new plutonium pits--the core of nuclear weapons--undermine these critical national security goals.

4|9B The DOE needs to abandon its Cold War mindset. The United States can and will maintain a reliable nuclear arsenal for many years and does not need to build new nuclear weapons. The focus should be on shrinking the still-oversized nuclear weapons complex and on maintaining the safety and security of existing weapons as the size of our nuclear stockpile is reduced.

Sincerely,
James L. Livingston
3135 E. CR 456
Skandia, MI 49885

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Lobato, Joyce
Page 1 of 1

PC_2018

Levens, Matthew

From: Joyce Lobato [joyce_lobato@hotmail.com]
Sent: Saturday, April 12, 2008 11:38 AM
To: Complex2030
Subject: LANL Mission

1|16A I live about 30 miles downwind of the Los Alamos National Laboratory. I experienced first hand the smoke and ash that created a doomsday nightmare for many days during the Cerro Grande fire of 2000. I and my husband were very sick with respiratory illness for weeks following that disaster. Many of my neighbors work at the lab and are economically dependent on that income. And many have also suffered cancer and other illness that is likely caused or made worse by the exposure at work or in the general environment as a
2|5C1 downwind community. I strongly urge you to change the mission of the lab. New pit
3|14M production is unnecessary and will further damage the environment and people of Northern
4|9B New Mexico. Instead of creating more WMDs, the expertise and facilities at the lab would be put to much better use to clean up the toxic wastes now stored and remaining at the lab, create new ways to detoxify or safely store nuclear and chemical wastes, improve and create new clean renewable energy sources and generally find ways to make life on this planet better, rather than trying to destroy life. Though I do not have children of my own, I care deeply about the children of the world and think that it is incredibly selfish of our generation to use and misuse the resources of this precious miraculous planet and leave future generations with a horrible and eventually uninhabitable sphere. Please change the mission of the labs! Don't create another Rocky Flats!

Pack up or back up—use SkyDrive to transfer files or keep extra copies. Learn how.
hthttp://www.windowslive.com/skydrive/overview.html?
ocid=TXT_TAGLM_WL_Refresh_skydrive_packup_042008

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Locher, Michelle
Page 1 of 1

PC_2068

Levens, Matthew

From: Michelle Locher [michellelocher@yahoo.com]
Sent: Wednesday, April 30, 2008 10:51 PM
To: Complex2030
Subject: Las Alamos National Lab. Expansion

1|16A
2|14K

I am very distraught to hear about the plutonium bomb facility planning on expanding! Please listen to our voices- nobody wants this to happen! We live down wind from the lab in Taos and I fear for my small son. The children do not have a voice, we all need to stop this for them. Nature and the environment do not have a voice, we need to stop this for them too. I love my child and nature and the Earth, please hear my voice and save them.

PLEASE , PLEASE DO NOT PRODUCE MORE NUCLEAR WEAPONS ANYWHERE ESPECIALLY NOT ON OUR DOORSTEP!
Thank you.
Sincerely,
Michelle locher

Be a better friend, newshound, and know-it-all with Yahoo! Mobile. Try it now.

Logan, Roger
Page 1 of 3

PC_2129

Levens, Matthew

From: The Bear [ursusarctos@worldnet.att.net]
Sent: Thursday, April 10, 2008 5:08 PM
To: Complex2030; Allen, George; Bill Bookless
Cc: Roger RWLOGAN
Subject: From Roger W Logan - SPEIS Complex Transformation Written Input Comments

Importance: High

Attachments: 080409RequestBestComboSPEISrwl.pdf

080409Requ
stComboSPEIS

Dear Complex Transformation (Ted, George, Bill) It was nice seeing all of you at the 18-19 March SPEIS public hearings.
In addition to the prepared comments I read into the record 19 March, attached are additional written comments.

I hope that all of you, perhaps to one degree or another, will realize where I was coming from in writing and sending the attached.
I am an increasingly docile and non-aggressive guy as the years go by, but I also feel an increasing responsibility to make sure our nuclear deterrent and its certification rank second to none.
So much is being forgotten and overlooked.

Well, I heard you got 55,000 comments or so, this is the 2nd from me.
Thanks for the "same day" preliminary response to my 5 prepared questions from 19 March.
I still hope for a 5-0 sweep, all 5 "yes".
Dr Roger W Logan
1st DSW Leader
Now Retired from UC_LLNL
ASME Fellow
The "Halftime" of my career, 3rd Quarter coming up.

RWLOGAN@ATT.NET
925-455-8302 home

PS, 19 March was also the 63rd Anniversary of when the Franklin, CV-13, was hit. Most of those guys were there just like my dad, they just wanted to go home and wash their car. Many of them did not get to do that.

Logan, Roger
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4/09/2008 PC_2129

The Final SPEIS Should Include a "Best Combo" Option

Both "Curatorship" and "Curatorship Plus", with "Best Combo for CTBT" should be included

Dr Roger W Logan[1]

The Dec 2007 draft SPEIS[1] considered the following option for stockpile assessment capability:

1) SBSS[2] (Science Based Stockpile Stewardship)

In addition, the draft SPEIS considered the following two futures for the nuclear stockpile itself:

A. SLEP[3] (Stockpile Life Extension Plan) for the current stockpile warhead types
B. RRW[4] (Reliable Replacement Warhead), new warhead types to replace the current ones

With this comment, I request that NNSA fully consider the following separate options for stockpile assessment capability:

1) SBSS (Science Based Stockpile Stewardship)
2) Curatorship[5]
3) Curatorship Plus[6,7]

1|3A;

I also request that NNSA fully consider the ability of the SPEIS to support the following futures (optionally in combination) for the nuclear stockpile itself:

2|1E

A. SLEP (Stockpile Life Extension Plan) for the current stockpile warhead types
B. RRW (Reliable Replacement Warhead), either the "validated" or "new warhead" variants
C. "Best Combo for CTBT"[8,9]

Option (2), Curatorship:

The draft SPEIS noted the "Curatorship" option for the nuclear stockpile. The draft SPEIS rejected Curatorship, contending that "*In summary, a curatorship alternative does not define a programmatic alternative outside the range of alternatives evaluated in this SPEIS.*"[10] Curatorship contains many of the existing elements of SBSS with SLEP. However, Curatorship proposes to close or curtail many SBSS activities if their mission and budget cannot be justified. The draft SPEIS further rejected Curatorship by noting that "*Allowing any aspects of this capability to atrophy would impair NNSA's ability to assess and, if necessary, address concerns regarding the safety, security, and reliability of a nuclear weapon.*"[10] However, this is inconsistent with the SPEIS itself, which proposes closing many facilities that are held as valuable by the design labs (for example, Site 300 and Superblock). Since the SPEIS has (rightfully) opened the door to closure and curtailing, it is premature to be categorically dismissive of Curatorship just because that option proposes additional closure and curtailing, and with a different justification. Curatorship should be considered more fully in order to properly choose between Curatorship and the current Preferred Alternative.

Option (3), Curatorship Plus:

"Curatorship Plus" blends many aspects of Curatorship and SBSS, but is unique in the following two ways:

- First[6,7], "Curatorship Plus" enables the introduction of small, independent, agile competitors to the main certification agencies (e.g. LLNS_LANS) on existing, already guarded government owned sites such as Livermore and Los Alamos. This has the potential to dramatically reduce overall NNSA costs while dramatically improving efficiency and quality of assessments of the stockpile and its future. Further, potential conflicts of interest in advocating certain stockpile futures over others can be minimized, since these small, independent, agile competitor agencies would have no role and therefore no vested interest in the design, development, or prototyping of either a SLEP or RRW or other stockpile future.

[1] Recent retiree after almost 30 years experience in industry, at Los Alamos, and at Livermore: Former leader of Directed Stockpile Work, ASCI Engineering and Weapons Engineering Campaign; now an ASME Fellow and independent consultant.

Logan, Roger
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1|3A Cont.

- Second[8], "Curatorship Plus" enables quantitative support for the qualitative decision process regarding which facilities and capabilities to close or curtail, and which to keep or even grow. This quantitative assessment is done with several independent computations of a Benefit / Cost Ratio for each decision regarding a facility, capability, or capacity. The same method is used to compare stockpile futures, providing a form of consistent inputs when necessary to trade off between a facility and a stockpile refurbishment action, for example. This unique aspect of "Curatorship Plus" enables us to find the middle ground between Curatorship and SBSS and explain the balance we might choose between both of them.

Future (C), "Best Combo for CTBT"

3|1E

The SPEIS Preferred Alternative claims to accommodate both the (A) SLEP and (B) RRW variants of a stockpile future (plus presumably the two in combination). Curatorship claims to accommodate only (A) SLEP but also leaves some design capability intact should a new weapon be needed. "Best Combo for CTBT" does not preclude validated variants of the RRW or other new weapons, but its near term focus is on the current stockpile warheads. "Best Combo" provides a streamlined, modular version of SLEP that is more cost effective than the legacy SLEP plan. More importantly, "Best Combo" provides for a synergy of the stockpile whereby we can keep the stockpile as close as possible to its original nuclear test base – closer than SLEP or RRW. In this way, "Best Combo" maximizes the useful life of any given warhead type, helping to minimize recurring SLEP costs and capacity needs. "Best Combo" also provides the demonstrably best option to enable us to continue to certify the existing stockpile without a return to nuclear testing. Certain changes would be needed within the SPEIS to accommodate "Best Combo", and these require consideration of the "Best Combo for CTBT" details for each warhead type. These details are provided elsewhere[9].

Summary:

The final SPEIS should consider "Curatorship" and "Curatorship Plus" in addition to "SBSS".

The final SPEIS should also consider "Best Combo for CTBT" in addition to the "SLEP" and "RRW" stockpile futures.

Finally, I would like to specify that both this text and the reports that I've cited in the footnotes should be considered as part of my written comments on the draft Complex Transformation SPEIS. Please contact me if you have any trouble obtaining the text of any of the references below so that they can be included in the written record of comments.

[1] SPEIS: Supplemental Programmatic Environmental Impact Statement, NNSA, Dec 2007.
[2] SBSS: Science Based Stockpile Stewardship
[3] SLEP: Stockpile Life Extension Plan
[4] RRW: Reliable Replacement Warhead: There are several opinions as to whether the RRW would be a validated design or a new weapon design fielded without nuclear testing.
[5] R. Civiak, Managing the U.S. Nuclear Weapons Stockpile – A Comparison of Five Strategies, A Report for Tri-Valley CAREs by Dr. Robert Civiak, July 2000.
[6] R.W. Logan, Prepared Statement provided at SPEIS Public Hearing, Livermore, CA; (Contains a statement with 5 questions that define a combination of Curatorship and "Curatorship Plus"), 19 March 2008, 2 pages.
[7] R.W. Logan, "Summary of March 2008 Complex Transformation Hearings"; (Contains additional narrative and perspective on "Curatorship Plus"), Version 2c, 25 March 2008, 11 pages.
[8] R.W. Logan, "Best Combo for CTBT – and options for a Validated RRW Variant: Maximum Stockpile Certification and Return on Investment, Minimum Risk of Testing", unclassified white paper, 25 March 2006 (Prepared Statement Supplemental Appendix provided at SPEIS Public Hearing, 19 March 2008, Livermore, CA; Contains abbreviated but unclassified summary of overall benefits of Best Combo for CTBT vs. other stockpile futures), 20 pages.
[9] C.K. Nitta and R.W. Logan, ASCI V&V #396 Milestone #396 Final Review and Report (Best Combo is fully detailed in the documentation that accompanies this Completed Milestone) 31 June, 2004.
[10] Draft SPEIS, Pg. 3-129, Dec 2007.

Logan, Roger

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PC_1915

Levens, Matthew

From: The Bear [ursusarctos@worldnet.att.net]
Sent: Sunday, April 27, 2008 8:32 PM
To: Complex2030; Allen, George; Bill Bookless; DAgostino, Thomas
Cc: Roger RWLOGAN; Ostendorff, Bill; Schoenbauer, Martin; Bob Smolen
Subject: From Roger W Logan - SPEIS Complex Transformation Written Input Comments

Importance: High

Attachments: 080427SPEISmustsupportStockpileRWL.pdf

080427SPEIS
tsupportStock

Dear Complex Transformation (Ted, George, Bill, and Tom since I quoted your words at the Senate hearing) It was nice seeing some of you at the 18-19 March SPEIS public hearings.
In addition to the prepared comments I read into the record 19 March, and my written input sent to you 10 April 2008, I am compelled to send the attached additional written input after listening to the Senate Appropriations hearing 16 April.

(Tom, I tried to quote your testimony as closely as I could after scribbling it down as I was listening over the web. Perhaps the overzealous RRW position is being pushed on you by those in LLNS_LANS that are not so familiar with product certification or the restoration of antique cars as they could be. Instead of using the
1|8A 1965 Mustang as a nuclear stockpile analogy, I would use the 1969 Mustang. That was the original RRW component concept, and there was a time when that original RRW component concept had sold itself - but then it was "hijacked" in the words of Senator Biden. When it is pushed continually into the Complex Transformation SPEIS, directly or by inference, it puts true Complex Transformation at risk. Why not give Best Combo a chance instead, it is much less antagonistic!)

I hope that all of you, perhaps to one degree or another, will realize where I was coming from in writing and sending the attached.
2|13A.1 I am an increasingly docile and non-aggressive guy as the years go by, but I also feel an increasing responsibility to make sure our nuclear deterrent and its certification rank second to none.
So much is being forgotten and overlooked.

Well, I heard you got 55,000 comments or so [edit, over 90,000], this is the 2nd [edit, 3rd] from me.
Thanks for the "same day" preliminary response to my 5 prepared questions from 19 March.
I still hope for a 5-0 sweep, all 5 "yes".
I also hope for a "yes" to question 6 in the attached.

Dr Roger W Logan
1st DSW Leader
Now Retired from UC_LLNL
ASME Fellow
The "Halftime" of my career, 3rd Quarter coming up.

RWLOGAN@ATT.NET
925-455-8302 home

PS, 19 March was also the 63rd Anniversary of when the Franklin, CV-13, was hit. Most of those guys were there just like my dad, they just wanted to go home and wash their car. Many of them did not get to do that.

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Logan, Roger

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4/27/2008 PC_1915

The Final SPEIS Should Keep Promises Already Made

Since 1999 and "Campaigns", the taxpayers have funded a promise to support the current stockpile.
The SPEIS must provide the ability for NNSA to make good on what the taxpayers have already paid for.

Dr Roger W Logan[1]

In my previous written comments I have stressed several questions that must be answered[1] and alternatives that must be compared[2] to have a credible Final SPEIS that will adequately fulfill the expensive promise made to the taxpayers to care for our nuclear deterrent.

The Dec 2007 draft SPEIS[3] considered the following option for stockpile assessment capability:
1) SBSS[4] (Science Based Stockpile Stewardship)
In addition, the draft SPEIS considered the following two futures for the nuclear stockpile itself:
A. SLEP[5] (Stockpile Life Extension Plan) for the current stockpile warhead types
B. RRW[6] (Reliable Replacement Warhead), new warhead types to replace the current ones
With my 9 April 2008 comment[7], I requested that NNSA fully consider the following separate options for stockpile assessment capability:
1) SBSS (Science Based Stockpile Stewardship)
2) Curatorship[7]
3|3A ***3) Curatorship Plus[8,9]***
I also requested that NNSA fully consider the ability of the SPEIS to support the following futures (optionally in combination) for the nuclear stockpile itself:
4|1E *A. SLEP (Stockpile Life Extension Plan) for the current stockpile warhead types*
B. RRW (Reliable Replacement Warhead), either the "validated" or "new warhead" variants
C. "Best Combo for CTBT"[10,11]

On listening to the very informative 16 April 2008 hearing[12] of the Senate Appropriations, Energy & Water subcommittee, NNSA Administrator Tom D'Agostino made statements during the Question & Answer period (approximately Minute 56 of the recording) **that compel me to address and emphasize one more point. Here is the approximate quote from Mr. D'Agostino that concerns me:**

> *"If we said RRW is not in our future – (if the country said that – I understand how these decisions get made) – we'd – that would drive the Administrator or future Administrator to say we absolutely need to make investments in facilities we have decided to hold off on. BeO and Be Metal for example is one that we decided 4 years ago – Be is bad stuff, we don't want to work with it, we're not going to spend $300M in Tennessee for a material we'd prefer never to have again in our stockpile. That is still an open question – if we stayed with the existing legacy stockpile, at some point, some future administrator will be here in front of this committee saying 'I need to build a BeO and Be Metal capability', it's just a fact of life because our current stockpile has that."*
>
> *"If we have to reconstruct a Plutonium capability for the cold war stockpile, we'd need much more space than we're planning right now. RRW takes a lot of those materials off the table, we'd never have to use them again."*

This testimony gave me the distinct and troubling impression that NNSA intends that the SPEIS will result in a deliberate inability to support the stockpile warheads we have now. This would be a deliberate plan to default on the billions of dollars that we, the taxpayers, have paid NNSA and its contractors to do this very job. A deliberate path toward such a disaster is unacceptable.

[1] Recent retiree after almost 30 years experience in industry, at Los Alamos, and at Livermore: Former leader of Directed Stockpile Work, ASCI Engineering and Weapons Engineering Campaign; now an ASME Fellow and independent consultant.

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Logan, Roger
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The taxpayers have invested a staggering amount of Money with the NNSA and have been promised that Stockpile Stewardship and Complex Transformation will have the capability to support the warheads in the existing stockpile. The final SPEIS, in addition to comparing the [1-2-3] and [A-B-C] alternatives above, must contain the plans, facilities, and funding profile to support the nuclear warheads in today's nuclear stockpile.

So I request a response to a 6th question, in addition to the 5 questions I asked at the public hearing 19 March 2008:

6. Will the final Complex Transformation SPEIS, in addition to comparing the [1-2-3] and [A-B-C] alternatives above, contain the plans, facilities, and funding profile to support the nuclear warheads in today's nuclear stockpile?

1|8A (cont)

5|11B

RRW or other new warhead alternatives may or may not materialize, but the SPEIS and discussions such as this Senate hearing should not be used as continuing Sales Pitches for RRW. The RRW promises tempting cost savings, ease of acquisition, and is somehow certified without testing as the "Reliable" Replacement Warhead based on a novel NNSA_LLNS_LANS methodology which has never been exposed to public review. These are all unproven assertions which serve only to confuse the issues critical to the SPEIS. Please cleanse the SPEIS and subsequent verbal testimony of this continual and confusing sales pitch for RRW.

Those of you who know me know that I have enthusiastically participated in many new weapons endeavors, so I make these statements with no inherent bias, but the Complex Transformation SPEIS is not the place for such RRW sales rhetoric. Instead of confusing the SPEIS and associated hearings and testimony with continual comparisons to the hypothetical and rather magical RRW, I would like for the SPEIS to contain a complete and coherent analysis of how the Preferred Alternative (as well as 1-2-3 and A-B-C above) could best do what the taxpayers have paid for, which is to provide the ability to make the materials and parts needed for the set of warheads we have right now. Trust must first be built on providing a path to keep these promises which were made so long ago.

Finally, I would like to specify that both this text and the reports that I've cited in the footnotes should be considered as part of my written comments on the draft Complex Transformation SPEIS. Please contact me if you have any trouble obtaining the text of any of the references below so that they can be included in the written record of comments.

[1] R.W. Logan, Prepared Statement provided at SPEIS Public Hearing, Livermore, CA; (Contains a statement with 5 questions that define a combination of Curatorship and "Curatorship Plus"), 19 March 2008, 2 pages.
[2] R.W. Logan, "The Final SPEIS Should Include a "Best Combo" Option, written comment via Email to the NNSA Complex Transformation SPEIS, 9 April 2008, 2 pages.
[3] SPEIS: Supplemental Programmatic Environmental Impact Statement, NNSA, Dec 2007.
[4] SBSS: Science Based Stockpile Stewardship
[5] SLEP: Stockpile Life Extension Plan
[6] RRW: Reliable Replacement Warhead: There are several opinions as to whether the RRW would be a validated design or a new weapon design fielded without nuclear testing.
[7] R. Civiak, Managing the U.S. Nuclear Weapons Stockpile – A Comparison of Five Strategies, A Report for Tri-Valley CAREs by Dr. Robert Civiak, July 2000.
[8] R.W. Logan, Prepared Statement provided at SPEIS Public Hearing, Livermore, CA; (Contains a statement with 5 questions that define a combination of Curatorship and "Curatorship Plus"), 19 March 2008, 2 pages.
[9] R.W. Logan, "Summary of March 2008 Complex Transformation Hearings"; (Contains additional narrative and perspective on "Curatorship Plus"), Version 2c, 25 March 2008, 11 pages.
[10] R.W. Logan, "Best Combo for CTBT – and options for a Validated RRW Variant: Maximum Stockpile Certification and Return on Investment, Minimum Risk of Testing", unclassified white paper, 25 March 2006 (Prepared Statement Supplemental Appendix provided at SPEIS Public Hearing, 19 March 2008, Livermore, CA; Contains abbreviated but unclassified summary of overall benefits of Best Combo for CTBT vs. other stockpile futures), 20 pages.
[11] C.K. Nitta and R.W. Logan, ASCI V&V #396 Milestone #396 Final Review and Report (Best Combo is fully detailed in the documentation that accompanies this Completed Milestone) 31 June, 2004.
[12] http://appropriations.senate.gov/hearings.cfm?s=erg

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Comments on Complex Transformation

Dr Roger W Logan PC_1007

My name is Roger Logan. I've worked in industry and at both Los Alamos and Livermore Labs. I've held technical and leadership responsibility of one sort or the other for every nuclear system in our current stockpile. I was our 1st leader of Directed Stockpile Work, "DSW", and I've assisted in the Annual Certification process every year since it began in 1996.

My Comments:

1. Thank you for changing the name from "Complex 2030" to "Complex Transformation".
2. Thank you for recognizing that "Complex Transformation" must support our current stockpile[1], and "Reliable Replacement Warhead" (RRW) can (and should) be considered separately.

My Theme: Making sure the Preferred Alternative:

1|7N

2|10C

1. Enables NNSA-DP to keep its promises – including some promises long overdue - to support the current nuclear stockpile. Trust is built on promises that are kept, not promises that are broken. This is an essential prerequisite for future trust from the taxpayers.
2. Avoids locking us into a course of action that de facto compels a future of untested, unvalidated nuclear designs, regardless of the "acronym of the year" e.g. RNEP, RRW, etc.
3. Takes maximum advantage of the capabilities of Livermore Lab.
4. Provides maximum stability to our lab and our community, whether the long term trend is up, down, or steady.

My Questions:

I request that the NNSA respond in writing specifically to the following questions and that these responses not be part of lumped or collective general responses. As an Authorized Derivative Classifier (ADC), I constructed these questions to enable simple unclassified "yes or no" answers plus elaboration. I believe that these questions and the appropriate responses are to the benefit of our nuclear stockpile future and the future of the Livermore Lab Site:

3|10I

1. The Preferred Alternative mentions manufacture of Cases at Y-12[2]: Does the Preferred Alternative include facilities and funding to develop, qualify, produce, and certify War Reserve (WR) cases to the same specifications and processes as current WR for each current stockpile system?

[1] "SPEIS", DOE/EIS-0236-S4, pg. S-59, "Prudent Management of NNSA's mission dictates that it has the capability to produce all components necessary for the stockpile.", Dec. 2007.
[2] Ibid., pg S-26 and S-36.

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1|7N (cont)

2. New Pits: The "50/80 Alternative[3]" agrees with our assessment of what is needed to support either the "SLEP" or "Curatorship" or "Best Combo" stockpile futures[4]. However, there's more to pits than just the Great W88. Does the Preferred Alternative include facilities and funding to support Manufacture and Certification of *all* pit types in the current stockpile?

3. New Pits: Does the Preferred Alternative provide an unclassified cost ratio, such as "2x", or "20% Extra", etc., for the use of wrought instead of cast processes?

4. Fogbank: I commend the brevity and conservatism of the recent NNSA public comments on this material. With that said, does the Preferred Alternative include facilities and funding to timely produce WR quality Fogbank as needed for any and all rebuilds of the current stockpile?

5. Does the Preferred Alternative provide a mechanism for the introduction, within existing security perimeters such as the Livermore Site, of small, agile, cost effective contractors to complement or even compete with the Major Contractors (LLNS_LANS, Sandia, etc) for deliverables that are running overdue, such as WR material processes, certification methodologies and assessments, etc?

Summary:

For the Preferred Alternative to provide an acceptable future for our lab and our nuclear deterrent, and to enable essential promises of the past to be kept, the above questions must be answered with appropriate budget and environmental information included. And, the answer to each of these questions must be "yes".

Thank you very much for this opportunity for public comment on this important matter.

[3] ibid., Pg 8-28.
[4] See attached for a history, description, comparison, and references on "SLEP", "Curatorship", "Best Combo", "RRW", pit life estimates, and other possible futures for our nuclear stockpile, Mar. 2006.

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"Best Combo" for CTBT – and options for a *Validated* RRW Variant:
Maximum Stockpile Certification and Return on Investment, Minimum Risk of Testing

Roger W. Logan
In support of "resolving the matters at hand at this crucial time"
25 March 2006: (With Detail from June 2005 in Appendix B)

"In a START I/II World we must retain Stockpile Diversity.....
And guard against Common Mode Failures"
- S. Henry, 17 April 1996

"Russia is anxiously waiting for the U.S. to resume [nuclear] testing – only China probably is more anxious.
Lots of countries in line [after them]"
- N. Sokov, 30 April, 2003

"The labs can be counted on to use a broad interpretation of design parameters that have been validated by nuclear tests.....under the RRW program if the labs are the performers, the judge, and the jury"
- R. Civiak, 24 January, 2006

"I don't see any reason you should change those designs"
- S. Sack, 6 February, 2006

"We should consider deploying two different, competitively designed warhead types for each nuclear delivery system".
- J. Foster, 12 March, 2006

Executive Summary:
Since the end of nuclear testing and the de facto Comprehensive Test Ban Treaty (CTBT) as of 1992, confidence in the reliability of our nuclear deterrent has been reliant on Science Based Stockpile Stewardship (SBSS) combined with the Stockpile Life Extension Plans (SLEP) for each of the existing, certified "WXX" nuclear warheads (where "WXX" represents the warheads B61, W62, W76, W78, W80, B83, W84, W87, W88, and *possibly* a future "RRW").

With ever increasing costs for environmental and safety issues, combined with an aging weapons production infrastructure and post-911 security concerns, a search for "the right" approach to taking care of our nuclear deterrent in the 21st century has emerged anew.

Recently a new concept called the Reliable Replacement Warhead (RRW) has emerged as one potential future approach toward taking the nuclear stockpile into the future decades. Interpretations of the nature of RRW have ranged from that consists of only replacement components[26] validated within the existing nuclear test base (RRW+VAL)[1] to new[18] untested (RRW+NEW)[2] nuclear designs.

Several other approaches that might be alternatives or partners with some variant of RRW have already been proposed and are listed below. Approaches (1-5) are from (Civiak)[16], approach (6) is detailed in a classified draft by (Nitta and Logan)[17] with a brief unclassified summary below in Appendix B, approach (7) is from (O'Brien et al)[18], and approach (8) reflects Congressional language[1] and a combination of the previous approaches.

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Summary of eight possible approaches toward the future nuclear weapons stockpile:

We now outline eight possible approaches toward the future nuclear weapons stockpile, with further detail available in the references as noted. These approaches can be visualized in terms of their propensity toward use of the "SAME" or "NEW" nuclear design base with respect to the existing nuclear test base, and also in terms of their faithfulness to the "SAME" or "NEW" military capability. This visualization is depicted in Figure 1. A progression of "NEW" military capability for *conventional* defeat of hard targets is also shown as an example.

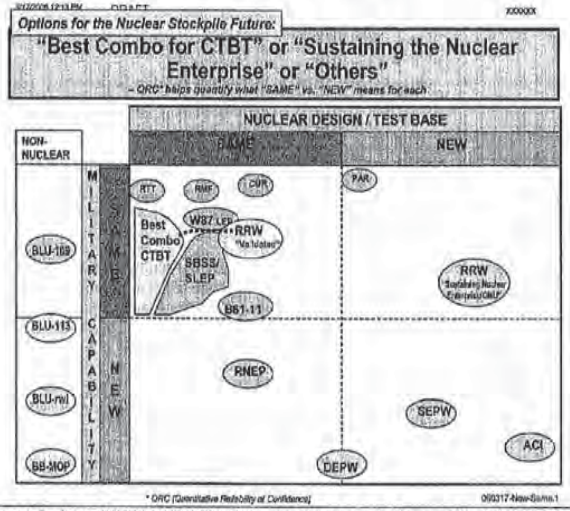

Figure 1. Quadrants of "NEW" and "SAME" for both nuclear design base and military capability. In this notional depiction, all eight of the options for the future nuclear stockpile and its certification fall within the "SAME" military capability row, as envisioned today. Some variants of the proposed RRW fall within the "NEW" nuclear design/test base column, as well as the eventual fate of the Passive Arms Reduction (PAR) option, due to the eventual aging changes which proceed unchecked by design for the PAR option.

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"Best Combo for CTBT"

Whichever approach is taken, use of a "nuclear weapon certification" method that is compatible with a risk-informed decision environment will be important, especially when making the essential quantitative comparisons between the existing nuclear stockpile, proposed RRW candidates, and the risk and benefit/cost associated with the tradeoffs. Methods that enable quantification of reliability at confidence (QRC[28]) are compatible with risk-informed decision environments and provide a continuity of "quantified certification" information, as in the hypothetical but illustrative example comparison in Appendix B. Without methods like QRC, we may be left only with certification metrics that provide only "binary" measures[3] (i.e. "1" or "0"), which can be useful for initial screening, but highly problematic when linkages to risk analyses are desired.

1. *(SBSS+SLEP): The current **DOE Stockpile Stewardship Program**,*
   a. Ideally, quantitative links would augment qualitative linkages from SBSS to SLEP to determine the timing and content of SLEP for each WXX. The content of each SLEP, as determined by SBSS, would drive a Responsive Infrastructure (RI, or the production complex) to do the SLEP content and timing to maximize confidence in the reliability of each WXX system.
   b. In reality, the SLEP timing and scope has been driven more to accommodate the existing RI capability. There has been slow development and acceptance of the use of quantified inputs from SBSS to determine SLEP content and timing.
2. *(REM)[16] **A Remanufacturing Option**, under which DOE would periodically replace all the components in every nuclear weapon with new ones. Nuclear components would be remanufactured as closely as possible to the original designs, but other components could be modified;*
3. *(CUR)[16] **A Curatorship Option**, under which DOE would rely on surveillance and nonnuclear testing to determine when repairs are necessary to nuclear weapons. Only if there is compelling evidence that components have degraded or will soon degrade, and could cause a significant loss of safety, reliability, or performance, would DOE replace the affected parts with new ones. All new components would be remanufactured as closely as possible to the original designs;*
4. *(PAR)[16] **A Passive Arms Reduction Option**, in which DOE would replenish tritium supplies and replace traditional "limited life components", such as batteries and neutron generators, but would make no other repairs to nuclear weapons; and*
5. *(RTT)[16] **A Return to Testing Option**, under which DOE would conduct two to four underground nuclear explosive tests per year, in addition to continuing nearly all the activities of the current Stockpile Stewardship Program.*

More recent additions to the options can be categorized as:

6. *(BCC) **A Best Combo[17] for CTBT Option**, establishing quantitative linkages from SBSS to SLEP for the existing stockpile systems. This linkage would implement specific actions to each nuclear warhead type resulting in higher assessed reliability at confidence at the same or lower SBSS+SLEP cost. The actions outlined are CTBT-friendly, designed to bring each tested nuclear package closer to its test base, rather than further away. **Best Combo for CTBT** contains some elements of SBSS+SLEP, REM, CUR, and PAR, plus some CTBT friendly recommendations previously encouraged by the DOE 30-day study[22] inputs of 1999, and the JASON[24] studies of the 1990s. These and other parts of **Best Combo for CTBT** are evaluated first with a quantitative certification metric based on a quantification of reliability*

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at confidence, and then on a Benefit/Cost Ratio basis. See Appendix B and references[17] for illustrative examples and details.

7. *(RRW+NEW+QMU+(PAR)) A Reliable Replacement Warhead using new nuclear designs as discussed in "Sustaining the Nuclear Enterprise[18]", in the spirit of Brooks' quote[2] (6 Feb 06 TriValley Herald): "This is not about going back to rake over old designs. That's why I've got two different teams of weapons scientists at two labs working on this," Brooks said. "There's never been anything testing that will do the sorts of things we want to do". The current documented[18] intent would be to certify these new untested nuclear designs using the binary metric QMU[3], or quantitative margins and uncertainties method. A de facto Passive Arms Reduction (PAR) would be used for the existing stockpile as the RRW+NEW variants are introduced.*
8. *(RRW+VAL+QRC+BCC) A Combination the RRW VALidated variant, using more nationally pedigreed certification methods with a QRC flavor, but enhancing the current nuclear stockpile and the new RRW+VAL with the features of Best Combo – giving an (RRW+VAL+QRC+BCC) option. This provides a balanced implementation of SBSS+SLEP, REM, CUR, PAR, BCC, and an RRW+VAL version of RRW in the spirit of Congressional language[1], that "any new weapon design must stay within the design parameters validated by past nuclear tests".*

For these eight (8) or any other approaches to the nuclear stockpile future, it will be vital to have a consistent, quantitative means to assess the "quantitative certification" nature of such a stockpile future, including a numerical characterization to support the depiction of "NEW" versus "SAME" regarding the nuclear design and test base as depicted notionally in Figure 1.

In conclusion, it is this author's belief that the design process for RRW should be pursued. However, simultaneously, and certainly before RRW would proceed to production or operational capability, the questions in Appendix A below (and others) should be answered. Furthermore, quantitative certification methods and benefit/cost comparisons should be done as illustrated in Appendix B or in a similar manner.

These comparisons would help us make a more credible decision regarding a choice between two possible blended futures for the stockpile that could combine or omit the possible advantages of the current nuclear stockpile, Foster's recent "twin systems" suggestion, and augmentations with RRW:

(Approach #7:)
RRW+NEW+QMU+PAR:
Reliable Replacement Warhead +
NEW Nuclear Designs +
Quantitative Margins and Uncertainties +
Passive Arms Reduction for the current stockpile

(Approach #8:)
RRW+VAL+QRC+BCC:
Reliable Replacement Warhead +
VALidated Nuclear Designs +
Quantitative Reliability at Confidence +
Best Combo for CTBT for the current stockpile

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Appendix A:
Some questions to be asked and answered to support the proper course for RRW and the future of the nuclear stockpile:

Since the RRW is the newest and perhaps most controversial element of the options above, we offer several questions we feel should first be asked – and answered – about RRW. The answers should be both qualitative and quantitative where appropriate. When quantitative answers cannot be provided in an unclassified setting, then quantitative justification should be demonstrated on a similar but unclassified example so that the use of methods and numbers will be understood.

Many of these questions have been proposed or prompted by Congressional language, and the studies of RRW by Civiak[8] and Medalia[25].

1. Regarding the nuclear stockpile and our confidence in the reliability of its performance, safety, and security: From Medalia[25] RRW: "what design changes does NNSA envision making in warhead components within RRW that could not be made with LEP?"
2. Civiak[8] (RRW, pg 16) quotes a Congressional panel as assessing "the nuclear components of US weapons to be 100 percent reliable", and notes "the real question is, how confidence are the experts in the reliability". Are there ways to assess confidence in reliability? Which ones are being used and which are not? How would they compare the current nuclear stockpile compared to the RRW designs?
3. Is it true (Medalia[25], pg 11) that "all components of Cold War-era warheads are designed to work together with little performance margin to spare"?
   a. If so, how is this consistent with Reliability claimed to be "ONE"?
   b. If not, then perhaps the statement means that someday in the future there will be "little margin to spare" so Reliability maybe less than One – when will this happen?
   c. If we cannot even agree on the life of pits (and hence the timing and size of Modern Pit Facility), aren't we getting a little ahead of ourselves by declaring we need an RRW by 2012 for a reason so similar to pit life – and our inability to agree on it?
4. Is the RRW "more reliable" than the current nuclear stockpile, as its name implies? Explain how this is assessed, with a contrived unclassified example if necessary.
5. After Medalia[5], NWCR: "While it would be costly to maintain the stockpile using LEP, the TF (Overskei[6]) does not show why it would be *increasingly* costly."
   a. Given numerical measures for confidence in the stockpile reliability for performance, safety, and security, compare the present value of the (say) 50-year life cycle cost of each of the 8 approaches above for the nuclear stockpile.
   b. Repeat this same comparison while maintaining a fixed value of the chosen numerical measures for assessment of confidence in the reliability of the nuclear stockpile. (In other words, an apples-to-apples comparison so we do not save money at the expense of confidence in reliability).
6. Civiak (RRW[4] pg 5) points out that the interpretation of the Congressional language regarding "validated by past nuclear tests" risks the labs being "the performers, the judge, and the jury." A vital question in the era of no nuclear testing is, "How can we assure this does not happen?" If we cannot assure this, why should we pursue RRW?
7. In O'Brien et al[18], it is asserted that a method called "Quantification of Margins and Uncertainties" (QMU[3]) will be used to certify RRW. Does this method address reliability, and confidence in reliability? If so, show an unclassified example.

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a. Reviews of the nearly 5 year old QMU method by (NNSA[7], JASON[8], GAO[9]) have asked for clarification of these same issues.
b. With the QMU postulate that "Reliability=ONE", and a metric of "Margin divided by Uncertainty" or M/U>1 to assure that reliability at full confidence, will a postulated RRW increase in Margin M offset an inevitable (Drell and Goodby[10]) increase in uncertainty U? Will you just declare this or numerically assess it? How? Work an unclassified example.

8. Goodwin[11] (6 Feb 06 TriValley Herald) is quoted saying "our plan is to develop a design that lies well within the experience – and within what we call the "sweet spot" – of our historical test base". In modern design, a "sweet spot" would address *at least* three criteria. Give an unclassified example of how you will choose such a "sweet spot" considering these three factors:
   a. Reliability
   b. Robustness
   c. Proximity to the most data
9. What is the counter to the quote of Sack[12] (6 Feb 2006 Herald) "I don't see any reason you should change those designs"? For any such counterstatements, what is the advantage of fulfilling them with a new design RRW versus some "Best Combo" of the nuclear stockpile approaches above (SBSS+SLEP, REM, CUR, FAR, BCC)?
10. Are there approaches other than RRW that can motivate a "Responsive Infrastructure" (RI)? Can the current (SBSS+SLEP) approach motivate an RI?
11. Habiger[13] is quoted as accepting new RRW designs because "the science is pretty well understood" (6 Feb 06 Herald).
    a. If this is true, then is the SLEP schedule also firmly justified by this same science understanding? If so, why doesn't the world end when a SLEP is slipped?
    b. If the science is pretty well understood, do we need the National Ignition Facility (NIF) and Dual Axis Radiographic Hydrotest (DARHT), etc?
    c. If the science is pretty well understood, why can we not make definitive statements about pit life and hence the sizing and timing for new pit production?
    d. Questions 11a-11c do not presuppose any specific answer: Maybe there are solid, supportive answers, but it is apparent that clarification is needed since the expert opinions as quoted in the press and the reviews vary so widely.
12. Speaking of pit production and special nuclear material (SNM) work:
    a. Will RRW increase or decrease the amount of SNM work and pit production for the stockpile?
    b. Will each RRW warhead require a newly manufactured pit?
    c. If so, why should we implement RRW, with the resultant burden on SNM work and pit production, when the lives of the existing pits may be quite long?
    d. Questions 11a-11c do not presuppose any specific answer: Maybe there are solid, supportive answers, but it is apparent that clarification is needed since the expert opinions as quoted in the press and the reviews vary so widely.
13. Drell and Goodby have expressed that "It takes an extraordinary flight of imagination to postulate a modern new arsenal composed of such untested designs that would be more reliable, safe and effective than the current US arsenal based on more than 1,000 tests since 1945"[10].
    a. This implies that "more than 1,000" nuclear tests are relevant to the certification of today's stockpile.

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"Best Combo for CTBT"

   b. Whatever the actual value of this number may be, is the same number applicable to certification of an RRW? In the same way?
14. Forden[14] (Jane's Intelligence Review, Jul 2005) claims an "estimated eight (8) tests" of the full W76. Whether Forden is right or totally wrong:
    a. If there is such a number, will that number for RRW be greater to or less than the similar number for today's stockpile warheads?
    b. How much does this number matter to certifying the confidence in the reliability of the nuclear stockpile or an RRW?
    c. How is the above Forden-like number (or the Drell-Goodby-like "1000" number) determined? How is the number used in determining confidence in reliability? Demonstrate with an unclassified numerical example.
15. Foster[15] (12 Mar 2006 Herald) is quoted saying "we should consider deploying two different, competitively designed warhead types for each nuclear delivery system".
    a. Could this be done with RRW?
    b. Could this be done with today's nuclear stockpile? The APS Panel study on Modern Pit Facility says "yes". Are they right? Why or why not?
    c. Which option would cost more? (Deploying two different, competitively designed warhead types for each nuclear delivery system from the *current* stockpile or from a new *RRW* stockpile?).
    d. Does Foster's suggestion mean more total nuclear warheads or just more types of nuclear designs? Is the latter not a hedge in itself as Foster suggests? Could it mean fewer *total* nuclear warheads even with more *types* of nuclear designs?
    e. If we can implement Foster's "twin nuclear design" suggestion, and reduce the total number of total nuclear warheads as a result, *could we show progress toward amore CTBT-friendly and also less aggressive nuclear posture* by showing that while our number of *types* of nuclear designs has gone up, the *total* number[29] has gone down?

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Appendix B:
"Best Combo" for CTBT: *A Detailed Comparison of Options including RRW's*

"In a START I/II World we must retain Stockpile Diversity..... And guard against Common Mode Failures"
- S. Henry, 17 April 1996

"Russia is certainly waiting for the U.S. to resume [nuclear] testing – only China probably is more anxious. Lots of countries in line [after them]"
- N. Sokov, 30 April, 2003

"The labs can be counted on to use a broad interpretation of design parameters that have been validated by nuclear tests.....under the RRW program if the labs are the performer, the judge, and the jury"
- R. Civiak, 24 January, 2006

"I don't see any reason you should change these designs"
- S. Sack, 6 February, 2006

"We should consider deploying two different, competitively designed warhead types for each nuclear delivery system".
- J. Foster, 12 March, 2006

Executive Summary:

Today, it is generally accepted that our path under the de facto Comprehensive Test Ban Treaty (CTBT) is comprised of Science Based Stockpile Stewardship with the Stockpile Life Extension Plan, or "SBSS with SLEP", notwithstanding schedule delays and sometimes inevitable cost overruns. An interesting comparison of SBSS as one of 5 strategies to manage the US nuclear weapons stockpile was compiled in 2000[16]. A 6th strategy known as "Best Combo for CTBT" was outlined quantitatively by Nitta and Logan in 2004[17] but in a classified venue; the features of "Best Combo" will be compared to the other methods. This updated comparison was motivated by the evolution and consternation in Congress, the Department of Energy's National Nuclear Security Administration (NNSA) and its three nuclear weapons labs, regarding initiatives that have evolved since the Nuclear Posture Review (NPR) of 2002. These initiatives have included ACI (Advanced Concepts Initiative), RNEP (Robust Nuclear Earth Penetrator), and most recently RRW (Reliable Replacement Warhead). Most recently, a 7th Strategy for the stockpile, called "Sustaining the Nuclear Enterprise", has been outlined by O'Brien et al[18]. as one possible implementation for an RRW. An 8th Strategy might involve combining "Best Combo for CTBT" with an RRW that uses validated designs instead of untested nuclear designs.

In this document, the philosophy and features of "Best Combo for CTBT", the 6th Strategy, are compared with the SBSS and the other of the five strategies proposed in 2000[16], and compared with the 7th Strategy, Sustaining the Nuclear Enterprise, and the 8th Strategy, "Best Combo for CTBT with RRW" as well. The same "4-star" rating system is used as in the 2000 study. Of the 8 Strategies, "Best Combo for CTBT" or "Best Combo for CTBT with RRW" emerges as the best of the set, comparing both arithmetic and geometric mean scores across the seven stockpile strategies. The comparison uses costs and quantitative certification metrics for the 7th "Sustaining the Nuclear Enterprise" strategy as inferred from the "Overskei Panel" report[6], compared to the other six strategies where these estimates have been done either in the 2000 study[16] or the 2004 work[17].

In contrast to the recent "Sustaining the Nuclear Enterprise" work, the opinions, data, and interpretations in this work do not necessarily represent or coincide with the official views of the nuclear weapon laboratories or sponsors. Instead, our focus in this work is to offer a "Best Combo for CTBT" option and motivation for further comparisons of the seven options herein.

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Introduction:

It has been nearly 13 years since the last US nuclear test, and our stockpile is now certified under a de facto Comprehensive Test Ban Treaty (CTBT). It has been over 10 years since the dawn of a new paradigm for the nation's nuclear labs, an era known as Science Based Stockpile Stewardship (SBSS), over 8 years since the genesis of the independent Dual Revalidation (DREV) process for the stockpile, over 7 years since the introduction of the formal Stockpile Life Extension Plan (SLEP) process, over 6 years since the formal introduction of "Campaigns" for CTBT stockpile certification, over 5 years since the "30-Day Study" of SBSS, and nearly 4 years since the events of "911" and the Nuclear Posture Review (NPR). The first set of major certification Campaign goals, promised over 5 years ago, were to be met this year (2005). Another major Campaign goal (pit life estimates) was promised for next year (2006).

With the Campaign goals, the SLEP schedule, the schedules for the National Ignition Facility (NIF) and Dual Axis Radiographic Hydrotest (DARHT), all having slipped out further into the future from their original dates, another look at the future of nuclear stockpile certification is needed.

Today, it is generally accepted that our path under this de facto CTBT is comprised of "SBSS with SLEP", notwithstanding schedule delays and sometimes inevitable cost overruns.

In a 2000 report for TriValley Cares, Civiak compared SBSS as a base to four other strategies for the stockpile. The following is a quick summary of these options taken directly from Civiak[16]:

- *(SBSS) The current **DOE Stockpile Stewardship Program**;*
- *(REM) **A Remanufacturing Option**, under which DOE would periodically replace all the components in every nuclear weapon with new ones. Nuclear components would be remanufactured as closely as possible to the original designs, but other components could be modified;*
- *(CUR) **A Curatorship Option**, under which DOE would rely on surveillance and nonnuclear testing to determine when repairs are necessary to nuclear weapons. Only if there is compelling evidence that components have degraded or will soon degrade, and could cause a significant loss of safety, reliability, or performance, would DOE replace the affected parts with new ones. All new components would be remanufactured as closely as possible to the original designs;*
- *(PAR) **A Passive Arms Reduction Option**, in which DOE would replenish tritium supplies and replace traditional "limited life components", such as batteries and neutron generators, but would make no other repairs to nuclear weapons; and*
- *(UGT) **A Return to Testing Option**, under which DOE would conduct two to four underground nuclear explosive tests per year, in addition to continuing nearly all the activities of the current Stockpile Stewardship Program.*

Civiak rates three of the new options, the Curatorship Option (CUR), the Remanufacturing Option (REM), and the Passive Arms Reduction Option (PAR), higher than the current "SBSS with SLEP".

In this work, we explore two added options or strategies. The 6th option is the "Best Combo for CTBT" (BCC) described in detail in the 2004 literature[17], and the 7th and new "Sustaining the Nuclear Enterprise" (SNE) option described in the recent 2005 paper[18].

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"Best Combo for CTBT", other options, and RRW

R.W. Logan

"Sustaining the Nuclear Enterprise": The newest option

The "Sustaining the Nuclear Enterprise" option[18] draws on some of the concepts regarding stockpile diversity as outlined by Logan and Nitta in 2000[19], and specifically stresses the interrelation of warhead Reliability, Confidence, Margin, and Uncertainty; four of the key letters of CRUMBS (Confidence, Reliability, Uncertainty, Margin, Beta, Sensitivity) noted by Logan and Nitta in 2001[20]. As a quick summary, key points in the 7th "Sustaining the Nuclear Enterprise" option paper emphasize:

- Stockpile Diversity
- Reliability
- Confidence
- Margin
- Uncertainty
- Warhead designs must change
- Move from warhead Refurbishment (SLEP) to Replacement (RRW)
- Modified internal components
- Avoid need for nuclear testing (Depend on stockpile stewardship tools to certify modified internals)
- Ease of manufacture
- Avoid hazardous materials
- Minimize life cycle costs

The "Sustaining the Nuclear Enterprise" option argues that "an accumulation of small changes could lead to increased risk of increased uncertainty in warhead certification". In the 6th option, "Best Combo for CTBT", we stress *mitigating and minimizing the small changes, by moving closer to the nuclear test base. The result is that "Best Combo" may provide higher model assessed reliability and higher confidence certification than intentionally inducing large changes that stray from the nuclear test base, loosely accompanied by the use of the word "reliable"*, as in the "Sustaining the Nuclear Enterprise" interpretation of "Reliable Replacement Warhead" (RRW).

We emphasize that regarding the testable, non-nuclear components (typically the "Sandia" or "DoD" components), we view the "Sustaining the Nuclear Enterprise" option as entirely viable and essentially identical to the "Best Combo for CTBT" option. This statement does not apply if changes implied in the "Sustaining the Nuclear Enterprise" variant of RRW cause mass or geometric properties to negate the existing (non-nuclear) flight performance test base – to re-establish this test history does not require nuclear testing, but can only be done at tremendous cost.

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"Best Combo for CTBT": The quietest option – in several ways.

"Best Combo for CTBT" has a theme of specific assessment, maintenance, and refurbishment steps for each stockpile system. The impact of these steps is quantitatively assessed and can be averaged over the entire stockpile as a "Quantitative Certification" number as used below in Table 2. "Best Combo" seeks to maximize this "Quantitative Certification" number, scaled or divided by the taxpayer investment (including social cost if applicable) to do so. "Best Combo for CTBT" or "BCC" has four basic steps, applied in a specific way to each stockpile system as detailed in (Nitta and Logan, 2004)[17]. These steps are:

"Best Combo Step 1": Use the best currently available SBSS tools to assess the performance, reliability, safety, and security of each stockpile system on a regular basis. We adhere to the words of (Tarter, 1999) to describe this "Best Combo Step 1":

> *"Assessments and certification of the performance of stockpiled weapons and modification actions must be demonstration-based – that is, grounded on existing nuclear test data, component level experiments and demonstration, and simulations using detailed, validated computer models"*
> *- Bruce Tarter, 7 Oct 1999 to Senate Armed Services Committee*

"Best Combo Step 2": Assess the improvement to quantitative certification that could be had by DoD accommodations by easing certain requirements in the Military Characteristics for each system. Specific accommodations that take each stockpile system closer to the nuclear test base are assessed in (Nitta and Logan, 2004)[17]. With the end of the Cold War and the reduced stockpile goals outlined in NPR and the Bush-Putin SORT agreements, such accommodations are possible. We recognize they are not cost-free, and we estimate that $300M annually would have to be moved from NNSA to DoD for specific stockpile accommodations. A pioneering example of such a shift is the language proposed by Markey, Tauscher, and now Hobson et al[21] to move NNSA "RNEP" funds to DoD for related, but not identical, purposes. This larger $300M funding shift for "Best Combo" should not be done suddenly so as to disrupt and demoralize; it should be phased in gradually, as savings due to the implementation of the consolidation recommendations and other cost-saving opportunities arise. The funding shift would have to be done with clear, specific language to assure that specific NNSA funds (e.g. savings from complex consolidations or SLEP rescoping) move to a specific DoD purpose (e.g. suggestions discussed in the 1999 30-Day study supplemental materials[22], and in hostile environments[23], for example).

"Best Combo Step 3": Use the SLEP process, but in the spirit of both Civink's "REM" and "CUR" strategies. "Best Combo" SLEP for the nuclear package is like restoring a show-winning antique car; the goal is restoration to the way the car left the showroom, not to chrome-plate or pinstripe everything. For non-nuclear components that do not impact the nuclear performance assessment, we view SLEP and miniaturization advances as a new opportunity to add safety and surety features when the Benefit / Cost Ratio is justified. These "modifications" are first of all testable, second of all non-escalatory as they are for safety and security, not performance, and most of all compel miniaturization and other advances so as not to adversely affect nuclear certification.

"Best Combo Step 4": Address steps such as boost gas enhancements[23],[24] for CTBT to improve the Quantitative Certification metric in Table 2. The BCR for "Best Combo Step 4" considerations should be assessed after consideration of the other "Best Combo" steps – the priority for Step 4 by stockpile system changes greatly when this is done.

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"Best Combo for CTBT", other options, and RRW

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"Best Combo" is used in the 2004 work of Nitta and Logan in that a weapon-specific "Best Combo" for CTBT is quantified, with preliminary but quantitative values for certification metrics, benefit, and cost. However, "Best Combo" could also be used to describe the "Quietest Option" in terms of a "Best Combo" of elements of the five strategies in Civiak's 2000 study; plus *some* of the elements of the new RRW as described in (Medalia, 2005)[25], and in (Markey et al, 2005)[26]; "Best Combo" offers the best CTBT certification with minimal social and geopolitical cost. In addition, "Best Combo" does not preclude truly "Reliable" concepts for RRW as described by Robinson[27] in 2001, e.g. options involving "dummy" components in today's stockpile which can be easily and economically fielded and certified *if a military requirement emerges*.

As a quick comparison, we note that "Best Combo for CTBT" (BCC) emphasizes the same key points as "Sustaining the Nuclear Enterprise" (SNE), but with a few key differences. Let's compare, using the same bulleted list as above. "Best Combo" stresses:

- Stockpile Diversity
  - *But unlike "Sustaining the Nuclear Enterprise", "Best Combo for CTBT" has at least one specific path forward laid out as in (Logan and Nitta, 2000)*
- Reliability
- Confidence
- Margin
- Uncertainty
  - *But unlike "Sustaining the Nuclear Enterprise", with "Best Combo for CTBT" we have already provided two editions of quantitative assessments of these four certification terms for "Best Combo" compared to today's "SBSS with SLEP" and the "Curatorship" option*
  - *"Sustaining the Nuclear Enterprise" is achieved by implementing the new "RRW" concept summarized in (Medalia, 2005[25]). Certification with the lofty assertion of "Reliability=ONE and Confidence=ONE" is contended via QMU, or Quantification of Margins and Uncertainties, as referenced in (Medalia, 2005).*
  - *"Best Combo for CTBT" is achieved by implementing principles of "Design For Six Sigma" or DFSS, as already laid out in a weapon-specific plan in (Nitta and Logan, 2004). Reliability and Confidence are assessed using nationally accepted principles of DFSS, Reliability Engineering, and Verification and Validation, using the nationally recognized methods and references provided in (Nitta and Logan, 2004b[28]).*
- Warhead designs must change
  - *This is a major difference. "Best Combo for CTBT" stresses avoiding change to warhead designs, specifically internals and components whose performance assessment impacts nuclear certification as currently validated by our nuclear test base. Best Combo for CTBT is closer to REM in philosophy here than to "Sustaining the Nuclear Enterprise".*
- Move from warhead Refurbishment (SLEP) to Replacement (RRW)
  - *"Best Combo for CTBT revisits SLEP" – most of the SLEP plan is scaled back in scope and numbers, with a few new elements added for compelling improvements to CTBT certification status – elements that move us closer to the existing nuclear test*

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base, rather than taking us further away. These are specifically addressed in (Nitta and Logan, 2004)[17].

- Modified internal components
  - *If a military requirement were to emerge, "Best Combo for CTBT" would readily accept "modified internal components" in the context discussed in (Robinson, 2001), but not as discussed, implied, and planned in the "Sustaining the Nuclear Enterprise"[18] interpretation of RRW. "Best Combo for CTBT" would address modified internal components with an "RRC" or "Reliable Replacement Components" philosophy, as echoed by (Markey et al, 2005)[26].*
- Avoid need for nuclear testing (Depend on stockpile stewardship tools to certify modified internals)
  - *Modifying internals as discussed and planned in the nuclear labs' RRW literature, while promising to avoid testing, results in something closer to "URW" "Uncertain Replacement Warhead" than "RRW". Reliable Replacement Warhead.*
- Ease of manufacture
  - *"Sustaining the Nuclear Enterprise" promises new warhead designs, more tolerant of manufacturing variabilities, etc; but at the same time takes us away from the current stockpile designs and their underground test validation referent. In contrast, "Best Combo for CTBT" stresses use of Design-For-Six-Sigma (DFSS) principles as practiced in modern industry, so that tolerances are held tighter and are met the first time, and moves the existing stockpile closer to the underground test referent.*
- Avoid hazardous materials
  - *"Sustaining the Nuclear Enterprise" implicitly promises to "avoid hazardous materials" by some magical but undefined mechanism. Best Combo for CTBT stresses modern design methods that retain the materials used in the existing nuclear test base, but minimize the trial-and-error manufacturing processes of decades ago.*
- Minimize life cycle costs
  - *Instead of the "Sustaining the Nuclear Enterprise" plan of minimizing life cycle Cost, $C, "Best Combo for CTBT" seeks to maximize the quantitative stockpile value, or Benefit $B, quantified with certification metrics, compared to the Cost $C of doing so: the common metric Benefit / Cost Ratio (BCR) is used.*

"Best Combo" also can be viewed in context of the 5 strategies presented in (Civiak, 2000), and in the context of some other popular studies and initiatives:

- SBSS: "Best Combo" draws on the tools and facilities of SBSS, and on elements of SLEP, but does so selectively in terms of quantified certification and BCR
- REM: "Best Combo" shares the philosophy of "Remanufacture" (and RRC or Reliable Replacement Component as in Markey et al[26]), but does not subscribe to the "Remanufacture" philosophy of "degradation only within the limits of initial variability"
- CUR: Our current SBSS philosophy is often stated as "you have to prove it *will* work", whereas CUR can be interpreted as "you have to prove it *won't* work" before CUR would employ elements of SLEP. "Best Combo" allows a graded scale middle ground, where assessed quantitative certification metrics are held above an achievable standard, which can be attained at a price less than that of the current "SBSS with SLEP". Therefore, "Best Combo" avoids the unreachable goal of "no degradation beyond variability", as promised by REM or SBSS, but stays well above the more lenient standard of "CUR".

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- PAR: "Best Combo" contains an important element of "PAR". "Best Combo for CTBT" keeping each type of nuclear package, to maximize stockpile diversity of untestable (nuclear) components, for as long as possible. This has an important advantage in that, by keeping the maximum number of types of nuclear packages, we can then choose the "PAR" option for one of them should a rebuild be so costly that it would exceed the stockpile value of that system. This decision can be quantified using the BCR[15]. However, if the variety of nuclear packages is reduced with poorly planned choices (a danger of the current SBSS with SLEP option), this forces us to either forgo the PAR option, or to retire too many types of nuclear packages and lose stockpile diversity, or to face an extremely costly SLEP because we have too few nuclear packages to retire yet another one. "Best Combo" stresses to maximize the benefit / cost balance between PAR and SLEP.
- UGT: While nothing can preclude the necessity to return to testing, "Best Combo" seeks and quantifies the maximum adherence to the existing nuclear test base, and maximum retention of stockpile diversity so that for any given nuclear package design, PAR is always a last option before UGT would be necessary.
- SNE "Sustaining the Nuclear Enterprise": Pursuit of SNE may eventually narrow our strategy choices from seven down to two – only SNE and UGT will remain if we pursue SNE, RRW and pursue elimination of the current, tested stockpile. "Best Combo" allows a reduction in the number of Operationally Deployed weapons, a number we can at long last report[29] to show progress in meeting the Bush-Putin agreement goals. This can be achieved while also sustaining a high Quantitative Certification metric (see Table 2), and while reducing the number of non-deployed warheads due to the preservation of stockpile diversity inherent in "Best Combo for CTBT". In addition, unlike "SNE", the "Best Combo" option does not preclude shifting to any of the other seven strategy options at any time; "Best Combo" is not a one-way street into a blind (read untested) alley.
- RRW: "Best Combo" would implement RRW in the spirit of "RRC" or Reliable Replacement Components as in (Markey et al, 2005)[26], and limit the ambitious "URW" or Uncertain Replacement Warhead misnomer of RRW to paper studies until the paper "URW" designs can have their reliability assessed so as to credibly live up to the RRW name. Whether one uses the original (year 2010) or new (2014) Campaign goal dates (GAO, 2005)[10], or the more explicitly planned dates in the document containing "Best Combo" (beyond 2015 for hierarchical validation of changes[17]), the "Best Combo" option would mandate that we move closer to the nuclear test base, enhancing the validation pedigree of any RRW, and avoiding "conscious movement away from the test base" beyond modest paper studies until certification can be quantified and proven.
- DoD Accommodations: "Best Combo for CTBT" recommends specific DoD efforts to allow their platforms and other maintenance, logistic, and operational plans to accommodate conditions closer to the test base to maximize CTBT era certification. This involves implementing certain recommendations discussed or implied in materials related to operational environments in the 1999 "30-Day Study"[22a], Hostile Environment certification[23], boost gas quality[23, 24], and the APS paper on the Modern Pit Facility[31]. We estimate that about $300M per year would have to be earmarked, likely by Congress as done this year with the proposed realignment of the RNEP funds (Hobson et al, 2005), for motion from NNSA nuclear package activities to DoD and contractors for work needed to accommodate "Best Combo for CTBT".

A Graphical Comparison of Seven Stockpile Strategies:

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Table 1 reproduces and augments Table ES-1 from (Civiak, 2000)[16], showing the same 4-star ratings as in that study, along with an arithmetic and geometric average for each of the five Civiak options. Also shown is an evaluation due to this work of the 4-star ratings for "Best Combo for CTBT"[17], the new design variant of RRW (RRW+NEW) as described in "Sustaining the Nuclear Enterprise"[18], and the validated variant of RRW (RRW+VAL).

We rate "Improving and Modernizing" equally at 3 stars for "Best Combo for CTBT" and "Sustaining the Nuclear Enterprise". This is because "Best Combo for CTBT" has the best potential to improve certification status, but also has some potential to modernize (similar to the "Sustaining the Nuclear Enterprise" philosophy for non-nuclear components, and to the Robinson 2001 comments[27] for nuclear components). The "Sustaining the Nuclear Enterprise" method, with its RRW "NEW design" flexibility, would get 4 stars for ability to modernize, but only 2 stars due to its more uncertain certification status. Hence we give "RRW+NEW" as implemented in "Sustaining the Nuclear Enterprise" an average of 4 and 2 or 3 stars.

We give "Best Combo for CTBT" 1 star for cost, since it shows a 5% cost reduction (Nitta and Logan, 2004) compared to the current "SBSS with SLEP" as planned. We generously gave "Sustaining the Nuclear Enterprise" or the "RRW+NEW" variant 2 stars for cost for its promises of cost reduction, but are cautious because we have not seen any form of life-cycle, stockpile-wide plan, including quantitative certification without nuclear testing, that shows these alleged cost savings.

In that spirit, we continue with Table 2, which reproduces and augments the Table ES-2 of Civiak, and shows estimated costs for each of the 7 strategies. As shown in Table 2, (scaled to the current dollar values used in the Civiak 2000 study), the added (DoD) $300M per year for "Best Combo for CTBT" is offset by an approximate savings of $500M per year compared to the current SBSS and SLEP plan, for a net savings of about 5% in budget for "Best Combo for CTBT" instead of "SBSS with SLEP".

Table 2 also includes a composite Quantitative Certification metric across the stockpile. This metric, explained more fully elsewhere[17], is a combined, inseparable metric to assess the state of the stockpile warheads in combination with the abilities of our stewardship tools to make that assessment. We have estimated the Quantitative Certification metric[17] for the four strategies given by Civiak[16], and also present metric values for "SBSS+SLEP", for "Best Combo for CTBT", for the "RRW+NEW" variant, and for the "RRW+VAL" variant.

According to this model-based assessment, we could improve our Quantitative Certification metric by adding a return to nuclear testing (at tremendous political and social cost) to the current state of "SBSS+SLEP". But we could do much better than either one by pursuing "Best Combo for CTBT" without a return to testing. The same information as Tables 1-2 is presented in Figures 1-4. Figure 4, a cursory assessment of the Benefit / Cost Ratio BCR for the eight strategies, shows that if we include a social / geopolitical cost of resumed nuclear testing, **"Best Combo for CTBT", (6th Strategy) perhaps with addition of an RRW validated using national standards for design, validation, and certification (8th Strategy), is by far the BCR winner of the eight strategies.**

We used numbers from the Overskei[6] report to illustrate approximate Quantitative Certification metrics, costs, or projected cost savings for the 7th "Sustaining the Nuclear Enterprise" option, as this option so far has only presented a tempting, but qualitative strategy[18].

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Table 1. Assessment of (Eight) options for managing the US Nuclear Weapons Stockpile (After Civiak, 2000 for TriValley Cares)[16]

	SBSS+SLEP	Remanufacture	Curatorship	Passive Arms Red	Return To Test	Best Combo CTBT	RRW+NEW+QMU+(PAR)	RRW+VAL+QRC+BCC
Maintaining Weapons Safety and Security	•••	••••	••••	••••	••••	••••	••••	••••
Maintaining Reliability and Performance	•••	••••	•••	••	••••	••••	••	••••
Inventory and Maintaining Nuclear Weapons	•••	••	•	○	••••	•••	•••	•••
Supporting Arms Control and Nonproliferation	•	••	•••	••••	○	•••	•	••
Controlling Costs	○	•	•••	••••	○	•	••	•
Minimizing Adverse Environmental Impacts	••	••	•••	••••	○	•••	•••	•••
Average	2.0	2.5	2.5	2.0	2.0	3.0	3.5	3
Geometric Mean	1.8	2.2	2.2	1.7	1.7	2.9	3.3	2.9

Table 2. Representative Annual Funding ($M) for (Eight) options of Table 1 (After Civiak, 2000 for TriValley Cares). Added is a circa-2025 estimate of "quantitative certification status" as in (Nitta and Logan, 2004); this number trades off against funding; see BCR in Figure 4.

	SBSS+SLEP	Remanufacture	Curatorship	Passive Arms Reduction	SBSS+SLEP with Return To Testing	Best Combo CTBT	RRW+NEW +QMU+(PAR)	RRW+VAL +QRC+BCC
Science and Technology	2150	1275	700	300	2200	1850	1878	1850
Surveillance and Testing	725	725	730	540	750	725	687	725
Manufacturing	1725	1075	1000	680	1850	1625	1587	1525
Other (incl. D&D, Accommodation)	300	250	220	180	300	680	278	680
Total	4900	3325	2700	1700	5100	4880	4430	4780
2025 Quantitative Certification Score	5.0	4.0	2.8	1.8	7.8	8.0	4.8	8.0

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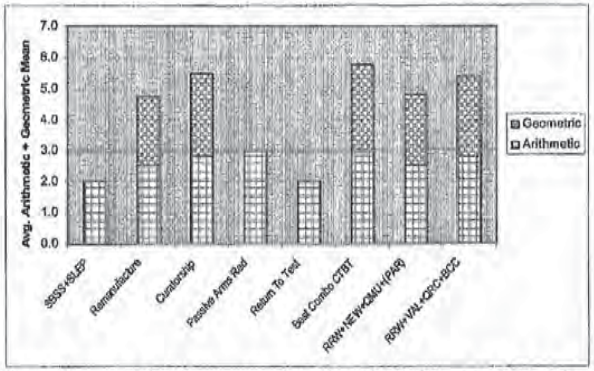

Figure 1. Assessment of (Eight) options for managing the US Nuclear Weapons Stockpile; arithmetic and geometric average scores. Scores for first 5 strategies taken from Civiak[16], 6th, 7th and 8th are estimates from this work.

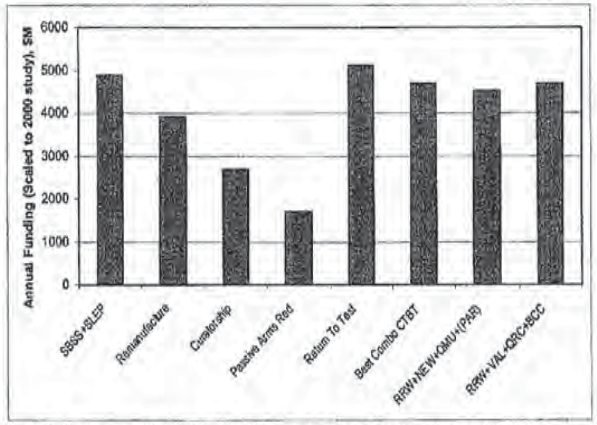

Figure 2. Assessment of (Seven) options for managing the US Nuclear Weapons Stockpile; annual cost, $M scaled to 2000 Civiak study. Costs for first 5 strategies are taken from Civiak[15]. 6th is derived from Nitta and Logan[17], 7th claims cost savings of 8% vs. SBSS+SLEP[6].

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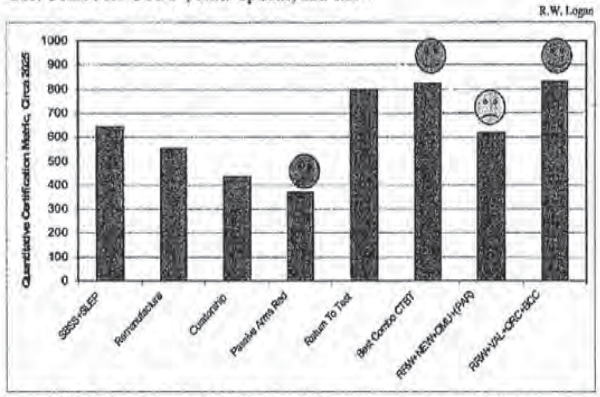

Figure 3. Eight options for managing the Nuclear Weapons Stockpile. Quantitative Certification metric estimate for the year 2025; values and methods from Nitta and Logan[17], and Booker et al[32]. "RRW+NEW" Quantitative Certification metric is taken from a sample system with high margin but minimal number of tests. "RRW+VAL" metric is taken from a "Best Combo" style RRW system.

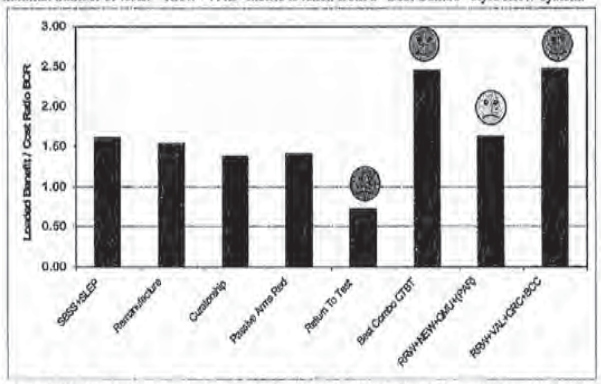

Figure 4. Eight options for managing the Nuclear Weapons Stockpile; Fully loaded Benefit / Cost Ratio BCR estimate for the year 2025; values from Table 2, methods from Nitta and Logan[17], and Booker et al[32]. We add a somewhat arbitrary social cost of $10B/yr for the "Return to Testing" strategy. BCR for "Sustaining Nuclear Enterprise" / RRW+NEW uses NWCTF[6] costs.

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Conclusion:

"Best Combo" is summarized as a 6th option that adds to the set of five strategies for the nuclear weapons stockpile discussed in Civiak, 2000. We believe that "Best Combo for CTBT" is also the "quietest option", involving plenty of scientific, rigorous, quantitative challenges in the spirit of SBSS, but avoiding the "new weapons" image created by ACI, RNEP, and possibly RRW+VAL augmentations to the stockpile. These RRW+VAL variants, if implemented with a design, validation, and certification process that makes use of standards with a national pedigree, could approximately equal the quantitative certification numbers achievable with "Best Combo for CTBT".

The RRW variant stressing new nuclear designs (RRW+NEW), in the spirit of "Sustaining the Nuclear Enterprise" as proposed recently, contains admirable goals, but runs dangerously close to being viewed as another "new weapons initiative", and if implemented at the expense of SBSS and SLEP, could either risk our current certification or trigger an otherwise needless return to nuclear testing. The ease of "QMU certification" and cost savings promised by "Sustaining the Nuclear Enterprise" are tempting, but not enough detail has been provided to choose "Sustaining the Nuclear Enterprise" as an option and consciously abandon the others.

Our recommendation is similar to the recommendation following the five-option study of Civiak in 2000. With eight options on the table, perhaps a revisit of all of them (and any others!) is in order before we change course and incur the inevitable "decision costs" of doing so. We suggest that this revisit be performed by several independent study groups, and that a variety of quantitative certification and benefit / cost metrics be used; we provide one example set with the BCR and the Quantitative Certification Number used in Table 2 and Figures 3-4, but stockpile-wide comparisons should be made using several selections of metrics.

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20 Reviewed as UNCLASSIFIED by RW Logan ADC and XXX of OCEC 24 Mar 06

Logan, Yoanne
Page 1 of 1

1|16A; 2|14O

Dear DOE, April 22 '08

You are frightening life on earth with new nuclear weapons.

Please don't make them — they are too dangerous! Someday one will ex plode and stark Winter ALL

PC 930

Only you could have done something so special

Thank You

Yoanne Logan
0438 N. Skokie
Skokie MD 63130

Long, Suzanne

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PC_1870

Levens, Matthew

From: suzanne long [slong79@hotmail.com]
Sent: Friday, March 28, 2008 9:24 AM
To: Complex2030
Subject: homeland security

suzanne long
3232 west 102nd street
bloomington, MN 55431-3201

March 28, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|9A I am against funding by any government entity or method of any project or plan so do with nuclear weapons or power.

2|7A There are far better alternatives that need development which are safe compared to neclear.

3|16A The risk is too great. Our power and greatness must be achieved by intellectual and compassionate means or the arsenal means nothing.

There is no doubt in my mind that this is a scheme to make a lot of money for a few and that is has no foundation in the security of our country.

As well, it is provocative.

4|8A Congress rebuked the Energy Department's last attempts to upgrade the arsenal by defunding the Reliable Replacement Warhead and last year's proposed mega-scale bomb plant. The CMRR project is another irresponsible
3|16A (cont.) new program that should be rejected.

Sincerely,

suzanne long
9528358981

1

Lopez, Horacio

Page 1 of 3

MBDA MINORITY BUSINESS DEVELOPMENT AGENCY

Nevada Minority Business Enterprise Center
Funded by U.S. Department of Commerce / MBDA

Operated by: New Ventures Capital Development Company

PC_928

April 15, 2008

Mr. Ted Wyka
National Nuclear Security Administration
1000 Independence Avenue, SW
Washington, DC 20585

Subject: ***Omission of Nevada disadvantaged businesses in the "NTS Environmental Characterization and Remediation Services proposal for DOE NNSA/NSO"***

Dear Mr. Wyka,

On behalf of the Nevada Minority Business Enterprise Coalition (MBEC) composed of the Nevada Minority Business Enterprise Center, MBDA, U.S. Department of Commerce; National Association of Minority Contractors, Nevada Chapter; Nevada Latin Chamber of Commerce; Nevada Minority Business Council; National Association for the Advancement of Colored People and the Small Business Development Center, UNLV, we protest the furtherance of the "*NTS Environmental Characterization and Remediation Services proposal*" and request the following

A new pre proposal conference and proposal due date be scheduled

1|20 ***Diversity and local business participation be a required agenda item for discussion at the conference***

Contractors submitting proposals will include Nevada minority-owned firms as team members in their new proposals

Inclusion of a Nevada minority business enterprise coalition representative in the evaluation team to ensure fairness and equity

NNSA/NSO and Albuquerque be sensitized and directed to ensure diversity and community participation in the expenditures of public money

This protest is based on the following information. On January 17, 2008, (MBEC) submitted correspondence to Gerald Talbat, Site Manager, NNSA, NSO, to introduce the coalition. We invited NNSA/NSO to join us at our next meeting to discuss the state of minority business enterprise in Nevada. Key issues were to include NNSA/NSO appropriations; current and projected solicitations; teaming and mentor/protégé arrangements in future projects and formulation of a strategic alliance for mutual support. No response was forthcoming to our correspondence and telephone calls were ignored.

626 South 9th Street, Las Vegas, NV 89101 702.382.9622 Fax: 702.382.8375 www.NMBEC.com

Lopez, Horacio
Page 2 of 3

MBDA MINORITY BUSINESS DEVELOPMENT AGENCY
Operated by: New Ventures Capital Development Company

Nevada Minority Business Enterprise Center
Funded by U.S. Department of Commerce / MBDA

1|20 (cont.)

On April 13, 2008, TPMC-Energy Solutions Environmental Services, LLC, featured an open letter to the employees of Stoller-Navarro, current contractor, offering them employment in the event of them becoming the successful bidder. Communications with TPMC indicated that the proposals are due May 13, 2008 at the Albuquerque Office and that teams have been formulated and proposals finalized. They provided MBEC with the other plan holders, as compared to NNSA/NSO disregarding our inquiries.

Dialogue with the disadvantaged business community shows disgust, frustration and oftentimes hopefulness in dealing with the federal system. The Small Business Administration (SBA) local business development arm has been dismantled, 8(a) firms have to contact Phoenix and/or Washington DC for service and NNSA/NSO apparently is being managed by the Albuquerque, New Mexico, office.

Federal expenditures in Nevada must have proper oversight by our congressional delegation to assure that such actions transpire on a timely, effective and productive basis.

With regards,

Horacio Lopez
MBEC Coalition Coordinator

Ernest Fountain, President
NMBEC, MBDA, U.S. Department of Commerce

Cc:

Harry Reid, U.S. Senator, Nevada
John Ensign, U.S. Senator, Nevada
Shelley Berkley, U.S. Congresswoman, Nevada
John Porter, U.S. Congressman, Nevada
Dean Heller, U.S. Congressman, Nevada
Gerald Talbat, NNSA/NSO
Ernest Fountain, President, NMBEC, MBDA, U.S. Dept of Commerce
Otto Merida, President, Latin Chamber of Commerce
Diane Fontes, President, Nevada Minority Business Council
Larry Vierra, Director, Small Business Development Center, UNLV
Ruben Vasquez, President, Nat'l Association of Minority Contractors
Leonard Hamilton, Committee Chairman, NAACP

626 South 9th Street, Las Vegas, NV 89101 | 702.382.9522 | Fax: 702.382.0375 | www.NMBEC.com

Lopez, Horacio
Page 3 of 3

January 17, 2008

To: **Mr. Gerald Talbot, Site Manager**
National Nuclear Security Administration (NNSA)
232 Energyway
North Las Vegas, Nevada 89030

Fr: **Horacio Lopez, Coordinator**
Public Sector Division
Minority Business Enterprise Coalition (MBEC)

Re: NNSA & MBEC meeting

This correspondence is to introduce the ***Nevada Minority Business Enterprise Coalition*** (MBEC) to you and your primary contractors.

MBEC is an alliance of business resource centers committed to the enhancement and promotion of *local* minority-owned firms. The attached mission statement lists members of the coalition and scope of work.

Disparity studies and surveys indicate that minority business enterprises in Southern Nevada are not afforded adequate or fair participation in the procurement and contracts awarded in our area. This situation must be remedied and MBEC and major contractors need to assure that this practice ceases.

A meeting is requested with you and representatives of your major contractors at NNSA to discuss the following:

- Status of minority business enterprises in Southern Nevada
- NNSA (Nevada) appropriations
- Current and projected solicitations
- Teaming and mentor/protege arrangement in future projects
- Strategic agreements between your agency and MBEC
- Other matters of mutual concern

Our monthly meetings are held at the Las Vegas Latin Chamber of Commerce Board Room, 300 North 13th Street, the first Tuesday of each month. The next meeting is scheduled for February 5, 2007 at 9:00 A.M. Please advise if this date and time is feasible. Also, joining us at this meeting will be representatives of our congressional delegation.

We thank you for your anticipated support and look forward to a beneficial relationship.

Lorenzo, Leonora
Page 1 of 1

PC_2036

Levens, Matthew

From: leonora lorenzo [leonoralives@yahoo.com]
Sent: Monday, April 28, 2008 4:18 PM
To: ComplexZ030
Subject: Fence to Fence Clean Up

Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager, Office of Transformation, NA-10.1 U.S. Department of Energy/NNSA 1000 Independence Avenue, SW Washington, D.C. 20585

Dear Mr. Wyka,

1|4A We The People of New Mexico need more time to bring the question of the proposed Complex Transformation to our elected officials, therefore, the "No Action Alternative" is the only reasonable option to follow at this point.

2|1K It is crucial for our political leaders to be involved, and to be in favour of such an important undertaking. Congressional races are up for elections and the outcome will, one prays, create an entirely new political terrain in our state. What is more, a new
3|1C President will write a new Nuclear Posture Review so it is very unwise for NNSA to begin to embark upon a project of such enormity when our politics, environment and economy are on the verge of such change.

4|7J The only "Action Alternative" that will benefit the well being and safety of the citizens of New Mexico, and the one that the future generations whole heart-idly support is the is "Fence to Fence Clean Up". This is the "Action Alternative" requested by the New Mexico Environment Department. Please respect the rights of "Life, Liberty, and Pursuit of Happiness" of our future generations.

Sincerely,
Leonora Lorenzo, Santa Fe

Be a better friend, newshound, and
know-it-all with Yahoo! Mobile. Try it now. http://mobile.yahoo.com/;
_ylt=Ahu06i62sR8HDtDypao8Wcj9tAcJ

Loux, Robert
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PC_967

JIM GIBBONS
Governor

STATE OF NEVADA

ROBERT R. LOUX
Executive Director

OFFICE OF THE GOVERNOR
AGENCY FOR NUCLEAR PROJECTS
1761 E. College Parkway, Suite 118
Carson City, Nevada 89706
Telephone: (775) 687-3744 • Fax: (775) 687-5277
E-mail: nwpo@nuc.state.nv.us

April 8, 2008

Mr. Theodore A. Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Avenue, S. W.
Washington, D.C. 20585

Re: Comments on DOE's Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement (DOE/EIS-0236-S4)

Dear Mr. Wyka:

The Nevada Agency for Nuclear Projects provides the following comments on DOE/NNSA's Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement (DSPEIS). The State of Nevada's December 15, 2006 *Comments on DOE's Notice of Intent (NOI) to Prepare a Supplement to the Stockpile Stewardship and Management Programmatic Environmental Impact Statement – Complex 2030 (Federal Register, Vol. 71, No. 202, October 19, 2006, p. 61731 – 61736)* are herein incorporated by reference to the extent that they apply to the currently proposed Complex Transformation alternatives.

1|14F4; 2|10D; 3|5 Nevada contends, as it did in its comments on the October 2006 NOI, that the Nevada Test Site (NTS) is an unsuitable location for consolidating plutonium and special nuclear materials (SNM) facilities under any of the alternatives evaluated in the DSPEIS. DOE/NNSA has appropriately recognized this fact by not proposing such uses for NTS in its Preferred Alternatives that are identified in the DSPEIS (section S.3.17).

4|14E15; 5|14.O Even though NTS is not considered a preferred alternative for consolidating plutonium and SNM facilities, the DSPEIS nevertheless fails to adequately address key concerns raised by Nevada in its December 2006 comments on the Complex 2030 NOI including, but not limited to, the fundamental problems with the NTS site itself, cumulative impacts associated with the proposed Yucca Mountain high-level radioactive waste repository program as well as current and future activities at NTS, the transportation of SNM both in Nevada and nationally, and the

Loux, Robert
Page 2 of 4

proposed relocation of NNSA flight operations from the Tonopah Test Range to another Department of Defense (DoD) facility.

NTS is unsuitable for SNM facilities

4|14E15 (cont.)

- The NTS is located in an area of major seismic risk. In the last 20 years, there have been over 620 earthquakes in and around the NTS, the largest a 5.6 magnitude in 1992. The DSPEIS should have considered that earthquakes of 7.0 or greater magnitude are possible in this area.
- At NTS, substantial surface and subsurface contamination left over from weapons testing activities already exists. Even a small additional increment in radiological contamination, especially groundwater contamination that may be associated with the proposed plutonium processing and storage operations, is unacceptable.

The DSPEIS fails to Adequately Assess Cumulative Impacts

6|14O5; 4|14.E.15 (cont.)

- The DSPEIS does an inadequate job of assessing cumulative impacts from other DOE/NNSA activities at NTS. Major low-level radioactive waste (LLW) and mixed waste (MLLW) operations at Areas 5 and 3 are expected to continue while the proposed Complex Transformation activities are in operation. Cumulative impacts associated with these NTS activities should have been comprehensively addressed in the DSPEIS.
- Currently, heavy volumes of LLW and MLLW are being shipped to the NTS from numerous generators throughout the Nuclear Weapons Complex. Planned shipments of large volumes of Spent Nuclear Fuel and High-Level Waste, along with plutonium and SNM associated with proposed Complex Transformation activities will cause cumulative impacts on state and national highways. The DSPEIS does not comprehensively assess such cumulative impacts.
- For more than 40 years, NTS and at least two other locations in Nevada outside the NTS were used for above and below ground nuclear weapons tests, resulting in a legacy of surface and subsurface contamination. Groundwater contamination just from existing radioactive materials left over from weapons tests is massive, has the potential to migrate off-site, and will persist over an extremely long time period (i.e., hundreds, even thousands, of years). Health effects from the weapons testing era are still occurring. Existing groundwater contamination caused by nuclear testing beneath the NTS covers some 300 square miles. The DSPEIS should have thoroughly evaluated the cumulative impacts associated with any proposed Complex Transformation SNM facilities at NTS.
- If the Yucca Mountain project goes forward, at least 70,000 metric tons of highly radioactive waste (a figure that could reach 120,000 MTU or more under credible alternative scenarios) would be transported to Nevada from around the country, resulting in tens of thousands of shipments over a period spanning four decades. As such, Yucca Mountain will have significant, pervasive, and long-lasting impacts on Nevada and on communities throughout Nevada – impacts that will unavoidably interact with and exacerbate impacts from any proposed Complex Transformation facilities. Such impacts include potential stigmatizing effects of the proposed alternatives as well as transportation accidents or incidents associated with Complex Transformation operations.

Loux, Robert
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5|14.O (cont.)

- The DSPEIS should also have evaluated cumulative impacts from existing and future operations at the Nevada Test and Training Range (Nellis Range).

Inadequate Assessment of Plutonium and SNM Transportation Impacts

7|14L1

- The DSPEIS fails to contain an adequate route-specific analysis for each proposed plutonium center and consolidated SNM location that would allow risks and impacts to be compared among alternatives. Such analyses can be done without compromising the security aspects of the actual shipments, when and if they occur.
- Because truck transport is the only available option to a NTS facility[1], shipments of SNM would impact the heavily populated and congested Las Vegas Valley. The impacts of such shipments are not addressed in the DSPEIS.[2]

Relocation of Tonopah Test Range (TTR) Flight Test Operations

8|6C1

- The DSPEIS does not provide adequate information or analyses to justify a decision to relocate NNSA flight test operations from the TTR to White Sands or another DOE or DoD facility. In addition, the analysis of impacts to the economy of Nye County and the Tonopah area is wholly inadequate. Nevada again strongly urges DOE to adopt the "no action" alternative for this portion of Complex Transformation activities and retain existing operations and facilities at the TTR.

Consistency with Authorized Land Uses at NTS

9|10D1

- The DSPEIS also fails to address the issue of authorized land uses at NTS and whether consolidated SNM facilities at the Nevada site would be consistent with the mission of the NTS as authorized in the existing land withdrawal legislation for the site.

Past Problems With Plutonium and SNM Facilities

10|14M12

- The DSPEIS continues to ignore the fact that serious violations of environmental, health, and safety regulations and laws were still occurring at Rocky Flats as recently as the late 1980s, despite the fact that numerous technology upgrades were made to the Rocky Flats facility over the years. Unless management deficiencies are addressed and corrected, there is no reason to expect a plutonium processing facility elsewhere will have a better environmental and safety track record, regardless of the technology employed. The DSPEIS should have comprehensively and objectively addressed the pervasive management and oversight deficiencies at Rocky Flats and their contributions to the environmental contamination and safety violations that occurred at that facility.

[1] The fact that NTS lacks rail access and is some 100 miles distant from the nearest main line railroad further complicates transportation considerably. It would seem logical that strong preference be given to consolidated Complex Transformation sites with adequate rail access, since rail transportation can substantially reduce risks and limit the public's exposure to and contact with radioactive materials shipments. In addition, rail transport of SNM offers significant security advantages over highway transport.

[2] DSPEIS alternatives that use existing plutonium storage/fabrication facilities (i.e., Pantex in Texas or the Savannah River site in South Carolina) as sites for consolidated plutonium and SNM facilities offer significant logistic advantages, substantially decrease risks associated with transportation and handling, and reduce overall program costs.

Loux, Robert
Page 4 of 4

Thank you for the opportunity to provide comments on the Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement.

Sincerely,

Robert R. Loux
Executive Director

RRL/cs
cc Governor Gibbons
Nevada congressional delegation

4

Lovato, Anhara
Page 1 of 6

Anhara Lovato
P.O.Box 114
Tesuque, NM
87674
March 13, 2008

PC_1030

RE: Recommendations to the hearing to review DOE and LANL's proposal to begin weapons production of A Bomb triggers in Los Alamos 2008. & the SPEIS addressed to the: NNSA/DOE

Copy of speech given March 1, 2008:

My name is Anhara Chase Lovato.
I am a citizen of the United States of America.
I am a daughter of the American Revolution, many of my ancestors participated in building this great democracy.
I am a lifetime citizen of NM.
I am a wife of a man with Hispanic and San Ildefonso roots.
We built our own home in Tesuque.
I am a mother of 3.
I have a MA in at risk youth and am applying for a professional counseling license.

1|16A I want it stated for the hearing record that I am opposed to the making of 1 or 80 0r 150 triggers for atomic bombs in LANL, in the USA or anywhere in the world. because as Nicholas the POPT, I am opposed to the building of the CMRR buildings to build pits in

I want to recommend to DOE, LANL and the Representatives of NM that they consult with the UN,/ United Nations which is responsible for compliance to the NPT signed by America and ratified in 1970, and that they call an emergency meeting with all of the

2|1F 200 nations who signed the NPT to consult with each nation about their proposed plan to make nuclear weapons in LANL. If such plans were known it would greatly alarm the world community and be seen as hypocritical in light of the fact that America bombed Iraq for even thinking of making atomic bombs.

3|1J with a new administration + Domenici retiring -

I want to state that I feel that the NPT is the most important international law in the category of international laws to protect the planet from destruction. I recommend that DOE, LANL and the representatives of NM, if indeed, their intent is to protect the planet from destruction, to join ranks and make international laws to protect our planet from anything, such as global warming, mass animal and plant extinction, number one on that list of anything that could destroy the planet is atomic weapons.

I recommend that LANL and DOE and NM Representatives study the UN and NPT records to remind themselves of the reasons why the whole world has simultaneously laid down their nuclear arms. One reason is that if one nation disregards the NPT and starts A bomb production it arouses suspicion among the other nations which could provoke an

I am opposed to cable opening underground testing + legal compliance to the CTB

trigger production factory since into Stew

Santa Fe, NM

Lovato, Anhara
Page 2 of 6

3|1J (cont) even more terrible arms race than the cold war, advanced weapons technology has made wars obsolete because of the terrible destructive power of atomic bombs. War is a satanic institution and nuclear war, nuclear winter and nuclear waste, even if a nuclear war never broke out could destroy human civilization.

4|2C I recommend that DOE, LANL and NM Representatives consult with the citizen's expert groups in NM such as CCNS, CARD, Los Alamos Study Group, Nuclear Watch and Tewa Women United (to just mention a few) who are the voice of the NM people on the health risks of the nuclear industry.

I want it stated for the record that I want DOE, LANL, and the Representatives of NM to consult with the governors of every tribe, pueblo, reservation of Native Americans in NM as well at The Tewa Women United, about the proposed plans to make LANL into a weapons industry and talk to them about the impact that the nuclear industry has on the native peoples in NM (cultures that exist in no other place in the world and can sometimes draw in many billions of dollars in the tourist industry), the implication of environmental racism in making NM the "sacrifice zone" for all aspects of the nuclear industry and explain why the nuclear industry has been "kicked out" of the other states in discrace.

5|11A I recommend to DOE, LANL and the NM Representatives that the records involving each and every aspect of the nuclear industry in NM and other states be studied thourally, including the records of the disgraceful incompetence and nuclear disasters at each weapons production and storage site and what delineate what causes such nuclear disasters to happen with such regular frequency and why they can't comply with clean air and water standards.

I also recommend that the records of every scientist who opposed nuclear proliferation be studied including the notes from the three brilliant scientists who committed suicide after the bombing of Hiroshima and a psychological study of why there is such a high national average of suicides among the scientists in Los Alamos (and finding work for scientists that they can be proud of) and the records at the weapons productions sites such as Rocky Flats of workers and down winders "dropping like flies" and cancer rates that now attack one in five people in the US, cancers that the Physicians for Social Responsibility say attack swiftly, are more pernicious and quickly kill people.

I recommend that DOE review the long list of organizations that backed the NPT and CTB treaties such as the Physicians for Social Responsibility.

I recommend that the hearings on WIPP be reviewed because if the people of the United States run this country it never would have been passed WIPP. More letters were sent to the congress about the WIPP, the first nuclear waste depository then any other issue in the history of the United States most of the letters said, "No, keep radiation where it is and don't move it. Radioactivity bearing trucks will just spread radioactive dust all over the USA"

Lovato, Anhara
Page 3 of 6

5|11A (cont) I recommend that the falsified records regarding the safety of WIPP as a nuclear waste repository be reviewed by LANL and DOE and the representatives of NM and that the true records be reviewed that show that ancient salt bed lakes and rivers beneath WIPP will carry the underground dumping of radioactive waste into the Gulf of Mexico and contaminate the ocean, the world's food supply. The waterways and airways of this world are like blood in a body and recirculate but especially at WIPP. I state that a environmental impact statement be done by DOE and LANL and the Representatives of NM that addresses contamination of the waterways and oceans of the world, of airborn contaminants as well.

6|14E I state that the biggest mistake that LANL and DOE have made is in placing LANL on a hill above a major river, the Rio Grande which has large canyons that take radiation out via large canyons when it rains and into the Rio Grande River. The water down stream from LANL is used by the Cochiti Pueblo, the farmers along the lush river valley for crops, the cities along it such as Albuquerque, carrying radiation all along the river and then carrying radiation out into the oceans, the world's food supply.

7|11D I recommend that LANL DOE and the representatives of NM make an environmental Impact statement for not only the 12 mile radius of Los Alamos (that they have proposed) that encompasses some 50,000 residents including the scientist's own families (who will be at risk to horrific genetic damage if LANL turns from a research into a bomb production site), but to the Espanola Rio Grande valley that is the bread basket of NM. The Hispanic farmers of the Velarde area supply most of NM's corn, beans and chili and many organic farmers supply crops to NM food co-ops like La Mantanita Co op, the Farmers Market and local restraunts like Cloud Cliff wheat cooperatives to make bread from native seeds. Studies that need to be reviewed are those that show that the downwinders from LANL's 33 smokestacks that release radio nucliades that are out of compliance with the Clean Air Act (inspite of lawsuits from CCNS), that research showed, tend to flow in a northernly direction and that Santa Clara, Santo Domingo and San Juan Pueblo are exposed to an inordinate amounts of radiation yearly, which would increase 100 fold with bomb production which is after all a "dirty business."
Invironmental impact statements must encompass the whole region that is exposed to radiation within the whole state of NM and beyond to the whole world via airborn pollutants from LANL.f

I recommend that LANL, DOE and the Representatives of NM study all health records related to humans beings that have been in contact with radioactive materials as part of their Invironmental Impact Statement about their proposed weapons production at LANL.
-The viewers of the first atomic bomb testing which one by one died of radiation related cancers.
-The USA veteran that I heard speak at a hearing who didn't get evacuated from Japan during the atomic bomb explosion at Hiroshima whose children were born deformed, one

Lovato, Anhara
Page 4 of 6

was born with no skin, and his wife contacted cancer from the radiation in his sperm when they were having sexual relations.
-The Tiger Team of LANL that were whistle blowers about hundreds of safety violations who were fired from LANL, their reports should be revisited.
-The workers at weapons research and production labs that were contaminated and died, are numerous in number.
-The high incidence among the miners and mining towns that lived in Southern NM by uranium mine pilings and had an inordinate amount of groin cancer. Radioactivity affects areas of the body that are growing such as fetuses, children, sperm production in the testicles of males that is transferred to females and in the female breasts.
-Cherynoble female residents have a 50% breast cancer rate after the nuclear power plant melt down.
7|11D (cont)
-Residents of Los Alamos already have a way higher than the national average of %age of brain tumors, up to 60 a year because toxic radioactive metals pass over the blood brain barrior into the brain.
-Along with LANL and DOE's studies should include Sternglass's studies on the damage to the fetus of pregnant mothers near nuclear power plant radioactive emissions and down winders from Nevada test sites to non drinking Mormons whose babies were born with the top of their skulls missing and other such genetic damage to fetuses and babies whose cells are growing in the highly vulnerable few celled fetus.
-The inhabitants of Hiroshima after the Atomic bombing who suffered terrible genetic damage, well know that radiation causes genetic damage the reason being that radioactive particles have rays many times stronger than the human body's electrical systems and these particles sit in the body and "knock off genes day in and day out) which is where the genetic cell damage comes from. One particle of radioactivity can do a terrible amount of damage and the half life of a radioactive particles is thousands of years..
-The Sierra Grande nuclear fire in Los Alamos officially burned up 1,000 of the 2,000 known nuclear dumpsites and half of the LANL labs releasing toxic metals and radioactive contaminants 500 miles in every direction. IIS needs to include these nuclear fires that have been a regular occurance in NM and have had disastrous consequences to the health of NM and the surrounding states.

I especially recommend to this hearing that DOE and LANL and the Representatives of NM do a statewide environmental impact statement that analyzes the weapons production complex's complience to the Clean Air Act, and Clean Water Act for the state of NM, detected from DOE's/LANL and other site's past environmental records, which are appalling for the incompetence, irresponsibility and criminal human rights abuses at each and every sit of nuclear production.

I state that the LANL proposal to turn Los Alamos into a nuclear weapons complex requires an Environmental Impact Statement must be made not only for the 12 mile radius around LANL (which is a ridiculiously inaccurate picture of the vast effect on NM and the world that LANL and the bombs produced would have) but for the whole state of NM which has become a "catch all/sacrifice zone" for the entire weapons complex in the USA:

1. mining uranium in Southern NM.

Lovato, Anhara
Page 5 of 6

7|11D (cont)

2. researching dangerous and outlawed nuclear and chemical technologies of mass destruction in LANL in NM.
3. bomb testing in White Sands, NM.
4. the first nuclear dump for the nation at Carelsbad, WIPP, shipping waste from all over the nation to WIPP
5. And now the proposed weapons production of up to 150 A bomb trigger production a year at LANL requiring uranium trucks going up a steep and treacherous hill to LANL to provide the raw materials to form weapons production.
6. Sandia which harbors up to 2,000 nuclear bombs intact with thousands on trigger alert, a prime first target, still subject to computer or human error and very unwisely not put out of trigger alert status, with no time to stop a mistake.

An LANL and DOE Invironmental Impact Statement needs to be made that encompases NM entire population and the borders of NM it's wildlife, water and air and the Rio Grande run off from LANL that run into other states and to the world's oceans.
-The Fertile Rio Grande farmers and it's water.
-WIPP and it's underground rivers that carry contaminants out of NM into the Gulf of Mexico.
-The nuclear fires that LANL that go 500 miles in every direction.
-The water from LANL that get into the SF water basin.
0The nuclear transportation trucks that will travel extensively in NM
-The air born pollutants from LANL that get spread statewide and especially residents in the Santa Fe.

- The Albuquerque area, the storage of bombs at Sandia National Labs and the nuclear wastes from Sandia National Labs that is 60 miles from the LANL.
- The mining of uranium in southern NM and hazards such as nuclear explosions, nuclear spills from trucks, nuclear attacks on NM, nuclear accidents, nuclear emissions from bomb production.

8|14H

LANL and DOE's plans to make LANL into a nuclear weapons complex clash with what NM has become, one of the world's most desirable tourist spots for the Native dances, the art mecca and by dollar art industry, people come from all over the world to NM which has become a healing mecca for natural healing.

I state that NM is not a "sacrifice zone" for an outlawed and rouge nuclear industry but that NM has a great spiritual destiny that has nothing to do with the nuclear industry.

Since the NPT has outlawed nuclear proliferation, to zero nuclear weapons on our planet eventually, LANL scientists will be pressed into service to use their brillient minds to clean up the nuclear mess that they have made. The scientists have created the technology of nuclear industries and so they need to be the ones to make the technology that can spot a nuclear particle from space and utterly outlaw any hint of nuclear materials.

Lovato, Anhara
Page 6 of 6

2|1F (cont) LANL's plans clash not only with the international NPT but in making NM "a sacrifice zone" in a place of minority people's is coming the crime of "environmental racism" and a crime against humanity and a crime against the US constitution which guarantees the rights to "life liberty and the pursuit of happiness" to it's citizens.

*****As a counselor I would like to make these comments:*

5|11A (cont) I would like to see psychological studies done that pin down the idealogy that is fueling the nuclear madness and outdated arms race mentality. I have talked to one nuclear weapons promoter who told me, "That human beings are essentially evil and so atomic bombs are the only way to control them." This is playing God. Let's trust in God and that human nature is good and that as humanity matures they can solve problems with consultation.

I would like to mention that I heard LANL scientists talking in a newspaper from Los Alamos, "That there are too many people in the world, overpopulation is our problem and so the nuclear waste and bombs that kill people will do the world good." This Hitlerian way of thinking lacks any humanitarian concern for the people of NM.

I would like to do a study about how the Christian fundamentalist concept of the end of the world ties into the production of atomic power. Many extremist tie this what I think is a misunderstandings of the Biblic prophecy. The end of the cycle of Adam to Mohammed is over and a new cycle is beginning.

I'd like to hold the Baha'I religion up to the world as a model of a religion that runs it's communities and solves world problems through consultation. I recommend that LANL consult with the neutral Universal House of Justice and the Baha'I branch of the United Nations about world issues of concern such as the NPT. Baha'ullah, prophet founder of the Baha'I Faith said that, "There ruinous wars will pass away." That the unity of our ploanet will be accomplished when one thing changes in the world, "That humans start to realize that we are one interconnected world, that all races are one family, that all religions have the same golden vein of truth, that all nations are like families that need to help each other. The Baha'I Faith is run through consultation, justice, equality and neutrality. World Unity is our destiny, not nuclear annihilation. I feel that the world is the place of training for human souls and that it belongs to noone. When our spiritual reality is realized then greed for money and power and wars and taking over nations has no meaning. I feel that humans without Divine Teachers are worse than animals. All humans have to realize that creation has a greater plan than our own and just let peace unfold. The time for peace is now.

Science without religion is a frankensteen monster - religion without science is superstition -

Sincerely
Anhara Lovato
983-5564

Lovelace, Claire
Page 1 of 1

PC_1730

Levens, Matthew

From: Claire Lovelace [clairejlovelace@embarqmail.com]
Sent: Wednesday, March 26, 2008 10:32 AM
To: Complex2030
Subject: Public Comment on Complex Transformation

To the National Nuclear Security Administration:

1|1F I attended a portion of the public hearing in Oak Ridge on February 26. I am appalled that the NNSA is proposing continued production of nuclear weapons in clear violation of the international Nuclear Non-Proliferation Treaty! If we continue to produce nuclear weaponry in opposition to our treaty obligations, we will not be able to prevent global
2|1J proliferation and an undeterrable terrorist bomb. We must provide leadership among the world's nations toward the prohibition and verifiable elimination of all nuclear arsenals and bomb material. This position is pro-national security. It is not just the idea of "a few peace activists" as portrayed in some of the media. It is supported by a bipartisan
3|16A super-majority of America's top foreign policy officials, including Reagonites Henry Kissinger and George Shultz. Nuclear weapon abolition is a serious policy option given support by two-thirds of the 24 living former national security advisers and secretaries of state and defense from both of the U.S. major political parties. They visualize a nuclear-free world, and so must we all.

4|7O Building a new Y12 plant in Oak Ridge, as in NNSA's preferred proposal, is in diametric contradiction to this vision and this hope for the future of humanity on planet Earth. I support the alternative of NO PRODUCTION of nuclear weapons.

Claire Lovelace
113 Heritage Place Drive
Jonesborough, TN 37659
423-753-9388
clairejlovelace@embarqmail.com

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Luborsky, Peter
Page 1 of 1

PC_1189

Levens, Matthew

From: Peter Luborsky [pdluborsky@gmail.com]
Sent: Thursday, March 27, 2008 4:19 PM
To: Complex2030
Subject: proposed development of new nuclear weapons

Peter Luborsky
PO Box 28
Kimberton, PA 19442-0028

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|1J Common sense says that developing new nuclear weapons will only feed a new arms race. Please do not fail to block the new nuclear weapons project--our future depends on eliminating nuclear weapons from the world, not developing new ones. The US. should show leadership instead by resolving on nuclear disarmament and initiating the confidence-building steps necessary to begin it.

Sincerely,

Peter Luborsky
215-627-0861

Lubowicki, Holly
Page 1 of 1

PC_502

Buenaflor, Justin

From: Holly Lubowicki [hollyhiker@hotmail.com]
Sent: Wednesday, January 16, 2008 8:32 PM
To: Complex2030
Subject: Citizen Comment regarding SPEIS, Complex Transformation

Mr. Wyka:

1|16A; 2|14m3; 3|3A It's the wrong direction. The U.S. citizens do not want to add to the arsenal of nuclear weapons, but would prefer to reduce it. Isn't a supply that will last 3/4 of this century enough? We don't even know how to effectively deal with the nuclear weapons we currently have, given the issues of waste, storage and the safety of those who are involved in their production.

4|9B As the Department of Energy, I would hope it would be your main goal to pursue clean, renewable energy and ridding our country of nuclear waste and weapons.

Holly Lubowicki
1607 Cromwell Ave.
Flint, MI 48503

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Ludemann, Susan

Page 1 of 1

PC_1547

Levens, Matthew

From: Susan Ludemann [sludemann@earthlink.net]
Sent: Tuesday, April 15, 2008 5:05 PM
To: Complex2030
Subject: No more nuclear weapons or nuclear weapon components!

Susan Ludemann
52485 Old Stage Rd.
La Pine, OR 97739-9449

April 15, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I strongly oppose this country's stance as a "Christian nation" that war is permissible. I am especially appalled that this country has become an aggressor. On this basis alone I feel justified in opposing any additional nuclear weapons or components being built.

2|1J More importantly, I cannot justify the United States possessing WMDs while declaring that no countries that are currently nuclear weapons free must remain so. If other countries are to be denied these weapons "due to the potential for abuse", then all countries should be denied their possession.

As a pastor I am firmly committed to non-violent means of resolving disputes. That was, and continues to be, a central part of Jesus' message to the world. Weapons of mass destruction do nothing to further the cause of a just peace; they only encourage the abuse of power by the powerful.

I fully expect each of you, as my representative vote, to vote against any measures that encourage or permit the United States of America to expand its nuclear weapons capability.

Sincerely,

Susan Ludemann
510-710-5677

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Luginbill, Betty

Page 1 of 1

PC_820

Levens, Matthew

From: Betlug@aol.com
Sent: Monday, April 07, 2008 11:05 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|16A; 2|1D If you want to fight terrorist, fight as Greg Mortenson or Prof. Yunus Mohammud in the respective books, "Three Cups of Tea" and "Banker to the Poor." If you love this country, consider what it means to protect it legitimately and not, I repeat, and NOT design or produce NEW NUCLEAR WEAPONS.
Sincerely, Rev. Betty Luginbill 8260 W. Echo Falls Ln.
Boise, ID 83714

Sincerely,
Betty Luginbill
8260 W. Echo Falls Ln
Boise,, ID 83714

cc:
Senator Larry Craig
Senator Mike Crapo
Representative Bill Sali

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Lumpkin, Thomas
Page 1 of 1

PC_94

February 22, 2008

Theodore Wyka
Complex Transformation SPEIS Document Manager
U.S. Department of Energy
1000 Independence Ave SW
Washington D.C.

Dear Mr. Wyka.

1|16A I write to express my opposition to the Department of Energy's proposal to rebuild our nuclear weapons complex with new facilities for the purpose of maintaining an enduring stockpile of nuclear weapons and for designing, producing and testing new weapons.

2|1L 3|1J I believe such an effort will have as one of its consequences an even greater effort on the part of other nations to develop nuclear weapons.

4|1F It also seems to me to be a clear violation of the Nuclear Nonproliferation Treaty, of which our country is a signer.

5|20 As a priest of the Catholic Church, it is also a proposal that flies in the face of Church teaching on the need for as rapid as possible nuclear disarmament.

Sincerely,

Fr. Thomas Lumpkin

Fr. Thomas Lumpkin
2640 Trumbull
Detroit, Michigan 48216

Lynch, Henry
Page 1 of 1

PC_497

Buenaflor, Justin

From: Henry J. Lynch [dlynchcfx@yahoo.com]
Sent: Monday, March 17, 2008 6:13 PM
To: Complex2030
Subject: More nuclear weapons

Henry J. Lynch
738 S. Beechfield Ave
Baltimore, MD 21229-4423

March 17, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

2|1J Building this new plant would send a contradictory message to other countries, such as Iran, who may be seeking nuclear weapons. While the U.S. is asking others to forego developing nuclear arsenals, we are simultaneously trying to increase our own capacity to build new nuclear weapons.

Sincerely,

Henry J. Lynch
443-304-2303

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Macarthur, Babara

Page 1 of 1

PC_813

Levens, Matthew

From: Barbara MacArthur [bb50@att.net]
Sent: Thursday, March 27, 2008 11:31 AM
To: Complex2030
Subject: EIS Complex Transformation proposal-T. Wyka

To: T. Wyka

1|9B Rather than using our resources to build this complex, we should be dealing with current and future nuclear waste, as well as nuclear proliferation issues. Don't forget climate change and the water

2|14O problems that are coming with that, to say nothing of what would happen if a nuclear bomb or bombs were exploded by accident...we have been lucky so far.

Barbara MacArthur
Charlevoix, MI

Maccracken, Molley

Page 1 of 1

PC_1995

Levens, Matthew

From: Ivo Burge [ivo@newmex.com]
Sent: Wednesday, April 30, 2008 3:42 PM
To: Complex2030
Subject: los alamos lab

To the powers that be,

1|16A Please reconsider transforming Los Alamos National Lab to the production of plutonium pits. This seems counter productive considering the state of the world today. How about

2|9B using all those resources and brilliant minds to develop alternative technologies and put a real stop to nuclear proliferation. Isn't the most effective leadership strategy to lead by example? Maybe if we weren't so power hungry and war mongering other people would not

3|1J feel that they had to defend themselves from us. Food for thought. Please count this letter as an objection to changing the mission of LANL which happens to be in my backyard, so to speak.

Thank you,

Molley MacCracken

P.O. Box 224
Arroyo Seco, NM 87514

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Machemer, Corona
Page 1 of 1

PC_1949

Levens, Matthew

From: Corona Machemer [coronamach@aol.com]
Sent: Saturday, April 26, 2008 5:27 PN
To: Complex2030
Subject: Opposition to New Nukes

Corona Machemer
200 Cabrini Blvd, Apt 18
New York, NY 10033-1119

April 26, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I am writing to oppose in the strongest possible terms any activities on the part of the administration that could serve the purpose of rebuilding or expanding our nuclear arsenal--in particular, the administration's current proposal to build a plant to produce plutonium pits for nuclear weapons.

2|1J; 3|1F How can Americans, in good conscince, expect others, such as the Iranians, to forego developing nuclear arsenals while we are simultaneously trying to upgrade our own--in violation of the commitment embodied in the nonproliferation treaty to work towards the elimination of such weapons?

1|16A (cont.) Congress opposed the Energy Department's previous attempts to upgrade our nuclear arsenal; it should firmly reject this latest effort as well.

Sincerely,

Corona Machemer
212-740-6788

Macioce, Michael
Page 1 of 1

PC_65

February 7, 2008

Theodore A Wyka
Complex 2030 SEIS Document Manager
Office of Transformation, U.S. Department of Energy, NA-10.1
1000 Independence Avenue, SW.
Washington, DC 20585

Re: Reject the proposed Complex Transformation, the plan to build new nuclear weapons

Dear Theodore Wyka:

1|16A; 2|5C.1 The Department of Energy should reject proposed Complex 2030 project. Scientific experts have stated that the current nuclear arsenal is not faulty.

Please help me ensure that the DOE rejects the Complex Transformational proposal to revamp the nuclear weapons arsenal.

3|14O; 4|1J It's environmentally hazardous, bad foreign policy, and pushes peace further away from reality.

4|1J (cont) By building up its arsenal, the US would essentially be telling the world to "Do as I say, not as I do." Please stop any plans for a modernized nuclear arsenal, so the US can assert its leadership for a global effort to control the nuclear weapons threat.

Sincerely
michael macioce
5062 Alvarado St. Apt A
Carpinteria Ca 93013-1402

Mack, Elma
Page 1 of 1

PC_870

Levens, Matthew

From: Elma Mack [elmamack@hotmail.com]
Sent: Monday, March 31, 2008 11:12 AM
To: Complex2030
Subject: nucular weapons

Elma Mack
400 north Walnut St
west chester, PA 19380-2434

March 31, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|1L i am a 89 year old woman living in a etirement community who is against war.I want to keep my grandchildren from the horror of war. Talk, don't fight

Sincerely,

Elma Mack
6104302280

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Mack, Judy
Page 1 of 1

PC_786

Levens, Matthew

From: williamemack@aol.com
Sent: Wednesday, March 19, 2008 6:54 PM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Theodore Wyka, Complex Transformation SPEIS Manager Office of Transformation, NA-10.1 U.S. Department of Energy/NNSA Washington, DC 20585

Dear Mr. Wyka,

1|3A I am pleased to hear that the Department of Energy is moving forward with plans to consolidate and reduce the facilities, workforce, and redundant capabilities within the nation's nuclear weapons complex.

However, I gather that Complex Transformation also calls for the capability to make more or newer nuclear weapons. We do not need this capability;we still have thousands of
2|1J nuclear weapons, with more in storage. How can we discourage other nations from developing
1|3A new nuclear weapons when we're doing it ourselves? Do what I say, not what I do?
(cont)

3|70 Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE should focus on shrinking the still-oversized nuclear weapons complex and on maintaining the safety and security of our existing weapons arsenal as the size of our nuclear stockpile is reduced.

Sincerely,
Judy Mack
51 Hudson Road
Sudbury, MA 01776

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Mackie, Adam

Page 1 of 1

PC_352

Levens, Matthew

From: Adam Mackie [adammackie@windstream.net]
Sent: Monday, March 24, 2008 9:05 AM
To: Complex2030
Subject: Comment on Complex transformation project

1|10B I am a resident and farmer in Dixon, NM.

2|16A I oppose the planned increase in plutonium production facilities at LANL.

I am opposed to the US increasing its nuclear arsenal.

3|14O I am opposed to the production in Los Alamos: chosen originally as a remote location, it is no longer remote. The threat to the community and environment from incompetence or malfeasance is too great.

Thank you.

Adam Mackie
PO Box 482
Dixon, NM 87527

adammackie@windstream.net

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Mackie, Sandra

Page 1 of 1

PC_1843

Levens, Matthew

From: Rev Sandra Mackie [smackie8@embarqmail.com]
Sent: Friday, March 28, 2008 3:04 PM
To: Complex2030
Subject: No new nuclear arsenals

Rev Sandra Mackie
335 Ridge Ave
Gettysburg, PA 17325-2431

March 28, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|1J Building a new plant to further develop our nuclear arsenal would send a contradictory message to other countries, such as Iran, who may be seeking nuclear weapons. While the U.S. is asking others to forego developing nuclear arsenals, we are simultaneously trying to increase our own capacity to build new nuclear weapons.

Effective leaders lead by example. It is time for US to be an effective and authentic world leader.

Are we truly working for peace?

Sincerely,

Rev Sandra Mackie
717-334-0875

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Mackin, Diana

Page 1 of 1

PC_1736

Levens, Matthew

From: diana Mackin [mommaterra@yahoo.com]
Sent: Friday, March 28, 2008 9:48 PM
To: Complex2030
Subject: Stop new nukes

diana Mackin
486 N Kellogg St
Galesburg, IL 61401-3725

March 28, 2008

Complex Transformation

Dear Complex Transformation:

1|14M.3 There is absolutely nothing safe or sane about nuclear *anything.* We simply do not have solutions for storage of spent rods, for guarantees of safety when power plants are on-line, and for safe handling of all the materials involved in -- and after -- power processing. The idea of a nuclear arsenal is even more preposterous, at least if we hope to keep our planet inhabitable.

2|1J I am deeply opposed to plans to modify nuclear facilities across the country, which would make it easier for the US to rebuild its nuclear arsenal.

3|16A We should spend the billions proposed for this plan on programs to eliminate nuclear weapons entirely, and then on working toward peace.

Sincerely,

diana Mackin

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Maddox, Sonja

Page 1 of 1

PC_789

Levens, Matthew

From: Wyka, Ted
Sent: Tuesday, February 26, 2008 9:25 AM
To: Complex2030
Subject: Fw:

----- Original Message -----
From: Maddox, Sonja (SK8) <maddoxsk@y12.doe.gov>
To: Wyka, Ted
Sent: Tue Feb 26 09:13:58 2008
Subject:

1|15A Mr. Wyka,
2|10I I support Y-12 as the NNSA choice of the Uranium Center of Excellence, including UPF
3|5C2 construction occurring at Y-12.
Thanks for your time.
Sonja Maddox
Knoxville, TN

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Madison, Martha

Page 1 of 1

PC_2055

Levens, Matthew

From: Martha Madison [Mjustine@socal.rr.com]
Sent: Thursday, April 10, 2008 2:17 AM
To: Complex2030
Subject: Citizen Comment regarding SPEIS, Complex Transformation

Mr. Wyka:

1|16A I support elimination of nuclear weapons. Majority of Americans --79% oppose nuclear weapons.

2|1F We have violated the nuclear proliferation treaty. This must be addressed so that nuclear proliferation will not continue.

1|16A (cont) 3|13A1 The most dangerous risk today is accidental nuclear war! If this happens it could be horrific. We know the results of Hiroshima. It is irresponsible to promote nuclear weapons.

4|9B 5|7J The Department of Energy must transition into green energy programs. It must accelerate clean up of nuclear waste. Nuclear waste lasts 500,000 years;

6|14K Nuclear energy is the greatest medical threat posed to life. There is no safe way to prevent the radioactive elements from entering and getting into our food chain. They are highly carcinogenic which will lead in time to be the cause of edpidemics of cancer and leukemia. Children are 10 - 20 more radiosensitive thatn adults - they are more susceptible to cancer.

7|9H I object my tax dollars going to this administration's plan for a nuclear weapons program.

Martha Madison
4119 W. 173rd Pl.
Torrance, CA 90504

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Maestas, Gerald

Page 1 of 1

PC_887

Levens, Matthew

From: gerry maestas [gmaestas@valonet.com]
Sent: Monday, March 31, 2008 2:48 PM
To: Complex2030
Subject: complex transformation

1|15A 2|10B I strongly support the NNSA in it's effort to include Los Alamos National Laboratory in the drive to maintain national security. My ancestors go back hundreds of years in this area and we care about the environment more than most and my experience is such that I have no fear of contamination of the aquifer or the Rio Grande. I am a member of the Northern NM Citizens Advisory Board assigned by DOE to monitor the cleanup activity at Los Alamos and I am very familiar with the threat or potential threat to the environment. I am very comfortable with the situation and I have no misgivings about future activities. LANL employees are also members of the community and they care about the environment as much as anyone and in addition have professional reputations to protect. I might add that the people you heard from at the public hearing in Espanola on 27 March are NOT representative of the Espanola community.

2|10B (cont)

gerald maestas
espanola, nm

Mahaney, Patrick
Page 1 of 1

PC_1663

Levens, Matthew

From: pjm0411@comcast.net
Sent: Saturday, April 05, 2008 1:02 PM
To: Complex2030
Subject: Fund Increased Nuclear Weapons Technology and the Missile Shield

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|15A We need Teddy Roosevelt's "big stick" more than ever as a deterent. And we need the missile shield, which we now know the technology works superbly, to ward off the future threat from aggressive nation states, such as the Chinese communists who are growing their military at an alarming rate.

I look forward to your response and where you stand on this issue.

Sincerely,
Patrick Mahaney
2 Summerhill Ct.
San Rafael, CA 94903

cc:
Senator Dianne Feinstein
Senator Barbara Boxer
Representative Lynn Woolsey

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Makar, Gregory
Page 1 of 1

PC_489

Buenaflor, Justin

From: Gregory L Makar [glmakar@juno.com]
Sent: Monday, March 24, 2008 1:09 PM
To: Complex2030
Subject: Comments on Complex Transformation: no new weapons

To: Mr. Theodore Wyka
Complex Transformation SPEIS Document Manager Office of Transformation, NA-10.1 U.S. Department of Energy

Dear Mr. Wyka,

I'm writing to provide my comments on the NNSA's nuclear weapons Complex Transformation.

1|16A I believe the number of nuclear weapons consistent with the security needs of the United States is ZERO.
I believe any plan to transform the weapons complex should include dismantling all existing weapons, and it should exclude any possibility of new weapons activities.

There are several reasons I've reached this conclusion:

2|1J 1) Non-proliferation is currently dependent in large part on the many countries who could create nuclear weapons if they wanted, but have adhered to their non-proliferation treaty obligations. The U.S. is violating its obligation to work toward abolishing nuclear weapons, and therefore any activities to maintain a nuclear weapons stockpile or develop new weapons can invite nuclear weapons proliferation.

3|9B 2) The weapons complex is expensive and useless. It requires huge amounts of money that could be used for other things that would provide real security for Americans, such as safe and affordable housing, food security, health care security, and safe roads and bridges.

3) Funding is desperately needed to take care of veterans and their families. This would be a much better use of military funding than dumping into the nuclear weapons bottomless pit.

4) Nuclear weapons activities are too dangerous for workers and innocent people to justify having them. They threaten to wipe out humanity without any substantial evidence of benefits.

5) Nuclear weapons are an immoral weapon because their deployment depends on threatening millions of innocent civilians. Because of the nature of the blast, fires, and radiation, I believe it is impossible to use nuclear weapons and affect only military targets.

4|14M.3 6) The concept of a small "nuclear club" that dictates rules to other countries cannot be sustained. Now is the time to end this system and for the United States to lead the world into the post-nuclear weapons world.

Thank you for considering these comments.

Gregory L. Makar
7217 Meadow Wood Way
Clarksville, MD 21029
301-483-8255
GLMakar@juno.com

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Makara, Robert
Page 1 of 1

PC_340

March 22, 2008

Mr. Theodore A. Wyka
Complex Transformation SPEIS
Document Manager
U.S. Department of Energy
1000 Independence Avenue, SW.
Washington, DC 20585

1|13A.1 2|9B There is no reason for pursuing any further a program like "Complex Transformation" that increases the threat of nuclear weapons on this planet. It will take courage to back off from what some believe to be necessary for our security in order to defuse the increasing pressure caused by the proliferation of these products. A program of "Funds Transformation" to human needs that are more positive is long overdue.

3|16A Also long overdue, is the attempt to seek dialogue and mutual trust as a primary pathway to resolving conflicts. Seeking a path of one upmanship in violence potential will inevitably end in "the end." I wish to see America become a leader toward peace through understanding. The centuries past have been ample proof that war leads to more of the same. The only reason why this world has continued to exist is that it has never before had to deal with the destructive power of today's nuclear weapons.

Robert E. Makara
Robert E. Makara
264 Hamilton Court
Grosse Pointe Farms, MI 48236

Makhijani, Arjun
Page 1 of 9

PC_429

ieer

INSTITUTE FOR ENERGY AND ENVIRONMENTAL RESEARCH

6935 Laurel Avenue, Suite 201
Takoma Park, MD 20912

Phone: (301) 270-5500
FAX: (301) 270-3029
e-mail: ieer@ieer.org
http://www.ieer.org

Comments of the Institute for Energy and Environmental Research on the National Nuclear Security Administration of the Department of Energy in its *Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement*
(DOE/EIS-0236-S4), December 2007

Arjun Makhijani, Ph.D., and Annie Makhijani
30 April 2008

1|2A The following are IEER's comments on the National Nuclear Security Administration (NNSA) of the Department of Energy in its *Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement* (Draft SPEIS) for the transformation of its nuclear complex to make it "smaller, and more responsive, efficient and secure."[1] The comments are divided in two parts.

2|2G; 3|2A.1 As a preliminary statement, it should be noted that the NNSA failed to respond to a number of comments that IEER submitted on 17 January 2007 on the *Notice of Intent to Prepare a Supplement to the Stockpile Stewardship and Management Programmatic Environmental Impact Statement – Complex 2030,* October 19, 2006. Specifically, the NNSA did not address

4|1Q
- The environmental impacts of the resumption of testing
- At least one alternative examining a configuration for accomplishment of Complex 2030, now called Complex Transformation, goals without the inclusion of Los Alamos National Laboratory (LANL). On the contrary, Los Alamos is chosen in the "Preferred Alternative" as the site for plutonium pit manufacturing without discussion of the security issues that have plagued Los Alamos.

5|5C1
- The need for any new pit manufacturing, given that existing plutonium pits are expected to have a lifetime in excess of 85 years. Instead, the Draft SPEIS, in its no action alternative, keeps the status quo that consists of the potential production of 20 pits per year at LANL.[2]

6|14O
- The global environmental and security impacts of continued U.S. manufacturing of pits and the global impacts in case the U.S. resumes testing.

[1] Draft SPEIS 2007, p. S-1 (U.S. Department of Energy, National Nuclear Security Administration, *Draft Complex Transformation Supplemental Programmatic Environmental Impact Statement*, DOE/EIS-0236-S4, December 2007, at http://www.eh.doe.gov/NEPA/docs/deis/deis0236S4/index.htm).
[2] Draft SPEIS 2007, p. S-20.

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1|2A (cont)

While we do not expect that the NNSA would agree with our comments, we do expect that if substantive comments are rejected, some reason would be provided by NNSA as part of the analysis of why certain alternatives and details were chosen for analysis and others were rejected.

Each of the comments below contains one or more recommendations for what should be incorporated into the Final SPEIS for it to be a credible and sound document in terms of considering reasonable alternative courses of action and evaluating potential environmental impacts, as required under NEPA.

Introduction

The "preferred alternative" specified in the Draft SPEIS has the following major elements:

- Plutonium manufacturing at Los Alamos National Laboratory, at a rate of 50 to 80 pits (the nuclear triggers of thermonuclear warheads) per year as well as plutonium research and development,
- Manufacturing of uranium warhead components at Y-12, in Oak Ridge, Tennessee, as well as uranium research and development,
- Assembly and disassembly of nuclear warheads, high explosive production, and smaller scale high explosive testing at Pantex, near Amarillo, Texas,
- Storage of Category I and II Special Nuclear Material at Pantex, requiring the highest level of security,[3]
- Consolidation of tritium research and development at Savannah River Site (along with continued tritium production in commercial nuclear reactors belonging to the Tennessee Valley Authority),
- Maintenance of the Nevada Test Site in readiness to test nuclear weapons and larger scale high explosive testing (more than 10 kilograms of high explosives).[4]

Some other elements include research and development of high explosives at Lawrence Livermore National Laboratory and very small-scale (less than one kilogram) high explosives testing and other research at Sandia National Laboratory.

Comment 1: Costs range is not presented

7|9I

The Draft SPEIS claims that the changes that the complex would undergo could result in reduced costs.[5] However, NNSA's Complex Transformation plan would continue Cold War levels of spending on nuclear weapons work, more than $6 billion annually, for at least the next 25 years.[6]

[3] Draft SPEIS 2007, p. S-2.
[4] Draft SPEIS 2007, Section 3.17; Washington Savannah River Company, *SRS Tritium Facilities*, Facts About the Savannah River Site, Aiken, SC: SRS, January 2008, at http://www.srs.gov/general/news/factsheets/tf.pdf; *Nuclear Posture Review,* Submitted to Congress on 31 December 2001, Excerpts at http://www.globalsecurity.org/wmd/library/policy/dod/npr.htm.
[5] Draft SPEIS 2007, p. S-1
[6] Tom Clements, "DOE on that $150 billion for rebuilding the complex," e-mail on February 23, 2008, to the ANA Bananas listserv, quoting George C. Allen Jr., Director of the DOE's Office of Transformation.

This does not include long-term cleanup and decommissioning. Nor does it take into account the Department of Energy's (DOE) tendency to vastly underestimate costs of major projects. Table 1 shows cost escalations in some of DOE's large projects.

7|9I (cont.)

Table 1: Cost data in some major Department of Energy projects

Project	Early Estimate	Later Estimate
Superconducting Super-collider	$5.3 billion (1987)	$8.25 billion (1991)
National Ignition Facility	$2.03 billion (FY1998)	$3.26 billion (June 2000)
Savannah River Site Defense Waste Processing Facility	$1.2 billion (1987)	$3.9 billion (1992) ($2.1 billion plus $1.8 billion for supporting facilities)
Hanford Tank Waste Project (Phase I)	$4.3 billion (before September 1996)	$8.9 billion (August 1998)
All High-Level Waste Management Programs	$63 billion (1996)	$105 billion (2003)
Fernald Vitrification Project	$14.1 million (February 1994)	$20.6 million (December 1994) $56 million (July 1996) $66 million (September 1996)
Yucca Mountain	$17.5 billion (30 year cost estimated in 1990 adjusted to year 2000 dollars)	$58 billion (100 year cost estimated in 2000) DOE contractors said cost was understated by $3 billion since repository would not likely open in 2010 as claimed

Sources: GAO/RCED-93-87 p. 2, GAO/RCED-97-63 p. 5, GAO/T-RCED-99-21 p. 2-4, GAO-02-191 p. 19, GAO/T-RCED-93-58 p. 8, GAO-03-593 p. 17, GAO/RCED-92-183 p. 3, and Rowberg 2001[7] p. CRS-3 and CRS-5

Recommendation 1: *The Final SPEIS should provide a range of costs, with the upper end of the range based on an analysis of the cost overruns of major projects, such as the ones mentioned above, with all overruns to the present time included.*

Comment 2: There is no need for new pit production

5|5C1 (cont)

The NNSA claims that its needs to continue the production of plutonium pits to maintain a reliable stockpile because of plutonium aging. The need for continued production of plutonium pits is dubious. A recent study by the JASONs, an elite group of scientists who regularly provide analysis and advice to the government, including on nuclear weapons matters, concluded that the expected lifetime of existing plutonium pits was on the order of 100 years:

> Most primary types have credible minimum lifetimes 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 being implemented.

[7] Richard Rowberg, *The National Ignition Facility: Management, Technical, and Other Issues*, CRS report for Congress, Order code RL30540, Congressional Research Service, updated November 8, 2001

> The Laboratories have made significant progress over the past 3-5 years in understanding plutonium aging and pit lifetimes. Their work is based on analyses of archival underground nuclear-explosion testing (UGT) data, laboratory experiments, and computer simulations. As a result of the Los Alamos/Livermore efforts, JASON concludes that **there is no evidence from the UGT analyses for plutonium aging mechanisms affecting primary performance on timescales of a century or less in ways that would be detrimental to the enduring stockpile.**[8] [emphasis added]

5|5C1 (cont.)

There is no need therefore for enhanced pit production capability, or indeed any pit production capacity at all. This appears to be little more than a vast and continuing pork barrel program for the nuclear weapons establishment.

Any arguments related to safety and reliability would either be related to secondary components or to the non-nuclear components. New pit production capacity is not relevant to these concerns, should they be legitimate. Moreover, in the context of the disarmament requirements of the NPT, they are not legitimate.

Recommendation 2: *An alternative of no pit production should be included in the Final SPEIS. It is certainly one reasonable alternative, without which the SPEIS would be fundamentally incomplete.*

8|7O1

Comment 3. An option without Los Alamos needs to be considered

9|7E

The competition between Livermore and Los Alamos for the design of the nuclear components of the so-called "Reliable Replacement Warhead" was "won" by Livermore. Moreover, Los Alamos has had many security-related problems. In January 2007, the Director of NNSA was relieved of his responsibilities, at least partly due to LANL's repeated major security problems and scandals.[9]

10|14M; 11|7A7; 12|10B.1

One of the most important problems at LANL, but one that yet has not been fully investigated, has been its poor plutonium accounting as it relates to waste. There are two sets of books on plutonium accounts. One of these, the Nuclear Materials Management and Safeguards System (NMMSS), the master nuclear materials account, is at variance with the waste account, notably that compiled by LANL for the U.S. Environmental Protection Agency (EPA) as part of its program to send transuranic wastes to the Waste Isolation Pilot Plant (WIPP) for deep geologic disposal. A study by IEER has shown that the NMMSS account and WIPP account for plutonium in waste cannot both be right at the same time (though they may both be wrong).[10] The discrepancy amounts to about 300 kilograms. There are potentially serious environmental implications if the amount in waste is greater than now believed by 300 kilograms. There are potentially serious security implications if the NMMSS account is short by 300 kilograms.

[8] JASON Program Office, *Pit Lifetime*, R.J. Hemley, et al., JSR-06-335, MITRE, McLean, VA, January 11, 2007, p. 1. ("Approved for public release").
[9] "Statement from Linton Brooks," January 4, 2007, at http://www.nnsa.doe.gov/docs/newsreleases/2007/PR_2007-01-04_NA-07-01.pdf.
[10] The analysis of this assertion is to be found in IEER's report, *Dangerous Discrepancies*, at www.ieer.org/reports/lanl/weaponspurereport.pdf.

12|10B.1 (cont.)

Repeated attempts to get the DOE and the NNSA, as well as the EPA, to seriously investigate this problem, which amounts to 60 bombs worth of plutonium, have failed.[11] IEER has received assurances from NNSA that the NMMSS account is correct. We have also received assurances from the EPA that the WIPP account is correct. These statements cannot both be correct – it is arithmetically impossible.

9|7E (cont)

There have been other security-related scandals at Los Alamos, going back to the Manhattan Project, when the plutonium bomb design was stolen and given to the Soviets. More recently, in 2006, an employee was able to walk away with highly classified documents on a flash drive, which was found in a house-trailer.[12]

13|14E

Further, plutonium, strontium, and other radionuclides have found their way into groundwater near Los Alamos. Because of past dumping, storm water in the canyons as well as groundwater nearby is contaminated – in excess of drinking water standards in some cases (see Tables 2 and 3). While the water is not used for drinking, it does flow into the Rio Grande.

Table 2: Some storm water data for canyons near LANL in picocuries per liter

	Onsite canyons	Mortandad Canyon	Drinking water standard	Drinking water standard, if all 3 radionuclides are present equally
Americium-241	15	40	15	5
Plutonium-238	15	50	15	5
Plutonium-239/240	10	30	15	5

Values estimated from graphs in the 2006 Draft LANL SWEIS, Appendix F, Figures F-13, F15, and F-16; Standard from 40 CFR 141.66 2005.[13]

[11] Correspondence with the EPA, DOE, NNSA, can be found at www.ieer.org/latest/pudiscrepanciesindex.html.
[12] For a record of the many security-related infractions at Los Alamos, see the compilation by the Project on Government Oversight at http://www.pogo.org/p/homeland/ha-071212-lanl.html and the related document URLs at that location and at http://www.pogo.org/p/environment/eo-losalamos.html.
[13] U.S. Department of Energy, National Nuclear Security Administration. Los Alamos Site Office, *Draft Site-Wide Environmental Impact Statement for Continued Operation of Los Alamos National Laboratory, Los Alamos, New Mexico*, DOE/EIS-0380D, June 2006, at http://www.eh.doe.gov/nepa/docs/deis/eis0380d/index.html and *Code of Federal Regulations. Title 40--Protection of Environment. Chapter I—Environmental Protection Agency. Part 141--National Primary Drinking Water Regulations*, 7-1-05 Edition, at http://www.access.gpo.gov/nara/cfr/waisidx_05/40cfr141_05.html.

Table 3: Groundwater contamination near LANL, 2001-2004 in picocuries per liter

	Canyon alluvial groundwater systems	Other springs	San Ildefonso Pueblo	Drinking water standard
Americium-241	0.5	0.03	0.02	15
Plutonium-238	0.6	0.015	2.0	15
Plutonium-239/240	0.25	0.015	0.01	15
Strontium-90	20	50	0.2	8

11|7A7 (cont.)

13|14E (cont)

Values estimated from graphs in the 2006 Draft LANL SWEIS, Appendix F, Figures F-1, F-3, F-4, and F-5; Standard from 40 CFR 141.66 2005.[14]

Recommendation 3: *In light of the multiple problems at Los Alamos and the fact that Livermore was given the role of new pit design, one alternative without a Los Alamos in Complex Transformation, in which the existing pit production at Los Alamos is terminated, should be considered.*

Comment 4. Consequences of a resumption of nuclear testing have not been examined

4|1Q (cont)

One element of the NNSA plan is the Reliable Replacement Warhead (RRW) program, though the Draft SPEIS claims that it is not essential to the Complex Transformation it seeks.[15] The RRW program aims to create a new generation of nuclear weapons that are more reliable, easier to maintain, and more secure in the sense of preventing unauthorized use.[16] Even if the specific RRW under investigation is not manufactured, new pit manufacturing could create significant uncertainties.

14|8A

There is a reasonable likelihood that nuclear weapons that incorporate new pit designs will have to be tested before they can be certified as safe and reliable components of the U.S. nuclear arsenal. IEER recognizes that the goal of the Stockpile Stewardship Program has been to certify "the safety and reliability of nuclear weapons without underground testing."[17] However, the introduction of newly designed pits, rather than the use of existing pits that have already been certified after the testing of existing weapon types, clearly raises the possibility that one or more types of nuclear warheads incorporating these new pit designs will need to be tested before they can be certified for the U.S. nuclear arsenal.

The possibility of testing has arisen already within official circles in the form of a refusal to make commitments on testing:

[14] ibid.
[15] Draft SPEIS 2007, Section 2.5.8.
[16] For more information on RRW, see NNSA's March 2007 fact sheet, "Reliable Replacement Warhead Program," at www.nnsa.doe.gov/docs/factsheets/2007/NA-07-FS-02.pdf.
[17] Stockpile Stewardship Program, op.cit., at http://www.nv.doe.gov/library/FactSheets/DOENV_1017.pdf.

> On Friday, Bryan Wilkes, a spokesman for the National Nuclear Security Administration of the Energy Department, said the government would not proceed with the Reliable Replacement Warhead "if it is determined that testing is needed." But other officials in the administration, including Robert Joseph, the under secretary of state for arms control and international security, have said that the White House should make no commitment on testing.[18]

15|8E

Hence, even before a single spadeful of dirt has been turned to implement the new plan, government officials in positions of authority are not in accord. Moreover, once built, there is no guarantee that the specific uses to which the facilities will be put in 2030 or 2040 or 2050 are those that are envisioned today in terms of the types of pits that will be manufactured or the design goals that those weapons must meet. Meeting the requirements of the Department of Defense (DOD) and national security decision-makers is the stated goal of the Complex Transformation program. The Reliable Replacement Warhead program may be initiated with the intent that the warhead would not require testing, but that intent could fall by the wayside if, for instance, the directors of the national laboratories or DOD decision-makers decide after the initial pits are built that testing is needed for safety and/or reliability.

Testing is made even more likely by the recent poor record of the DOE in its performance on major technical projects, as discussed above. Design and manufacturing of a new pit that would be the key component of a warhead that could be certified without testing would be an enormous challenge under any circumstances. Under the management of the DOE as it has operated for the last two decades, the likelihood of testing and the environmental harm that it would cause is considerably greater. Management problems and unforeseen problems in design or new design requirements arising out of new functions of nuclear weapons in DOD's planning or any combination of these factors could lead to a lack of confidence in the reliability of new pits without testing. There is a reasonable likelihood that new pit designs will necessitate testing, especially given DOE's poor track record in major technical projects.

16|14K

17|11C

Testing is one reasonable and potential foreseeable consequence of embarking on new pit designs and should be evaluated. This evaluation should take into account the research that has been done at the Nevada Test Site (NTS) that indicates that plutonium in colloidal form may travel much faster than believed when testing was being carried out[19] as well as other research on potentially rapid plutonium migration. The examination of the impacts of testing at NTS must be done for the same reason that the impacts of accidents that can be reasonably regarded as possible, even though unlikely, is necessary as part of the NEPA process. In this case, the likelihood of testing is far greater than that of many accidents that DOE has postulated and examined in the EIS's that form the antecedents to the Draft SPEIS.

18|1E

If the United States resumes testing, it is likely to result in the same by one or more of the other nuclear weapon states, such as Russia or China, or India. Note that China has not ratified the CTBT and is unlikely to do so unless the United States does it first; India has not signed it. There is no assurance that foreign resumption of testing would be underground, or, if it is underground, that it would not vent large amounts of radioactivity. Hence, the possibility that

[18] William J. Broad, David E. Sanger, and Thom Shanker, "U.S. Selecting Hybrid Design for Warheads," *New York Times*, 7 January 2007.
[19] A. B. Kersting, D. W. Efurd, D. L. Finnegan, D. J. Rokop, D. K. Smith, and J. L. Thompson, "Migration of plutonium in groundwater at the Nevada Test Site," *Nature* 397 (1999) 56-59.

Makhijani, Arjun
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19|4A1 new pit designs would eventually lead to a complete breakdown of environmental norms cannot be ignored, even though this may now be regarded as unlikely. The direct and indirect environmental impacts on the United States of foreign resumption of testing should be examined as part of the overall potential impacts, in the same manner that accidents, even rather improbable ones, are considered.

Recommendation 4: *The environmental impacts of a resumption of nuclear weapons testing at the Nevada Test Site needs to evaluated as part of the evaluation of new pit and RRW production and certification. The resumption of testing in other countries, specifically including Russia, China, India, and Pakistan, needs to be evaluated in this context.*

Comment 5. Some risks to human health and environment have not been fully evaluated

DOE estimates that worker radiation exposure would result in about 0.1 cancer deaths per year.[20] Multiplying this value for annual expected deaths by the expected operation of 50 years, about five workers would be expected to die of cancer as a result of work-related radiation doses. The surrounding communities would also be at risk. For instance, some accidents, such as a fire or explosion in the feed casting furnace, could cause 11 to 20 cancer fatalities in the community around Los Alamos.[21] These are estimates straight out of the Draft SPEIS.

2014K14 Further, the dose estimates for "non-involved" workers in case of accidents appear far too low. The Draft SPEIS assumes that the worker will be as much as one kilometer away from the location of the fire or explosion, when there is a significant chance that, given the layout of Los Alamos facilities buildings and roads, many workers would be a lot closer. External doses vary approximately according to the inverse square of the distance. For instance, if non-involved workers were within 100 meters (about 110 yards) from the accident location, the estimated dose would be roughly 100 times higher than the DOE estimate. The Draft SPEIS also does not provide estimates of how many "involved" workers – those at the place where the accident is hypothesized to occur – would die of cancer or direct injuries as a result of such accidents.

Recommendation 5*: The Final SPEIS should provide an evaluation of the risks to "non-involved" workers that takes into account situations where such workers would be considerably closer to the accident location than 100 meters. If 100 meters is retained, a technical rationale as well as a specification of who is considered a non-involved worker should be provided.*

Comment 6. Evaluation of an additional alternative is needed

21|7N2 New nuclear weapons functions are not required and create needless risks to workers and the public and also will aggravate security problems in the sense that the United States will be setting a poor example by establishing new weapons design and new pit production capability. The preferred alternative in the Draft SPEIS is arguably the worst in many ways because it:

[20] DRAFT SPEIS 2007, Table 3.16-1.
[21] DRAFT SPEIS 2007, Table 5.1.12-1a.

Makhijani, Arjun
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22|9H
21|7N2 (cont)
9|7E (cont)
13|14E (cont)

- wastes huge amounts of taxpayer money by keeping nuclear weapons functions at Los Alamos, even though the new pit design function has been given to Livermore,
- centers plutonium pit production at Los Alamos, which has had serious plutonium accounting problems and many other security related problems and infractions – far more than Livermore – as well as problems with water contamination,
- increases the risk of more serious pollution of ground and surface waters in and around Los Alamos, especially in case of fires or serious accidents, even after past weapons work has already created significant pollution that remains to be remediated.

23|7A7 ***Recommendation 6:*** *Another alternative that is in line with health, environmental, and security concerns needs to be examined in the Final SPEIS. This alternative would be to end new nuclear weapons design, testing, and production functions altogether at both laboratories.*

Malecki, Jessie
Page 1 of 1

PC_530

Buenaflor, Justin

From: Jessie Malecki [jessiema.1@earthlink.net]
Sent: Friday, March 14, 2008 2:31 PM
To: Complex2030
Cc: Mike McNulty
Subject: Draft Complex Transformation SPEIS Comments

Good afternoon:

1|1K
2|16A
We certainly do NOT want more nuclear weapons.

This administration has done enough damage to USA so let us NOT add more to it by letting them add more nuclear weapons. I definitely prefer reducing nuclear arms, not developing new and better ones.

For diversity why doesn't this administration LISTEN TO THE AMERICAN PEOPLE!!!!!

(Mrs.) Jessie Malecki
21 North St.
Schenectady, NY 12305

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Malmgren, Peter
Page 1 of 1

PC_1501

Levens, Matthew

From: Peter Malmgren / Lucy Collier [lcpm@valornet.com]
Sent: Sunday, April 27, 2008 11:18 PM
To: Complex2030
Subject: pit production at Los Alamos

Dear Sir,

I regretted not being able to attend your recent meeting in Espanola, New Mexico. I thought I would take this opportunity to share some of my thoughts on the subject as a 38 year resident of the area. I recently wrote a letter to the editor of the Rio Grande Sun commending Mayor Maestas for his outspopken stance against increased pit production in Los Alamos. He is the first public official in living memory who has had the courage, the audacity, to openly criticize the Lab.

Many of the people in my community of Chimayo are deeply dependant on the Lab for their jobs. This is true all over the Rio Grande Valley. The Lab has been a boon to so many and a curse to many others. I spent five years producing an oral history study of the workers of Los Alamos over a fifty year period. Of the 150 people I interviewed in depth roughly 50% answered positively when I asked, "if you had it to do all over a gain, would you follow the same path that lead you to the Labs?" The other half were adamantly negative.
1|14K They had all suffered severe health effects from their exposures in the work place and would never again trade a decent paycheck for their health. They warn their kids away.

1|14K (cont) In 2000, Bill Richardson, then head of DOE enacted a compensation law that went on the books and promised relief to the hundreds, even thousands of "Cold Warriors" who had grown ill during their long years of service. The program became a cruel joke as the bureaucrats choked the life out of it and most of the funding was diverted to physician panels, NIOSH experts, etc. People literally were dying as the waiting and the frustration became more protracted. We started a group called the LA POW's (program on worker safety) in an attempt to raise our voices in protest for what had become an embarrassment to the politicians who initially promised so much.

I am acutely aware of the need for jobs to be available to my friends and neighbors in the valley, but we are all beginning to question the need for greater stockpiles of nuclear weapons. It's clear that a terrorist war has nothing to do with nuclear power. Scientists tell us that the existing pits have a much longer shelf life than previously assumed. It all adds up to another fiasco on a mass scale that wastes precious resources that should be put into legacy waste remediation. We've watched the Lab delay, manoeuvre, launch countless unneccessary studies, all in an attempt to avoid the inevitable. As we fiddle, Rome burns. The Rio Grande becomes the recipient of toxic waste, the deep wells show trace elements of dangerous substances...

2|3A In conclusion, it's time for the Lab to take a hard look at its mission and change with the times. We are wasting a precious resource when we ask our best and brightest to concentrate on weapons. These men and women are willing and able to re-direct their energies into energy research, medical research, and legacy clean up. Let's put them to work doing something constructive at long last. The country is in sad shape and we need a new Manhattan Project but it mustn't involve bombs.

Sincerely,

Peter M. Malmgren
Director
Los Alamos Oral History Project
P.O. Box 438
Chimayo, New Mexico 87522

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Maloney, Elizabeth

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PC_1791

Levens, Matthew

From: Liz Maloney [lzbthmlny@stny.rr.com]
Sent: Sunday, April 06, 2008 9:53 PM
To: Complex2030
Subject: nuclear weapons

Dear Mr. Wyka,

1|16A 2|3A I am writing to state that I am totally opposed to rebuilding our nuclear weapons complex. The plan to build new nuclear weapons, in my view, is dangerous, illegal and immoral. I cannot agree that we need more nuclear weapons when we already have enough to destroy our earth and all life many times over. It is time for us to focus on Peace brought about by understanding, education and a fair distribution of our resources to all of the peoples of the world. Doing this will take all of our energy vs. wasting our energy on a further arms race.
Thank you for your attention to this matter.

Sincerely yours,
Elizabeth Maloney
1561 Pennsylvania Ave.
Pine City, NY 14871

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Maloney, Erin

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PC_1578

Levens, Matthew

From: banninger@gmail.com
Sent: Saturday, April 05, 2008 5:50 AM
To: Complex2030
Subject: Complex Transformation SPEIS Comments

Mr. Theodore Wyka, U.S. DOE
DOE Office of Transformation, NA-10.1
1000 Independence Ave., SW
Washington, DC 20585

Dear Mr. Wyka, U.S. DOE,

1|16A Instead of recreating the capacity to produce new, unnecessary nuclear weapons, the DOE should focus on shrinking the still-oversized nuclear weapons complex and on maintaining the safety and security of our existing weapons arsenal as the size of our nuclear stockpile is reduced.

Please do what is right -- not just what is politically expedient.

Sincerely,
Erin Maloney
915 So. Douglas
Nashville, TN 37204

cc:
Representative Jim Cooper
Senator Lamar Alexander
Senator Bob Corker

1

Maloney, Kathleen

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PC_2102

Levens, Matthew

From: Scott and Kathleen [hera@mtasiland.net]
Sent: Thursday, April 24, 2008 11:40 AM
To: Complex2030
Subject: nuclear weapons

1|16A:
2|8B I am very much against an increase in nuclear weapons, including RRWs.

Kathleen Maloney
535 Sutton Pl.
Ashland, OR 97520

Manion, Patricia

Page 1 of 1

PC_2085

Levens, Matthew

From: pjsl@juno.com
Sent: Thursday, April 10, 2008 11:55 AM
To: Complex2030
Subject: Complex Transformation Comments

I am one of hundreds of New Mexicans that find it outrageous that there has not been a greater effort and opportunity for the public to realize what is being proposed for their state. The effort alone to encourage the deadly process of disposing of water to force out uranium around the state needs to have more local meetings for those affective.

1|2E1 PLEASE have the courtesy to extend the period for responses from those who have little or no knowledge of what will happen to their environment and particularly the water. Proposing to truck in water does not solve New Mexico's water shortage while water from anywhere is being forced deep into uranium deposits that should stay where they are. There is not even a good rational for making any more nuclear weapons unless you are part of those who expect to destroy other parts of the planet so we can live in polluted air and die of cancer. A desperate citizen who loves New Mexico and our World.

Patricia J Manion
Santa Fe

1

Manion, Patricia

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PC_1506

Levens, Matthew

From: pjsl@juno.com
Sent: Tuesday, April 29, 2008 11:19 AM
To: Complex2030

STOP moving ahead on the Complex Transformation.

1|16A Apparently this is being rushed through so that the next administration and the to be elected members of Congress will have their hands tied. What kind of democracy are we practicing here? The nation and New Mexico do not favor this move. Please put a check on it now!!

Patricia Manion
A longtime citizen of New Mexico
and an opposer of any measure that
continues this country in an aggressive
posture toward eventual war.

1

Mann, Hugh

Page 1 of 1

PC_1370

Levens, Matthew

From: Hugh Mann [hughmann@organicMD.org]
Sent: Monday, April 21, 2008 12:51 PM
To: Complex2030
Subject: Peace Poetry

In the spirit of religious tolerance and interfaith dialogue, I offer the following poem:

BROTHER

I'm not well
If you are sick

1|20 I'm not rich
If you are poor

I can't live
If you're not free

I depend on you
And you can depend on me

A brother is no bother
We all have the same Father

Best regards,
Hugh Mann, The Patient Doctor
hughmann@organicMD.org
http://organicMD.org
http://organicmd.org/poetry.html#BROTHER
http://organicmd.org/reviewsofbrother.html

Manning, Marylynn

Page 1 of 1

March 2008

PC_205

Campaign for a Nuclear Weapons-Free World

Achieving a nuclear weapons-free world is my highest priority relative to the participation of the United States as a nation among nations of Planet Earth. I have grieved over the U.S. production of the atomic bomb, much less dropping it, not once but twice, on Japanese cities. (If you make it, you'll use it.) For the U.S. to continue to make (and use) "better, smarter" nuclear weapons puts them (us) in a hypocritical, non-caring flaunting of the 1968 Nuclear Non-proliferation Treaty. In Article VI of the treaty, all signatories are pledged to pursue "a Treaty on general and complete disarmament under strict and effective international control."

The 2007 World opinion poll indicates that 73% of Americans support the goal of a nuclear weapons-free world! The U.S. can lead the world in reducing the nuclear threat and earn the world's respect and good will as a result. The U.S. can lead by example, renounce the development of new nuclear weapons and ratify the Comprehensive Test Ban Treaty.

1|3.0; 2|1B; 3|1F; 4|1J

5|16A I am unequivocally against Complex Transformation.

Sincerely,
Marylynn Manning

Marylynn Manning
PO Box 1405
Clarendon, TX 79226-1405

Mannix, Carla

Page 1 of 1

PC_1297

Levens, Matthew

From: Carla Mannix [hfhmannix@yahoo.com]
Sent: Friday, April 25, 2008 12:00 AM
To: Complex2030
Subject: spend less on weapons, more on energy

Carla Mannix
2036 Cleveland Ave
Reading, PA 19609-2004

April 25, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A Even our Republican Congressional Rep (PA-6) rebuffed the Energy Department's last attempts to upgrade the arsenal by defunding the Reliable Replacement Warhead and last year's proposed mega-scale bomb plant. The Chemistry and Metallurgy Research Replacement (CMRR) project is another irresponsible new program that should be rejected.

My husband and I understand the Dept argues that this is an attempt to upgrade or make more efficient weapons so that we can ultimately hold less of them. We are against any use of the Dept of Energy to support any programs that ultimately lead to the death of children. The only real sane answer is to dismantle our nuclear arsenal.

2|1J As former Peace Corps volunteers, we know that the hypocrisy of the US is evident in other countries.

A solution can be found only if you give your experts, analysts, engineers, and scientists the task of figuring out how to dismantle them.

3|16A Let's spend less of your resources on these backdoor plans to jumpstart nuclear programs, and spend more time on renewables and peace-building programs.

Sincerely,

Carla Mannix
610-670-8497

1

Mansfield, Charles
Page 1 of 3

PC_838

Levens, Matthew

From: Charles R Mansfield [coyote2@swcp.com]
Sent: Monday, April 07, 2008 9:15 AM
To: Complex2030
Cc: Anastasio, Michael; Mara, Glenn L.; Martz, Joe; Wallace, Terry; Scarpino, Joe
Subject: LANL Retiree Contribution to the Complex Transformation Issue

Attachments: TRANSFOR.pdf

TRANSFOR.pdf (51 KB)

Ted,

Please find attached a PDF file that contains some considerations that need to be addressed in the Complex Transformation Process. Thank you for your efforts in presenting the NNSA/LANL story in the chosen venues.

Charles (Chuck) R. Mansfield, Ph.D.

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Mansfield, Charles
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PC_838

498 Quartz St.
Los Alamos, NM 87544
7 April, 2008

Mr. Ted Wyka
Office of Transformation NA-10.1
1000 Independence Ave, S.W.
Washington D.C. 20585

Subject: Written comment on the Transformation of the Weapons complex

Sir,

1|10B I attended the presentation and comments on made at Los Alamos, NM on 12 March, 2008. In addition, I have attended presentations made to the Community Leaders Breakfast and the tour of the LANL weapons facility that was graciously presented by the staff of Los Alamos National Laboratory. I am the President of the Laboratory Retiree Group, Inc. whose board of Directors has given me permission to write this letter as a corporate officer.

2|15A I approve of the general outline of the transformation of the Weapons complex but do have some reservations on the details of the final outcome. I was heavily involved in the Coalition for LANL Excellence (CLE) during the development of the new contract for operation of the Los Alamos National Laboratory. My concerns were centered on the preservation of the Excellence in Science and Engineering that the Laboratory has maintained for over 60 years. I noticed that you emphasized excellence in your presentation. A study was done by a member of the Executive Committee of the CLE in attempt to determine what we and others meant by "Excellence". A measure of excellence can be achieved by determining the number of technical articles published in refereed Journals and by the Citation Index. The latter indicates the number of times that specific publications were referenced by other Authors. The top single institution in the world was the University of Tokyo. LANL and LLNL were in 6th or 7th position. The rest of the top institutions were the Campuses of the University of California. When summed over all of the UC campuses the UC surpassed the University of Tokyo by a factor of about 5. Since over half of the research and development done at LLNL and LANL is classified, reports of that work do not appear in refereed journals; however, the work at LANL and LLNL probably approaches the University of Tokyo for excellence by this standard.

1|10B (cont.) The issue that I raise is: how can the excellence of laboratories such as LANL and LLNL be maintained in the future? Much of the work that has been done at the National Laboratories has historically been driven by the needs of the Weapons complex. These needs have inadvertently spun off whole new technologies that were only loosely related to the perceived national need in the weapons arena. Because these needs were so important, cost was not a major issue. The PBS television series "Connections" by James Burke illustrates the process that leads to advancement of science and technology. The real advances in science and technology are usually precipitated by small advances in seemingly unrelated areas. In the past it was possible to use weapons funds to explore those loosely related areas. If the results of the preliminary research were promising then it was possible to obtain other funding to further develop the ideas.

Mansfield, Charles
Page 3 of 3

PC_838

3|9B Over the years the amount of discretionary funds for exploration that were available to the Directors of the Laboratories has steadily decreased. I realize that making arguments to maintain levels of funding for fundamental research to Congress and the national leaders of the Administrative branch is becoming increasingly difficult. This is the reason that I have deep concerns. We must maintain the levels of fundamental research and development for this nation to maintain its position in the world. You mentioned that it is necessary that the DOE obtain the best and brightest of our national scientists and engineers to staff the National Laboratories. The best and brightest people will seek out positions where they have the ability explore new ideas.

4|20 There are innumerable examples where the ability to explore new ideas by LANL and LLNL staff has lead to national leadership in science and engineering. One of these began with the realization that droplets of liquids obtained an electrical charge when they are forced from a small opening. A worker at LANL realized that if an ion of some material was in a drop then by using a laser it would be able to detect the ion and since the drop contained an electrical charge the droplet could be directed into a collection tube. Since elimination of some impurities at a very low level was needed by the weapons complex, the worker was allowed to proceed to demonstrate the idea. When success was achieved, the worker was demonstrated the process to a colleague who asked if the process worked with organic molecules rather than ions. It turned out that it was possible. Thus the Coulter counter was born which led to the Human Genome project. Further advances in the technology have led to the possibility of looking at DNA in fields as disparate as Medicine and Forensics.

Maintaining our support for LANL staff to explore new concepts is necessary for our nation.

Sincerely yours,

Charles R. Mansfield, Ph.D., LANL (ret)
President, Laboratory Retiree Group, Inc.

---

cc:
Anastasio, Mike
Mara, Glenn L.
Wallace, Terry
Martz, Joe
Scarpino, Joe
LRG Board
LRG membership

Marcella, Madsen
Page 1 of 1

PC_2044

Buenaflor, Delight

From: Madsen, Marcella M [mmmadse@sandia.gov]
Sent: Wednesday, April 16, 2008 11:56 AM
To: DIV.Complex.Transformation
Subject: Form posted from Microsoft Internet Explorer.

Last Name=madsen
First Name=marcella
Email Address=mmmadse@sandia.gov
Street Address=512 turner drive NE
City=Albuquerque
State=NM
ZIP Code=87123
1|8E Comments=I suggest that it be determined if an RRW-type weapon is to be developed before the complex is transformed. Complex requirements could be very different depending on the RRW decision.

1

Marchand, Marie

Page 1 of 1

PC_1832

Levens, Matthew

From: Peace & Justice Center [whatcompjc@fidalgo.net]
Sent: Friday, April 04, 2008 2:01 PM
To: Complex2030
Subject: Statement of Opposition to Complex Transformation SPEIS

Importance: High

April 4, 2008

Dear Mr. Wyka and Others Involved,

Today is the 40th Anniversary of the assassination of Dr. Martin Luther King, Jr. This wise, prophetic leader, whose spirit still leads peacemakers such as myself today, said, "In a day when …guided ballistic missiles are carving highways of death through the stratosphere, nobody can win a war.
Today the choice is no longer between violence and nonviolence. It is either nonviolence or nonexistence."

1|16A From a grounding in King's moral vision, I oppose the Draft Complex Transformation SPEIS and the development of new nuclear weapons and a renewed weapons testing program that could likely be a natural progression of this development. In my opposition, I represent 1,500 supporters of our non-profit organization who oppose this project primarily for two reasons:

2|1J 1) US weapons proliferation has resulted in a surge of the presence of WMD in the world, thus making our nation and the world less safe. I call on the US government to take bold leadership in pursuing full disarmament of its arsenal, thereby being the exemplar for the world.

3|14H 2) The land belongs to the Western Shoshone Nation. American Indians have been a conquered people for centuries, their children taken from them and their land laid waste. Rather than worsening our oppression of this vulnerable population, I ask the US government to shut down and clean up the Nevada Desert Test Site.

This newest proposal by the United States' government puts it once again in direct violation of a recently confirmed decision by the United Nations Committee on the Elimination of Racial Discrimination (CERD). The CERD Committee urged the United States to "freeze," "desist," and "stop" actions being taken, or threatened to be taken, against the Western Shoshone Peoples.

Furthermore, the Union of Concerned Scientist has stated, "A thorough re-evaluation would conclude that it is in the interest of the United States to pursue a world free of nuclear weapons. The United States should NOT pursue new nuclear weapons."

1|16A (cont.) There is no doubt that Dr. Martin Luther King, Jr. would be imploring my same request were he alive today. Please honor his legacy by challenging yourselves and this government to lay down its weapons and hold out a hand to humanity, thereby helping to create the just and loving world for which King gave his life. Through the atom, you have harnessed an awesome power, and with it the power to destroy the earth. Will you heed Dr. King's cautionary cry? Will you choose nonviolence or nonexistence? It is up to you.

I would like a personal response from you that addresses my specific concerns. Please respond promptly. Thank you.

Sincerely,

Marie Marchand, Executive Director
Whatcom Peace & Justice Center
100 E. Maple Street/PO Box 2444
Bellingham, WA 98227
(360) 734-0217
www.whatcompjc.org

Marek, Becky

Page 1 of 1

PC_1283

Levens, Matthew

From: Becky Marek [bmarek@austin.rr.com]
Sent: Wednesday, February 20, 2008 5:48 PM
To: Complex2030
Subject: Nuclear Weapons

Becky Marek
8413 Selway Dr
Austin, TX 78736-3051

February 20, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A 2|5C I strongly oppose the administration's proposal to build a plant to produce plutonium pits for nuclear weapons.

1|16A (cont) There are too many problems in this country now for us to worry about the nuclear weapons.

Sincerely,

Becky Marek
512-301-8697

Markle, Judy
Page 1 of 2

862 Westchester Road
Grosse Pointe Park, MI 48230
April 10, 2008

PC_945

Mr. Theodore Wyka
Complex Transformation SPEIS Document Mgr.
U. S. Department of Energy
1000 Independence Ave., S. W.
Washington, DC 20585

Dear Mr. Wyka,

On February 26, 2008 I experienced a 1st time event in my life of 65 years — speaking out at a public hearing. This "speak out" occurred in the town of Oak Ridge in the beautiful state of Tennessee (see enclosed photos from when we first met). Previously, submitting a written question at our school board hearing was the closest I'd come to speaking out. Since then, I have frequently thought about and talked about the four NNSA alternatives presented as well as the alternative the Oak Ridge Environmental Alliance (OREPA) presented that day - a "No Production Alternative." I agree with OREPA and the 9 year old girl who spoke that day. OREPA's alternative is the only choice if that girl has aspirations that I had at her age!!! I agree so strongly that I am now engaging in another first for me — writing a letter to a public official. The following is my testimony from February 26, 2008 plus some additional thoughts since then. 1|7O

Before making my 1st annual pilgrimage to Oak Ridge five years ago, I told a friend of my plans. This friend, Barbara, is also a mother as well as a physician. Before I could say TN, she interrupted me to say "I know about Oak Ridge. When my son was a student at the University of Michigan, his rowing team chose Oak Ridge as their week long practice site because it was the closest site available (even though it is almost a 10 hour drive). However, before leaving Oak Ridge that year, the team make another decision – Never again practice rowing in that beautiful city! While these college students acknowledged that this area of the U.S. is beautiful, the water they practiced in (to use their term) was "gross"!!! Upon returning to the metro Detroit area from my first Hiroshima Day Action there, I immediately called Barbara to advise her of the signs now on the small streams leaving the Y-12 plant, "No swimming or drinking this water." Barbara and I assumed that this pollution AND health danger had at least been contained so that our adult children would no longer be exposed! 2|14O; 3|14E

The Sunday before leaving for the 2 / 26 / 08 DOE public hearing I had a similar experience at church. Another mother, Phyllis, overheard me telling someone about my trip. This fellow parishoner then told me that her daughter now is a TN college student on a rowing team that regularly practices in Oak Ridge for a week at a time. Phyllis' concern is a about the long term health dangers her daughter may experience because of this frequent pollution exposure.

Markle, Judy
Page 2 of 2

While there are many scientific, political and moral reasons for choosing the OREPA alternative over the four NNSA alternatives, this pollution concern should not be ignored AND glossed over by just putting up signs at the steams leaving the Y-12 plant. One of the last speakers at the evening session on 2 / 26 / 08 ALSO addressed health concerns. As a retiree of the Y-12 plant, he spoke about the large number of former Y-12 employees now receiving disability due to exposures while employed at Y-12. While the overriding concern of the majority of speakers at the Y-12 hearing was about maintaining their Y-12 jobs, I have come to agree with Sharon O'hare-Bruce, a lawyer from Michigan who also spoke that day. She maintains that the employees at Y-12 and the country and the world would be better off IF our government continued paying their current salaries for NOT working at the Y-12 plant. While I admit that I first thought this idea was "bizarre", I've come to realize there is a lot of truth in this statement even if it has less of a chance of passing than the OREPA alternative and doesn't address the possible health consequences of letting nuclear sites remain in their current state. The OREPA approach remains my number 1 alternative. In addition to bringing the U.S. in compliance with the Non Proliferation Treaty finally, it includes many years of continued employment for Y-12 and other nuclear site employees to dismantle the existing stockpile, decontaminate and clean up our current nuclear sites. 2|14O (cont.); 4|14K

Thanks for this opportunity to speak up in person and in writing AND for your sincere efforts AND attention to the comments from ordinary citizens AS WELL AS all the follow up activities in this process. 5|1F

Sincerely,

Judy I. Markle

Judy I. Markle, BSW

jm
cc: Barbara, Phyllis, Sharon O'Hare-Bruce, and
Michigan Stop the Bombs Campaign (MICTBC)

Markowitz, Leonard

Page 1 of 1

1|16A

PC_67

2/12/08

MY DEAR OAK RIDGE ENVIRONMENTAL PEACE ALLIANCE
WHAT YOU SENT ME IS TRULY HORRIBLE HORRIBLE BUT
TRUTHFUL IN THE FIRST DEGREE TO SAY THE LEAST AND ALL
THE MORE SO FROM THE MOMENT OF CONCEPTION TO
PREGNANCY TO FINALLY BIRTH WITH ALREADY ONE FOOT IN
THE GRAVE FROM PAST THOUSANDS OF HUMAN GROWTH ON
PLANET EARTH FROM CARBON MONOXIDE POLLUTION
ROTTEN ANIMAL FOOD COOKED FOOD SPICES SWEETS AND
DRUGS AND MEDICINES INSTEAD OF FOLLOWIN A HEALTHFUL
BREATHARIAN LIQUIDARIAN FRUCTARIAN AND EASILY
DIGESTIBLE LEAFY VEGETABLES IN COMFTOR CLIMATE
AND PEACEFUL LIVING INSTEAD OF POLLUTED CITIES
SMOKESTACKS CHIMNEYS WARS OF DESTRUCTION
SCHOOLS HOSPITALS CHURCHES CARS TRUCKS BUSES
AIRPLANES TRAINS ETC ETC ETC DOCTORS DENTISTS
ETC. BEING HEALTHY IS A UPHILL CLIMB FOR
HEALTH INSTEAD OF WARS OF DESTRUCTION
DESTRUCTION DESTRUCTION AMEN

1|16A
(cont)

Leonard Markowitz
3760 Rathbone Ave
Bronx NY 10463
1-718 543-8982

Marshall, Laura

Page 1 of 1

PC_2034

Levens, Matthew

From: Laura Marshall [lauraj@mind.net]
Sent: Thursday, April 24, 2008 10:30 PM
To: Complex2030

1|16A

No more nuclear weapons! Laura marshall

Marshall, Suzanne
Page 1 of 1

PC_347

March 17, 2008

Dear Mr. Wyka,

1|16A — I write to fully oppose any new construction or operation of any nuclear weapons production facility. Specifically, I oppose a new nuclear weapons production facility near Oak Ridge, Tennessee.

2|14O — Besides the critical health & environmental problems of nuclear weapons, this new plant would be a violation of the Nuclear Nonproliferation Treaty.

3|1F — Look toward real security & keep our promise that we signed the Nonproliferation Treaty.

Sincerely,
Suzanne Marshall, PHD
365 Meadow Dr.
Ashland, OR 97520

I grew up in and love Tennessee & have a brother & niece & nephews living near Oak Ridge. Don't jeopardize their futures!

Martin, Dorothy
Page 1 of 1

PC_312

NA-10

Administrator Thomas P. D'Agostino
National Nuclear Security Administration
Department of Energy
Washington, DC 20585
March 19, 2008

Subject: Revise the Complex Transformation SPEIS

Dear Administrator D'Agostino,

1|16A; 2|2A; 3|5A — I strongly object to the current draft Complex Transformation Supplemental Programmatic Environmental Impact Statement. The NSSA appears to have ignored thousands of public comments submitted during the scoping process that requested the agency to analyze the full range of reasonable alternatives for consolidating the nuclear weapons complex between now and 2030, including an alternative that would both support and reflect implementation of the U.S. obligation under the Nonproliferation Treaty to negotiate the progressive reduction and eventual elimination of its nuclear arsenal, in concert with the other nuclear powers.

4|1C — The current draft analysis is guided by a widely discredited "Nuclear Posture Review Report" that former Secretary of Defense Rumsfeld submitted to Congress in December 2001. Even at the time this now obsolete report was limited, in Sec. Rumsfeld's words, to "laying out the direction for American nuclear forces over the next five to ten years." It therefore cannot possibly serve as the basis for the present analysis, which will be in effect through 2030. This shortcoming is even more glaring in light of the pending nuclear weapons and nonproliferation policy reviews Congress mandated when it authorized national defense funding for fiscal year 2008.

3|5A (cont.) — The draft plan arbitrarily excludes review of consolidation options that would eliminate weapons complex sites that are no longer necessary, leaving a proposed complex for 2020 and beyond that looks remarkably like the complex of 1995. Maintaining two competing nuclear weapons design laboratories and an active test site almost 20 years after the end of the Cold War sends exactly the wrong message to the world. Under an alternative that presumes good faith compliance with the Nuclear Nonproliferation and Comprehensive Test Ban treaties, the NNSA must examine closing its nuclear weapons test site in Nevada while consolidating nuclear design functions at Los Alamos National Laboratory and non-nuclear component production at Sandia National Laboratory, both in New Mexico. This alternative alone would reduce the nuclear weapons complex from eight sites in seven states to five sites in four states and save on the order of a billion dollars annually.

5|2B — In sum, the draft SPEIS is unacceptable in its current form. I urge your agency to radically revise the draft to fully rectify the problems noted above, and then re-issue the revised draft for public comment. How can we expect recognition in the world as opposing nuclear proliferation when we are continuing our present programs!

Sincerely,

Dorothy M. Martin, 7184 Grey Squirrel Bl, Sarasota, FL 34231

Martin, Elizabeth
Page 1 of 1

April 17, 2008 PC_929

Theodore A. Wyka
Complex Transformation, SPEIS Document Manager
Office of Transformation, NA-10.1, U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Wyka,

1|16A 2|14O Our planet might survive if we negotiate to eliminate nuclear weapons worldwide. Spending $30-50 billion on a new generation of nuclear weapons will move the atomic clock closer to midnight and planet self-destruction. How does that benefit American interests?

3|1J A U.S.-led nuclear weapons upgrade program will start a new Cold War style arms race. How does that benefit American interests?

4|13A If terrorists set off a nuclear bomb, where does the US retaliate? How does a new generation of nuclear weapons benefit American interests in this case?

If operator-error sends a live nuclear missile to North Korea or China, how does a new generation of nuclear weapons benefit American interests?

Instead of America spending $30-50 billion on a new generation of nuclear weapons, I would rather that America spend the money on the following:

5|9B
- Educate our brightest young people in diplomatic skills and teach foreign languages like Arabic, Farsi, Korean and Chinese from an early age.
- Train our brightest young people in cross-cultural negotiation skills, like Bill Richardson did. He effectively negotiated with North Korea in the 1990's.
- Provide fully paid scholarships to our best and brightest students who specialize in international peace process.
- Create think tanks, provide grants, and sponsor international exchanges of eminent scientists, trade specialists, financiers, educators, theologians and the like to find ways to solve the problems that lead to conflict.

I'm 62 years old, a retired water treatment professional and I have two beautiful nephews whose future I would like to assure. They are depending on us, their elders, to do the right thing. Let's not fail them. I would appreciate hearing your thoughts on my comments.

Sincerely,

Elizabeth M. Martin
3328 Bahia Blanca East, #A, Laguna Woods, CA 92637
Bmartin125@comline.com

Martin, Elizabeth
Page 1 of 1

PC_1972

Levens, Matthew

From: Elizabeth Martin [bmartin125@comline.com]
Sent: Friday, April 18, 2008 1:12 AM
To: Complex2030
Subject: OPPOSE COMPLEX TRANSFORMATION

Elizabeth Martin
3328 Bahia Blanca East, #A
Laguna Woods, CA 92637-2595

April 18, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A Reject the CMRR project! It is an irresponsible new Federal program that will not protect America. I vehemently oppose creating a new generation of nuclear weapons.

2|9A We do not need to spend $30-50 billion on a nuclear arms race. Spend the money on building peace.

1|16A (cont) I am a 62 year-old retired teacher and wastewater treatment professional woman. I want to leave my two beautiful nephews a safer world without the addition of plutonium pits and a new nuclear arsenal.

Sincerely,

Elizabeth Martin

1

Martin, Patsy
Page 1 of 1

PC_1493

Levens, Matthew

From: Patsy Martin [patsy@pcdl-usa.com]
Sent: Tuesday, February 19, 2008 4:03 PM
To: Complex2030
Subject: Nuclear Weapons

Patsy Martin
478 N. 8th Avenue
Upland, CA 91786-5409

February 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

Patsy Martin
478 N. 8th Avenue
Upland, CA 91786

1|15A I support the administrations proposal to build a plant to produce plutonium pits for nuclear weapons.

I understand the need to us to have this in order to protect ourselves, and keep up with the other nations.

Vote yes for strong nuclear weaponry.

Thank you!

Sincerely,

Patsy Martin
909 625-8787

1

Martinez, Johnnie
Page 1 of 1

Complex transformation statement
Johnnie Martinez
March 12, 2008

PC_1035

Norris Bradbury, the second director of what was then known as the Los Alamos Scientific Laboratory, once said "the whole object of making the weapons is not to kill people but to find time for somebody to find other ways to solve these problems."

That statement was made many years ago when the planet was embroiled in what came to be known as the "cold war," and nuclear weapons designed at Los Alamos did indeed force the powers involved to resolve their deep-seated differences by other means. I believe that proof of this can be found in the deadly, but nonetheless limited-scale, non-nuclear military conflicts that have occurred since 1945—the year that two nuclear weapons showed the world the horrible consequences of their deployment.

Today, nuclear weapons designed and maintained by the Los Alamos National Laboratory continue to provide the time we still seem to need to solve our differences by other means.

1|15A

As a Laboratory employee for 33 years, I've become confident . . . and I remain confident, that the people and resources of this great laboratory can meet our nation's security needs safely, securely, and conscientiously. I firmly believe that the new responsibilities proposed for the Laboratory by the National Nuclear Security Administration will enable the Laboratory to build upon its science and technology strengths to further increase its effectiveness in support of this critical security mission. For 65 years, we've repeatedly renewed ourselves to meet changing national security needs, and we can do so again.

As a father and grandfather, I also remain hopeful that the terrible protection afforded by nuclear weapons will continue to force us, and the policy makers who represent us, to find other ways to solve these problems.

Los Alamos, NM

Martinez, Johnnie
Page 1 of 1

Complex transformation statement
Johnnie Martinez
March 27, 2008

PC_1063

Good evening.

My name is Johnnie Martinez, and I'm here this evening to speak in support of the role envisioned for the Laboratory by the DOE/National Nuclear Security Administration.

Norris Bradbury, the second director of what was then known as the Los Alamos Scientific Laboratory, once said "the whole object of making the weapons is not to kill people but to find time for somebody to find other ways to solve these problems."

1|15A That statement was made many years ago when the planet was embroiled in what came to be known as the "cold war," and nuclear weapons designed at Los Alamos did indeed force the powers involved to resolve their deep-seated differences by other means. I believe that proof of this can be found in the costly, but nonetheless limited-scale, non-nuclear military conflicts that have occurred since 1945—the year that two nuclear weapons showed the world the terrible consequences of their deployment.

Today, nuclear weapons designed and maintained by the Los Alamos National Laboratory continue to provide the time we still seem to need to solve our differences by other means.

As a Laboratory employee for 33 years, I've become confident . . . and I remain confident, that the people and resources of this laboratory can meet our nation's security needs safely, securely, and conscientiously. I firmly believe that the new responsibilities proposed for the Laboratory by the National Nuclear Security Administration will enable the LANL to build upon its science and technology strengths to further increase its effectiveness in support of this critical security mission. For 65 years, we've repeatedly renewed and redirected our resources to meet changing national security needs, and we can do so again.

As a father and grandfather, I also remain hopeful that the protection afforded by nuclear weapons will continue to force us, and the policy makers who represent us, to find other ways to solve these problems.

Albuquerque, NM

Martinez, Sofia
Page 1 of 1

Concerned Citizens of Wagon Mound and Mora County
P.O. Box 318
Wagon Mound, New Mexico 87552
(505) 573-1904

PC_951

Theodore Wyka
Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1
U.S. Department of Energy/NNSA
1000 Independence Ave., SW
Washington DC 20585
Re: Draft Conplex Transformation SPEIS Comments

April 10, 2008

Dear Mr. WyKa:

1|16A
2|14O Our organization opposes the DOE's Complex Transformation Proposal because it is unnecessary. The world and our country do not need any more nuclear arms rather we need less; especially in New Mexico, which is already a national sacrifice state. Our environment and communities bear the historical legacy of the nuclear cycle from its mining on indigenous communities to its research and testing from which we have and continue to pay the price with our health and the polluting of our water, air and earth.

3|2E
4|1J We demand that the public comment period be extended so that communities can have adequate time to study and question this proposal. We should be leaders of peace in the world not the ones leading the way in developing and producing weapons of mass destruction.

Please put us on your database and information lists with regard to DOE proposals for New Mexico. We await your response.

Sincerely,

Sofia Martinez, Chair
CCWMMC

Marumoto, Margaret
Page 1 of 1

PC_62

Ms. Margaret Marumoto
195 Blossom Hill Rd Lot 226
San Jose, CA 95123

February 14, 2008

Mr. Theodore Wyka, Complex Transformation SPEIS Document Manager
Office of Transformation, NA-10.1, U.S. Dept. of Energy/NNSA
1000 Independence Avenue SW
Washington, D.C. 20585

Dear Mr. Wyka:

I suggest the following two projects be added to those already in planning:

1|7A 1) We will need permanent accommodations and relocation resources for Earth's population on the moon, and

2|20.0 2) We will need several hundred thousand space vehicles
(a) spaced according to population density on Earth's land masses
(b) ready to take on passengers for launch to the moon on short notice when the final war of annihilation begins.

MJ Marumoto
MJ Marumoto
Earth resident
Confirmation of receipt is requested.

Marvinny, Suzanne
Page 1 of 1

PC_279

March 27, 2008

United States DOE
Theodore Wyka, NA-101

Dear Mr. Wyka,

1|16A I oppose building of any new nuclear weapons facility for bombs anywhere.

2|1F 3|1J We must abide by the Nuclear Weapons Non-Proliferation Treaty.

Sincerely,
Suzanne Marvinny
369 Meadow Dr.
Ashland, OR 97520

Massengale, Kathy
Page 1 of 1

PC_526

Buenaflor, Delight

From: Kathy Massengale [kmasseng@unm.edu]
Sent: Thursday, March 06, 2008 7:32 PM
To: DIV.Complex.Transformation
Subject: Form posted from Microsoft Internet Explorer.

Last Name=Massengale
First Name=Kate
Email Address=kmasseng@unm.edu
Street Address=1157 San Ildefonso Road
City=Los Alamos
State=NM
ZIP Code=87544
Comments=I want to state that I believe in the mission(s) of LANL; that the lab contributes to the well-being of the community economically, and as a good citizen, through scholarship programs, community and state-based contracts with small businesses and subcontractors.

In addition, the lab has the intention of doing a better job of being environmentally responsible, and I hope it honors that intention better than it has in the past.

I support the transformation plans for a smaller footprint, better quality facilities, and higher-tech capability-based strategic planning.

I desire to live in a world that does not need nuclear arms. The reality of our world is not there, yet. We need the deterrence that the work of the lab supports. And we need to be able to respond to potential nuclear terrorists and to use the knowledge and technology of the lab to work on non-proliferation.
For those reasons, I support LANL.

1|7J;
2|15A

1

Mast, Peggy
Page 1 of 1

PC_1186

Levens, Matthew

From: Peggy Mast [pmast@ink.org]
Sent: Monday, March 31, 2008 12:32 PM
To: Complex2030
Subject: Please encourage more nuclear power facilities.

Peggy Mast
765 Road 110
Emporia, Kansas 66801, KS 66801-7559

March 31, 2008

Complex Transformation

Dear Complex Transformation:

1|20
2|1N I appreciate the opportunity to speak on behalf of nuclear power. This is the most efficient and cleanest form of energy available. It is also the cheapest form of energy after the plant has been built. Please do all you can to encourage more nuclear energy.

Thank you,

Sincerely,

Peggy Mast
620-343-2465

1

Mather, Carolyn
Page 1 of 1

PC_1300

Levens, Matthew

From: Carolyn Mather [lynnmather@verizon.net]
Sent: Tuesday, February 19, 2008 5:24 PM
To: Complex2030
Subject: Oppose Bush Proposal for Nuclear Weapons

Carolyn Mather
7425 Boyer St
Philadelphia, PA 19119-1602

February 19, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A I urge that no program or programs go ahead to either build nuclear weapons, or accessories thereof, or build structures in which to produce them. Such programs do not have my support, and never will. I see them as threatening to the world at large and to our own nation. They introduce greater instability. They create a climate in which other nations are more likely to proceed with similar programs.

Faith in the power of nuclear weapons to protect a society are blindly based.

2|9B There are projects of great potential value to our society and nation in promoting greater stability through improved relationships and improved conditions of living. This is where we need to direct our thinking and our hopes and our funding.

Sincerely,

Carolyn Mather
215 2478178

1

Mather, Jean
Page 1 of 1

PC_306

Theodore Wyka, Complex Transformation SPIES Document Manager
US Department of Energy
1000 Independence Ave. SW
Washington, DC 20585

Dear Sir:

1|3A I am writing to state my opposition to the proposed "Complex Transformation". I find the proposal to be contrary tp law, morals and common sense. We already have far more nuclear weapons than we could ever use and their life expectancy is greater than out own, so it makes no sense to me to create more or to build new facilities for holding the ones we already have. In addition, the United States is a signatory of

2|1F the Nuclear Non-Proliferation Treaty so it would be against the law to build more nuclear weapons.

3|9B Lastly, though by no means least importantly, I find it immoral to set the stage for the destruction of the planet and all within it and to spend money for this purpose that would be better used for the good of the human family and the preservation of this earth.

I hope you will take these points into consideration as decisions are made regarding this issue.

Sincerely,

Jean Mather

Jean Mather
5700 Bayonne Ave.
Haslett, MI 48840

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Levens, Matthew

From: Lou Matlack [lmatlack@igc.org]
Sent: Thursday, March 27, 2008 5:26 PM
To: Complex2030
Subject: NO New Nuclear Weapons

Lou Matlack
35 Mendham Road
Bernardsville, NJ 07924-1603

March 27, 2008

Complex Transformation Department of Energy

Complex Transformation Department of Energy:

1|16A As a scientist trained in nuclear science, I strongly oppose the administration's proposal to build a plant to produce nulear weapon's triggers, plutonium pits.

1|16A Cont. Similarly, I am also opposed to plans to modify nuclear facilities across the country, which would make it easier for the U.S. to rebuild its nuclear arsenal.

2|20 Since the Cold War, our nation has not produced significant new nuclear warheads. Our current military stalemates indicate that we need much more national emphasis on diplomatic and development capacities. We cannot win idealogical contests with nuclear weapons - particularly against poverty stricken non-state entities.

3|1J While the U.S. is asking others to forego developing nuclear arsenals, we are simultaneously trying to increase our own capacity to build new nuclear weapons.

4|1K Overseas, the Bush administration has destroyed our credability, among other ways, by encouraging frineds, like India to go ahead with nuclear programs; while damning non-friends like Iran, fo rall nuclear activities. We must be consistent at home as well. No

1|16A Cont NEW Nuclear Weapons.

1|16A Cont. 5|10B Congress rebuked the Energy Department's last attempts to upgrade the arsenal by defunding the Reliable Replacement Warhead and last year's proposed mega-scale bomb plant. The CMRR project is another irresponsible new program that must be rejected.

Sincerely,

Lou Matlack
908-766-0614

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PC_1126

Levens, Matthew

From: Kay Matthews [kmatthews@kitcarson.net]
Sent: Thursday, April 03, 2008 3:57 PM
To: Complex2030
Subject: public comment
Attachments: Complex Transformation comments.doc

5/15/2008

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April 2, 2008

Kay Matthews
Box 6 El Valle Route
Chamisal, NM 87521

At the public hearings regarding the SPEIS for Complex Transformation the overwhelming majority of speakers opposed the Preferred Alternative, which designates Los Alamos National Laboratory as a "Distributed Center of Excellence" where up to 80 plutonium pits per year will be manufactured. Their reasons were numerous. First and foremost, two decades after the Cold War has ended, deterrence is no longer a reason to build nuclear weapons. The United States has created a world of "nuclear apartheid," where the so-called "good guys" continue to maintain stockpiles of weapons of mass destruction while labeling any nation wishing to process uranium for nuclear power plants, which could lead to nuclear weapon capability, as "rogue states." 1| 13A.1 ; 2|1J

Additionally, the production of pits is unnecessary when existing pits can be "reused", which is far less expensive and environmentally damaging than new pit production. The pits actually last a century or more, which undermines NNSA's argument for both new-design weapons and expanded pit production. Ironically, it was a study by DOE's own Sandia National Lab that concluded "nuclear weapons [and their triggers] do not wear out," so clearly there is no rationale to manufacture new ones. According to Nuclear Watch New Mexico, despite the fact that Congress rejected all funding for new nuclear weapons designs, called Reliable Replacement Warheads, in 2007, NNSA "has not given up on" expanded pit production for new designs. 3| 5C.1; 4|8A

Moreover, it is premature for the Bush administration to be proposing this Complex Transformation based on his 2001 Nuclear Posture Review. The Defense Authorization Act of 2008 requires the incoming president to complete a new Nuclear Posture Review in 2009, which should be used as a basis for establishing future United States arms control objectives and negotiating positions. The Act also requires the formation of a bi-partisan commission appointed by the Armed Services Committee to recommend the number of nuclear weapons needed, the size of the nuclear weapons complex necessary to support that number, and assess the role that non-proliferation programs play in national security. 5|1C

According to Jay Coghlan of Nuclear Watch New Mexico, 70.4% of LANL's budget is spent on "core nuclear weapons research and production programs." New Mexico Congressman Tom Udall is calling for a diversified mission at the Lab that includes "renewable" energy programs, and the House recently allocated an additional $638 million to the energy budget for renewable energy research and production that LANL can compete for. 6|9B

The production of 80 new plutonim pits per year exponentionally increases the risk of safety and environmental violations for which LANL already has an abysmal record. The list of 7|7F

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contaminants already polluting the Lab and migrating downstream and downwind from our air, water, and communities is lengthy: radioactive elements include tritium, plutonium, americium, cesium, and strontium 90; and toxic chemicals include hexavalent chromium, nickel, high explosives, perchlorate, and pentachlorophenol. In March of 2005 LANL signed a "Consent Order" with the New Mexico Environment Department for a "fence to fence" clean-up of hundreds of polluted sites within the 27,000-acre complex. Although the clean-up is primarily in the assessment stage, NMED has already fined LANL almost a million dollars for not completing assessment documents and executing work plans. NMED has also filed a notice of intent to fine the DOE for not being in "substantial compliance" on an investigative report of one of the most intensely contaminated sites, Technical Area 21, where LANL built plutonium pits and stored solid and liquid waste. Incredibly, this highly polluted area is slated to be returned to Los Alamos County for economic development.

One of the most pervasive contaminants is hexavalent chromiun. In December of 2005 LANL reported high levels of this element in a well on Lab property. The findings exceeded Environmental Protection Agency contaminant levels by 400% and New Mexico drinking water standards by 800%. LANL neglected to report these findings to the NMED for almost two years. Equally important, the wells that LANL has drilled to monitor groundwater contamination at the Lab are plagued by a long list of flaws: being improperly sited; the use of drilling fluids that mask the presence of radionuclides; poor sampling methods; and misplaced screens in the wells. James Bearzi, NMED Chief of the Hazardous Waste Bureau, characterized DOE's groundwater monitoring efforts as "woeful." Bearzi went on to say that he feared DOE was not budgeting sufficient funds to meet the consent order schedule but claimed that NMED would accept no excuses and would continue to hold the Lab accountable. Jay Coghlan agreed, suggesting that DOE needed to increase the clean-up budget by 300%. 8| 14M.2

Meanwhile, this long list of contaminants is migrating down the Pajarito Plateau canyons into the Rio Grande, from which the cities of Santa Fe and Albuquerque are about to divert the majority of their drinking water. On May 18 of 2007 the NMED issued a press release identifying radiological contamination in sediment along the Rio Grande from past operations at LANL. According NMED Secretary Ron Curry, "Since the Cerro Grande Fire elevated levels of contaminants continue to flow from the Pajarito Plateau during floods. LANL must take actions to reduce and control the movement of contaminated sediments from Lab boundaries."

The Buckman Direct Diversion project (whose construction estimates are already way over budget) will divert water from the Rio Grande three miles downstream from the Otowi Bridge into a system of pipes to service the city and county of Santa Fe and Las Campanas. In June of 2007 the city reported a "qualified"—meaning a level that could not be measured—amount of plutonium 238 in the Buckman Wellfield. In October of 2007 the Buckman Direct Diversion Board voted to request that DOE and LANL fund and implement actions or programs to protect public drinking water: 1) Stop migration of LANL contaminants to the Rio Grande and groundwater by constructing sediment barriers and containment systems, improving waste

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treatment and disposal practices, and stabilizing and cleaning up sediment beds and banks in PC_1126
the Rio Grande tributary canyons; 2) Properly monitor the transport of legacy contaminants in both the surface and groundwater flow systems; 3) Measure the radioactive and toxic contamination of buried sediments containing high concentrations of post World War II legacy contaminants now buried in the slough upstream of the diversion site; 4) Provide an early warning system so the Buckman Diversion can temporarily cease operations when the Rio Grande is expected to contain elevated levels of contaminants from LANL; and 5) Provide funding for the Buckman Board to retain independent peer review by qualified persons regarding LANL contamination of Santa Fe County and City of Santa Fe water resources. If the residents of Santa Fe ~~think they're going to get th~~ese protections, all we can say is, good luck.

In February a coalition of community groups, including Concerned Citizens for Nuclear Safety, Amigos Bravos, Embudo Valley Environmental Monitoring Group, Partnership for Earth Spirituality, Rio Grande Restoration, the New Mexico Acequia Association, Tewa Women United, Don Gabino Andrade Community Acequia, SouthWest Organizing Project, and Kathy and
8| 14M.2 Gilbert Sanchez, filed suit against the DOE and LANL for violations of the Clean Water Act: failure to conduct adequate monitoring; failure to report violations; failure to have pollution control measures in place; failure to comply with water quality standards; and unauthorized discharges. The coalition's press release stated: "Many tributary streams to the Rio Grande, either wholely or partially on LANL property . . . are designated as polluted by the NMED. Most of the streams are polluted with PCBs, gross alpha, and selenium." Some of the canyons running through LANL have also tested positive for mercury, perchlorate, and hexavalent chromium. According to the coalition's press packet, the most pervasive contaminates are PCBs (Polychlorinated Biphenyls) and gross alpha. PCBs are a group of industrial chemicals used in electrical equipment. The manufacture of PCBs was banned in 1977 because they were proven to accumulate in the environment and cause adverse health effects including cancer, thyroid, stomach and liver damage, and impaired reproductive and immune systems. PCBs have been detected in LANL streams at levels that far exceed New Mexico water quality standards. Gross alpha is defined by a 2004 LANL report as "The total amount of measured alpha activity without identification of specific radionuclides." The same report defines alpha particle as "A positively charged particle . . . emitted during decay of certain radioactive atoms." Plutonium-239, the principle ingredient in nuclear warheads, is the "most hazardous alpha emitter . . . highly carcinogenic, chemically reac-
tive and flammable."

Other contaminants detected in water drawn from LANL streams and test wells are known to cause thyroid damage, birth defects, cancer, gastrointestinal problems, respiratory problems, kidney and liver damage, as well as circulatory and nerve problems. Many of these contaminants have already been detected in the municipal wells that supply Los Alamos and White Rock. Due to the lawsuit and the actions of Concerned Citizens for Nuclear Safety (CCNS), the Environmental Protection Agency has speeded up the release of its stormwater permit for LANL,

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an action not usually taken for individual facilities. PC_1126

While the NMED Consent Order and negotiations over the Clean Water Act lawsuit are addressing some of the environmental concerns at LANL, northern New Mexico's economic dependence on the Lab and the resulting economic disparities are still overriding issues. In his 2006 book, *Understories: The Political Life of Forests in Northern New Mexico*, Jake Kosek states: "The contrasts [caused by LANL] are startling. In a state that has the highest national rate of residents living in poverty, the second highest percentage of residents without health
9|14I insurance, the second highest rate of violent deaths among teens, and the third highest rate of violent crimes, Los Alamos sits on the hill with a population that is over 90 percent white, is the [wealthiest county] in the country, has a population that is almost fully insured, and has almost no violent crime. New Mexico is at the very bottom of the scale when it comes to teacher salaries and the socioeconomic conditions for raising children. Only 15 percent of neighboring Rio Arriba County residents over 25 have bachelor degrees or higher, and the dropout rate is almost 12 percent for those who start high school. In contrast, Los Alamos has the highest number of Ph.D.s per capita of any city in the world and the best-funded school system in the state; almost 90 percent of students who graduate from high school go on to a four-year college; and the dropout rate in Los Alamos is well under one percent, with the highest per capita number of national merit scholars in the country. Moreover, northern New Mexico is a site of long histories and traditions that are deeply involved with the ethnic past, whereas Los Alamos, like a 1950s chrome toaster, is a gleaming example of the modern world of technology, science, and the future. These are two different worlds, living together but entirely separate; one poor, one wealthy; one educated, one uneducated; one engaged in global politics of plutonium, genetic engineering, and biotechnology, the other in the politics of ancient acequias, land grants, and firewood. What could be more different from degraded grazing lands and trailer homes than particle separators in suburban neighborhoods?"

Now the rank and file Lab employees are also faced with the prospect of significant cuts in the
10|18A workforce. The Bechtel-University of California consortium that manages LANL wasted no time revealing what privatization will bring to the Lab: the layoff of approximately 400 contract workers and a subsequent reduction in the workforce through retirement and severance incentives is testimony to its "cost efficient" path towards profit. Of course Bechtel is guaranteed a contractual amount of profit no matter what it has to do to meet the DOE budget.

In the meantime, workers who have become ill as a result of exposure to radiation and toxic chemicals while working at LANL are struggling to be compensated by the government. Even by
11| 14K the miserable standard set by the government at other nuclear weapons facilities, LANL workers are qualifying under the Energy Employees Occupational Illness Compensation Program Act at one of the lowest rates. Less than 10% of the total number of applicants receive benefits. Under Part E of the Act, which compensates workers for impairment and lost wages, only 31 claimants have received impairment benefits and 34 claimants have been awarded wage loss benefits. At the same time, the administrative costs of this program continue to skyrocket and pad the

Matthews, Kay
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budgets of the Department of Labor and its contractors. PC_1126

LANL has polluted our bodies, air, water, forests, and soils and has created economic stangnancy in northern New Mexico. It's time to change its mission, as New Mexico public officials and its citizens are demanding. We also demand that the U.S. comply with the Nuclear-Non-Prliferation Treaty and that the SPEIS be rewritten to include a "No Weapons Production Alternative." 12|16A; 13|1F

Sincerely,
Kay Matthews

Matthiesen, Leroy
Page 1 of 1

PC_109

ST. PETER'S HOUSE
4209 NE 18TH
AMARILLO TX 79107

February 26, 2008

To: Members, Complex 20/30 Hearing Committee
Re: Proposal

I am Leroy T. Matthiesen, retired Bishop of the Roman Catholic Diocese of Amarillo. 1|16A

I ask you to put me on the record of the February 28 hearing in Amarillo as adamantly opposed to the proposal to modernize our nuclear weapons arsenal.

The possession of and the threat and intent to use nuclear weapons to destroy the society of any aggressor nation is immoral, so declared by the Roman Catholic Church, a declaration with which I personally fully agree and support. 2|20

Our nuclear weapons policy, first enunciated in 1968 and endorsed by our government to this day, spells out that by "society" we mean its men, women, and children, so that the aggressor nation will no longer exist as a viable society. That is immoral. 2|20 (cont)

The attempt to produce nuclear warheads so small and so accurate as not to destroy innocent people is fruitless, so horribly expensive as to be mind-boggling, and so exhaustive of our treasury that if you continue the effort, you will kill our brothers and sisters in Christ who increasingly cannot afford medical care. 3|9H

If you go forward with this immoral effort to upgrade your nuclear sabers and rattle them in the faces of the nations with whom we share planet earth you will be guilty of igniting another nuclear arms race and our world will again be living in fear. 4|1J

Please do not do this.

+Leroy T. Matthiesen
Retired Bishop of Amarillo